Beacon Fen Energy Park – Written Submission of Oral Case to ISH2 from North Kesteven District Council (ID F8D379496)

Agenda Item	Comments made by NKDC
Item 1 **Welcome**	n/a
Item 2 **Purpose of the ISH**	n/a
Item 3 **BESS**	**Submissions made by Constanze Bell of Counsel on behalf of NKDC** NKDC share the concerns of LCC regards whether the applicant has sufficiently demonstrated that the BESS meets the policy position for associated development set out in EN-1 and EN-3. Most NSIP level solar energy generation schemes consented within Lincolnshire have a similar generating capacity to their associated BESS and the available grid connection. NKDC has had regard to the Applicant's Oral Submissions made at Deadline 1 [REP1-030] and its Responses to ExQ1 made at Deadline 2 [REP2-040]. The Council is mainly concerned as to whether the proposed development would prioritise and maximise energy generation to the National Grid rather than to the BESS (ergo the degree to which the BESS is operationally subordinate) and what mechanism would be in place to achieve that. The applicant set out that, essentially, energy generated by the solar panels would 'bypass' the BESS in terms of preferential generation to the Bicker Fen Substation. The applicant explained, to a degree,

	the interplay between the solar generation, the BESS, and how the BESS would be used to balance energy generated not only by the adjoining solar panels in the scheme but also as 'freestanding' storage for energy directed out of the energy network/Bicker Fen substation. However, that explanation appeared, ultimately, to draw back to the point of simply justifying why and how a 600MW BESS would work operationally alongside a 400MW solar farm rather than, for example confirming why an alternative balance of energy generation to storage capacity (for example a 500MW installed capacity solar farm and a reduced capacity BESS) had not been favoured in order to maximise the energy generating capacity of the scheme. This is not least that the applicant had confirmed that solar generation would always be accommodated as a priority in the discharge to Bicker Fen substation over and above the BESS. The Council highlighted that, whilst detailed guidance on 'associated development' is set out in the Planning Act 2008 Guidance note ('Guidance on associated development applications for major infrastructure projects'), it still appears unclear as to why the 400MW/600MW proportion of solar to BESS constitutes genuine 'associated development' infrastructure; even though we accept that it would remain 'associated development' by virtue of its physical scale and footprint relative to the solar element. However, with reference to paragraph 5 (ii) of the Guidance Note the Council is not yet satisfied that an appropriate explanation has been provided to confirm operational subordinacy in terms of MW proportions. The Council notes that the applicant has not provided details of the energy storage of the BESS in MWh ie the quantity of electrical energy that the BESS can hold. This has been provided on other solar farm DCO applications in Lincolnshire (Mallard Pass, Cottam, Gate Burton, Tillbridge and West Burton). This would be helpful to understand to what extent the BESS is 'associated development'. The Council notes that the overplanting ratio of the solar farm (power capacity of the panels (400MW) / power capacity of the grid connection (600MW)) would be 0.67. This is an indication that

	the Applicant is not making full and efficient use of the available grid connection, a question that the ExA asked at ISH1. The Council notes that there is no policy requirement for projects to deliver an amount of energy generation which matches or exceeds its grid connection capacity, however, given the urgent need for renewable energy generation and the achievement of Net Zero; it would seem relevant that the large difference between the power capacity of the panels and the grid connection is examined and weighed in the planning balance. In their written oral submissions to ISH1 [REP1-030] the Applicant says that the 400MW power capacity of the solar panels is in direct current (DC). But on page 54 it is actually stated as 400MW alternating current (AC). It is not clear how the Applicant has arrived at the 400MW figure, but in any case it can only be AC or DC, not both – due to losses in the system resulting from passing through not just the inverters (to change the current from DC to AC); but also step- up transformers (to raise the voltage), along cables and through switches. So if the figure is 400MW DC from the panels, it will be less than that by the time it is sent to the grid in the form of AC current. It would be helpful if the Applicant could confirm exactly how they have arrived at the 400MW (AC) figure, including the calculation 'max power output from the site = no. panels x typical peak wattage of a panel'; and how they have allowed for losses to change this to AC power at the point of grid connection. At ISH2, the Applicant stated that no additional infrastructure would be need to charge the BESS from the grid. The Council requests confirmation whether the scheme already includes provision for the necessary infrastructure required to change the AC supply from the grid to DC in order to charge the BESS. The Council understands the LCC is seeking independent scrutiny of the information submitted to the examination to date regarding the BESS and reserves the right to comment further once this information has been submitted.

Item 4 **Landscape and Visual**	**Submissions made by Oliver Brown of AAH Consultants on behalf of NKDC and LCC** Under **Agenda Item 4 Landscape and Visual,** the agenda was broken down into seven key matters, and the ExA used these to focus questioning in the hearing towards the applicant. Following running through the first six key matters of Agenda Item 4, at key matter seven the ExA provided the opportunity for the Host Authorities to comment on any issues raised so far. Subsequently, we provided an overall summary of our comments on both the landscape and visual matters relating to the scheme and submission, as well as specific issues raised at this hearing. We were subsequently invited to identify any additional key matters that we wanted to address with the applicant at this hearing. We initially clarified that a detailed LVIA review has been carried out, which has been appended to the NKDC and LCC LIRs. This review provides clarity on our position and where we have additional questions and queries on the submission, as well as areas where we currently have disagreement with the judgements. We went on to clarify that a meeting has been arranged between the applicant and two host authorities of NKDC and LCC. This is to be held on 20 November 2025 and the agenda will cover key issues we have identified in our detailed review, where further clarifications are required, and will also likely cover matters discussed at the hearing. The outcome of this meeting will feed back into the evolving SoCG. In regard to a provision of an overall summary of our comments on both the landscape and visual matters relating to the scheme; our position is that 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 alteration to land-use and long-term change to the openness, tranquillity, and rural character of the area.

	As well as the scheme in isolation, we have a concern regarding both the change to the baseline landscape and also cumulative landscape effects: as identified at the statutory consultation stage, we have concerns regarding cumulative effects on the landscape at a wider district and regional scale. The mass and scale of several NSIP energy projects combined has the potential to lead to adverse effects on landscape character over an extensive area across multiple published character areas. The landscape character across the Nottinghamshire and Lincolnshire County areas will be altered by multiple schemes over their operational period through an extensive area of land use change, and introduction of energy infrastructure in an area that is predominantly agricultural. While it is not suggested that agriculture will not remain as a defining characteristic, over a short period of time large scale solar will undoubtably become a widespread characteristic in the region. Subsequently, we judge that solar development would be a key characteristic in any updates to published character assessments from local to national scale. However, given the absence of a unified, county-wide landscape character baseline across Lincolnshire, this presents a challenge when assessing cumulative effects of the scheme and how this additional development to those identified would change the assessed effect. 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 area. For example, across Lincolnshire and east Nottinghamshire: the Land Use is strongly rural and predominantly arable farmland; 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

	or woodland cover; and regarding Views & Openness, there is generally a strong sense of openness, big skies, and long expansive views. Therefore, across the region of Lincolnshire, based on these shared characteristics large scale solar development and new 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 become a distinctive key characteristic across the region as a whole. This scheme will contribute to this regional change. In regards to identification of key matters that we wanted to address with the applicant at this hearing; we provided six key points as follows: **Key Point 1:** We identified that the process of assessing baseline Landscape and Visual Susceptibility and subsequently Sensitivity are not apparent in the LVIA, and we requested the applicant provide clarity as to where these sections were located and how these judgements have been made; We also noted that no Value or Susceptibility assessment for individual visual receptors could be located: only a final judgement of Sensitivity within Appendix 6.4. The applicant identified the locations where this information is available and we will discuss this further with the applicant at a focussed landscape and visual meeting to ensure the information identified is appropriate; **Key Point 2:** ES Table 19.2 concludes residual significant landscape effects are limited to those at a Site-level, but we consider the broader character area (Fenland character area) would still subject to long-term significant adverse change (refer to AAH LVIA Review para. 4.13): 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. Open agricultural fields are a key component of this landscape, and subsequently this landscape receptor would maintain a residual moderate adverse effect which would be significant;

	Key Point 3: We identified a concern regarding mitigation planting causing adverse effects, particularly to open views. However there are several instances of this being assessed within the LVIA as reducing the Significance of visual effects through screening. Mitigation planting can be an effective way to screen development proposals and add valuable landscape and ecological elements; but this mitigation planting needs to be carried out in a way that is sensitive to the existing landscape character and views. As demonstrated on photomontages associated with the RVAA, existing open views across a rural landscape will be affected initially by the development, then at the residual stage once planting has matured. These open rural views will be drastically foreshortened by both the development and the maturing planting. The outlook for residential receptors will be completely altered from the existing, or baseline view. The view and photomontages from Howell Fen Farmhouse that was displayed and discussed at the hearing is an example of this. We also queried as to whether there was additional scope to increase embedded mitigation by moving development further from visual receptors, particularly residents of nearby properties, but also PROW users would benefit from larger offsets. **Key Point 4**: We have identified concerns regarding the proximity to several properties to above ground development, but also, as identified above, the screening effects of established mitigation. In particular: R1 Group Receptor: Eweby Thorpe Farm; and Ewerby lodge; R2 Group Receptor; Howell Fen Farmhouse; Asgarby Barns; and Westmorelands Farm; R4 Gashes Barn (RVAT reached); R20 Group Receptor; Crown Cottage; and Keepers Cottage. These properties appear very close to the development and offsets appear to be minimal. Of particular concern is R4 Gashes Barn, where significant visual effects are identified, as well as this property reaching the Residential Visual Amenity Threshold (RVAT). The RVAT is a very high bar to reach for private views, and demonstrates the extent of change in view from this property and limited consideration in regards to the layout and embedded mitigation. We queried as to whether

	the applicant could review the offsets from this property to lessen the significance of effect for residents; **Key Point 5:** The development of solar farm projects and energy infrastructure in the region is not acknowledged to be a factor in the future baseline within the LVIA. This is a landscape undergoing an extensive change to land-use, from agriculture to renewable energy and energy infrastructure. There are several projects already approved, and several in the planning system. These include Solar, BESS, Grid upgrades, Sub-stations and flexible generation facilities at both an NSIP DCO and TCPA scale. **Key Point 6:** No Significant landscape or visual cumulative effects are identified in the LVIA. However, we have concerns regarding cumulative effects due to the unprecedented number and extent of renewable energy projects and associated infrastructure in the region. The mass and scale of several NSIP scale energy projects, along with planned National Grid projects, combined with Beacon Fen will likely lead to adverse effects on landscape character over an extensive area across multiple published character areas (refer to point above for additional information). We acknowledge that the initial list of cumulative projects identified at the statutory consultation stage have been considered within the LVIA, however the baseline is constantly changing with additional schemes coming online regularly (illustrating the pressure this landscape is under from renewable and energy development) and an updated list of nearby projects is being provided to the applicant to consider.
Item 5 **Historic Environment**	**Submissions made by Matthew Bentley, Conservation Officer at NKDC** **St Andrews Church** – the Council is of the view that the applicant has not considered the impacts on the Grade I Listed Building thoroughly enough and that adverse impacts on the heritage asset have been downplayed in the ES.

	For example, impacts on the church are only assessed from the west. From the east, however, the church is fully visible as it is on a rise. In addition, from the west, the church would be fully visible in conjunction with the Bespoke Access Road (BAR). During the operational phase, the ES states that the impact on the church will reduce to moderate adverse. Very little detailed information about BAR is currently available with the DCO submission eg lighting, fencing, traffic levels which will have impact on the setting and significance of the church. The Council considers that such a reduction in impact cannot reasonably be concluded as the BAR is not designed to a level of detail that would enable such a conclusion to be reached. The Bespoke Access Road Construction Method Statement Document Reference: 6.3 ES Volume 1, 6.3.5 Appendix 2.2 confirms that the BAR will have an operational life of 45 years. The ES has not considered PROW views which are further wide-ranging views. The likely impact has not been thoroughly assessed enough, and the Council considers that they will be significant being at the higher end of 'less than substantial harm'. In view of the above, the Council considers that bespoke mitigation from east needs to be included as part of the submission as it is currently omitted from the proposals. However, any such bespoke mitigation (for example soft landscaping) might itself then have associated impacts on local landscape character meaning that particular care is required. **South Kyme Tower** – the Council recognises that the applicant has undertaken robust research into the significance and setting of this heritage asset, however, it disagrees with low level of impact that is ascribed in the ES. The tower makes significant contribution to the landscape. There are visual connections between the tower and the solar array, west of Midfodder Dyke. The Council considers this to be of a medium level. In addition, the Council has referenced the Secretary of State's decision on the Heckington Fen DCO in its LIR, noting that the Beacon Fen proposals are closer. This ought to trigger a requirement for bespoke mitigation for impacts on the tower.

	Group of assets at Asgarby – the Council considers that the heritage assets at Asgarby ought to be assessed as a group as well as individual heritage assets.
Item 6 **Biodiversity and Ecology**	**Submissions made by David Broughton of AECOM on behalf of NKDC** **<u>Scarce Arable Flora</u>** Scarce arable flora are plant species that grow on land subject to annual cultivation for the growing of crops. They are dependent on such land for the maintenance of their populations. Scarce arable flora as a group are some of our most threatened plant species due to changes in land management. Many such species have been recently assigned an elevated threat level in the current Great Britain Red List[1], indicating ongoing population declines. Along with ground nesting birds, they are the species that are most likely to be adversely affected by land use change for solar projects. Consequently, all recent DCO solar projects within North Kesteven have been asked to present data on scarce arable flora and all preceding solar projects have done so, with some finding notable populations requiring mitigation. The Applicant has stated that scarce arable flora are addressed for the Solar Array within APP-100. The Council can find no evidence to substantiate this within the methods and references cited, or the survey results presented. The need for data was first raised at Scoping (APP-071). To expand further on the points made previously in relation to the survey work completed: 1) The timings of the survey do not appear suitable. The survey was completed at the end of July 2023, at a time of year when many fields will have been harvested (as shown in the available photographs within the Application documents). Good practice survey timings are late May

[1] https://britishandirishbotany.org/index.php/bib/article/view/195

	to early June based on the standard Plantlife survey method[2]. This method clearly states surveys "need to be completed prior to the crop being harvested." 2) The Applicant states on page 435 of their response to the Council's LIR [REP2-041] that (a) as the survey focussed on field margins the survey did not need to be timed to avoid harvest, and (b) the survey followed the National Vegetation Classification methodology. This is not a reasonable statement. Scarce arable flora occupy cultivated ground so they occupy habitats affected by mechanical disturbance during harvest, hence the good practice survey timings. Further, National Vegetation Classification methods are not an appropriate method for surveying for scarce arable flora. 3) The response to the LIR [REP2-041] suggests that arable field margins were surveyed. The Council does not disagree with this as a broad statement but it distracts from the evidence presented in APP-100. The cause for disagreement is that there is no evidence that it was the margins of the cultivated land that was surveyed for arable flora. Instead, the implication is that it was the grassland habitats next to cultivated land that was surveyed. Grassland habitats do not support scarce arable flora. 4) The Council can only find evidence for the survey of grassland habitats within APP-100. This is indicated by the descriptions of the habitats surveyed, the photographs within Table 2 showing these habitats, and the species lists given in Appendix 1. The predominant species within these lists are those of permanent grassland. This has implications for the mitigation proposed. The Applicant states in their response to the Lincolnshire County Council LIR (REP2-041) that existing field margins will be maintained (page 44). This may be the case for grassland, but the margins of the cultivated land will not be retained in

[2] https://naturebftb.co.uk/wp-content/uploads/2019/11/IAPA-Survey-Instructions_BLUE.pdf

	annual cultivation. There is no mitigation proposal suitable to address scarce arable flora, and no obvious botanical data to inform a mitigation specification for scarce arable flora. **Hedgerows** Insufficient evidence has been presented to verify the baseline status of the hedgerows on site or to permit agreement that the proposed BNG enhancement is realistic. This Central Lincolnshire BNG Guidance[3] requires provision of raw data from surveys (page 44). The comparable guidance for Lincolnshire[4] (page 22) also advises that additional detail and explanation is required to justify habitat conditions. This aligns with the requirements within the Condition Assessment instructions issued with the Statutory BNG Metric i.e. "relevant evidence for passing or failing criteria, or for a particular score, should be captured within the habitat survey notes or by taking photographs." (Step 3 part E). It also identifies the method to be used for the assessment of hedgerows (both in terms of assigning a type and determining the condition) which in turn defines the data that should be provided with survey reports. A method statement has not been provided to explain the approach to hedgerow survey and consequently the Council is not in a position to agree (as there is no detail to verify) the hedgerows have been correctly classified in accordance with the UKHab classification and its underpinning methods. The Applicant's current BNG Strategy [REP2-029 & -031] states that the development will achieve enhancement by transforming six species-poor hedgerows into species-rich hedgerows. The relevant hedgerows (based on the current Metric, REP2-031) are Hedgerows 1 to 6.

[3] https://www.n-kesteven.gov.uk/sites/default/files/2024-05/Central%20Lincolnshire%20BNG%20Guidance.pdf
[4] https://www.lincolnshire.gov.uk/downloads/file/10513/biodiversity-net-gain-planning-guide

	Only brief summary data is presented for these six hedgerows in APP-100 and this does not clarify how many species would need to be added to make these hedgerows species-rich. I consider that this enhancement strategy would only be practical if these hedgerows are very gappy throughout their length, such that there is sufficient space to implant additional tree and shrub species and change the overall composition of the hedgerows. However, four of the six hedgerows are stated within Appendix 2 of APP-100 to be largely intact i.e. less than 10% of their total length has gaps and there are no gaps of greater than 5m width. This does not suggest sufficient gaps to plant into and change the overall composition of these hedgerows. **<u>Ditches</u>** The Applicant states [REP2-029 & -031] that they will achieve enhancement by transforming ditches from poor condition to moderate condition. There is no evidence (see above points under hedgerows) for the baseline assessment of poor condition or as a basis for agreement that moderate condition can be achieved. The Applicant states moderate condition will be achieved by addressing three BNG condition assessment criteria. These are criteria A, B and C. The Council is not satisfied that this is realistic, for the reasons given below: 1) **Criterion A** relates to water quality. No baseline evidence has been provided for existing water quality issues. The Applicant's response to the LIR from North Kesteven District Council [REP2-041, bottom of page 236, ID 14.13] presents only speculation on this point stating "No further botanical assessment was identified as necessary for the water courses as these are likely to be influenced by agricultural chemical inputs (including fertilisers and

	herbicides) which would reduce or eliminate biodiversity." What is the evidence for the elimination of biodiversity? 2) **Criterion B** relates to botanical diversity and requires more than 10 species of aquatic plant in a 20m section of ditch. No structured data is presented on the existing botanical diversity to evidence the baseline impoverishment of the ditches, or to inform a specification to address this. Indeed, the response quoted above against Criterion A indicates that no botanical surveys were made due to the assumptions on water quality. The practicalities of increasing and maintaining botanical diversity are yet to be demonstrated and cannot be agreed without presentation of data on the existing botanical diversity. 3) **Criterion C** relates to cover of algae and duckweed, which are negative indicators that proliferate under conditions of nutrient enrichment. No baseline data is presented to demonstrate existing issues. No evidence is presented to provide certainty that this can be suitably addressed. Any proposals relying on enhancement of Internal Drainage Board managed ditches would need the agreement of the Internal Drainage Board. Confidence would be needed that the Internal Drainage Board maintenance regimes and maintenance priorities would not conflict with the BNG Strategy. **<u>Water Vole</u>** The Applicant has potentially misunderstood the prior comments in relation to water vole. Irrespective of the current status of water vole ditch by ditch, the Council's concern is that the details set out in REP2-015 allow for significant impacts to water vole habitats in relation to the Cable Route (and potentially also the Bespoke Access if water voles are present on relevant ditches). The Applicant found water voles in 28 ditches on the Cable Route (APP-110), at least 12 of which seem likely to be impacted based on their orientation relative to the Cable Route. Paragraph

	7.7.12 of REP2-015, which relates to mitigation, states that there could be 30m of habitat disturbance/removal on each bank of each ditch crossed by the Cable Route, and up to 50m (motorway width!) for the Bespoke Access. The worst-case impacts therefore seems excessive in relation to the habitats of a legally protected and nationally threatened species and is not consistent with Standing Advice[5]. Construction methods are available that can be adopted to avoid impacting water vole. This worst-case impact might be reduced later, but as the DCO would permit this level of disturbance I am reluctant to rely on this. Particularly given the lack of clarity on final routing. It is not certain that worst-case mitigation needs could be met. If the Applicant were to progress the above worst-case construction methods, then potentially a Development Licence would be required and would necessitate both mitigation and enhancement. It is not clear the Applicant has a strategy in place to meet these potential requirements. At present the impact assessment in paragraphs 7.6.59-7.6.61 does not reference the worst-case construction methods stated in paragraph 7.7.12. No attempt is made to quantify the worst-case impacts on water and the implications of these impacts. Water voles are highly territorial and therefore the displacement arising from such extensive worst-case habitat loss is likely to be adverse for the local population. The impact assessment should be updated to provide a clear assessment of the worst-case, identify the mitigation needed to address this, and demonstrate that this mitigation is both feasible and securable. The relevant Standing Advice[6] should be considered when making this assessment. This states "Where possible development proposals should avoid negative effects on water voles. Where this is

[5] https://www.gov.uk/guidance/water-voles-advice-for-making-planning-decisions
[6] https://www.gov.uk/guidance/water-voles-advice-for-making-planning-decisions

	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. Developers could redesign the development proposal to avoid: • working where there are water voles • habitat fragmentation and isolation by maintaining habitat connection • damage to water vole habitat." The Council has previously submitted detailed comments to the Examination at Deadline 3 [REP3-010], including a letter from AECOM with a green and orange highlight for topics that we understood to be in hand and resolvable. The intended inference was that all other matters that were not highlighted were still to be addressed by the Applicant. It would be helpful if future discussions could be focused around this document. **Ecological Steering Group** – NKDC continues to request (and therefore also supports LCC's position) that there should be the establishment of an Ecological Steering Group (ESG) consistent with the Outer Dowsing Offshore Wind application and the Springwell Solar Farm applications. In the case of Outer Dowsing, the ESG and a financial contribution related to monitoring and will be secured via a s106 agreement with LCC. In the case of Springwell, the ESG and an associated financial contribution related to monitoring will be secured via a s106 agreement with both LCC and North Kesteven District Council. The Springwell s106 Agreement is at an advanced stage of preparation and totals £130,500. As agreed with LCC, the general purpose and function of the ESG should follow a similar wording to that included in the Springwell solar farm oLEMP and draft s106 agreement. The oLEMP [REP5-013] can be found here at Section 7.2: EN010149-000987-Springwell Energy Farm Limited - oLEMP.pdf

	The Springwell oLEMP confirms that BNG monitoring will be a component of the ESG, rather than an additional, duplicated, cost and for the avoidance of doubt this would also be the case at the Beacon Fen solar farm. Furthermore, there is nothing in the draft s106 Agreement itself for the Springwell solar farm which 'disapplies' that the ESG fund can be used for BNG monitoring nor does it impose any % or absolute financial 'cap' on the amount of the ESG payment that can be directed to reviewing the applicant's BNG monitoring reports. Indeed, the draft s106 Agreement appends the oLEMP extract which sets out the qualifying heads of terms for the ESG and which includes reviewing the applicant's BNG monitoring reports. The BNG monitoring fee component for Springwell solar farm has been costed at £104,500; i.e. around 80% of the total ESG figure. Given that the emerging Springwell s106 Agreement provides for the contribution to be spent enabling the local authorities' involvement in the ESG, the Council's position is that it is probable that the vast majority if not all of the ESG expenditure would be on the BNG overview and scrutiny task, with the residual circa 20% of the fund dedicated to other ESG tasks. NKDC has estimated the BNG monitoring element for Beacon Fen, which, based on the applicant's current submission across the three habitat types is £94,081. NKDC has shared this with the applicant. A breakdown of the calculation is appended to this statement. On the basis of an equivalent 80/20 proportion (based on the Springwell cost breakdown) of the BNG monitoring estimate relative to the overall ESG component, NKDC estimates an overall ESG contribution of £118,000 is required and should be secured by the s106 Agreement. NKDC will continue to liaise with the applicant on this matter. Both NKDC and LCC are in agreement over the approach to the ESG remit and the financial contribution.
Item 7	n/a

Review of issues and actions arising	
Item 8 **Any other business**	n/a
Item 9 **Closure of the hearing**	n/a

Item 2 - NKDC Calculations for BNG Monitoring

NKDC would apply an hourly rate of £57.35 (a 2% inflation rate is applied to this across the 30 years).

There is then a proportionate cost for software, equipment, memberships, staff training, expected petrol etc over the lifetime of the project (5% inflation are applied to these items).

Then a 10% risk applied should we need to conduct additional monitoring or spend a greater number of hours due to discrepancies

Over the years 2, 5, 10, 15, 20, 25, 30, the cost will be for the LPA to compare applicant monitoring submissions to AI mapping (costed separately) to determine a 20% sampling strategy of the site and conduct those quality assurance checks (over the 30 years we will aim to develop a strategy those ensures that all parts of the site will have been quality assurance checked at least once).

Area Habitat - based on the current metric there is 529.23ha of monitorable habitat (37.56ha or retained habitat in moderate or above condition, 30.7ha of created habitat in moderate or above condition and 461.07ha of created modified grassland in moderate condition.

Based on a 20% sample, this would equate to 105.846ha to be sampled on years 2, 5, 10, 15, 20, 25, 30. This would equate to 66 hours of work per monitoring year. This brings the total are habitat monitoring cost to £61529.14.

Hedgerows - based on the current metric there is 16.61km of monitorable habitat (12.45km retained habitat in moderate or above condition, 2.78km of created habitat in moderate or above condition and 1.38km enhanced). Assuming once again 20% (which is 3.32km) with an additional 7.5 hours per monitoring year which brings Hedgerow monitoring to £6,518.80.

Watercourses - based on the current metric there is 97.26km of monitorable habitat (13.67km retained habitat in moderate or above condition, 83.59km of enhanced habitat). Assuming once again 20% (which is 19.45km) with an additional 9.75 hours per monitoring year which brings watercourses monitoring to £7,763.55

AI background mapping - to support assessment of delivery of total BNG within the Development boundary would cost £18,269.80 (including inflation) without subscription to the service itself. The cost is calculated at £1.40 per ha (eg using Landapp). The whole development boundary needs to be assessed to ensure total percentages are met in line with the DCO which monitoring of only the significant gains would not achieve. This mapping as mentioned above then informs significant habitat selection.

The overall cost of BNG monitoring is £94,081.29. Should the BNG figures change over the course of the examination, the figures can be recalculated. For the avoidance of doubt, this would form part of the total ESG funding of £118,000 which would cover <u>both</u> BNG monitoring and other ESG tasks.