



# BEACON FEN ENERGY PARK

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Applicant's Responses to ExQ2

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## Quality information

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## Glossary

Abbreviation	Description
AC	Alternating Current
AIS	Air Insulated Switchgear
Applicant	Beacon Fen Energy Park Ltd
BESS	Battery energy storage system
CCTV	Closed circuit television
DC	Direct Current
DCO	Development Consent Order
EA	Environment Agency
GIS	Gas Insulated Switchgear
HV	High Voltage
IDB	Internal Drainage Board
LCC	Lincolnshire County Council
Low Carbon	Low Carbon Ltd
MW	Megawatts
NGR	National Grid Reference
NKDC	North Kesteven District Council
NSIP	Nationally Significant Infrastructure Project
Order	The Beacon Fen Energy Park Order
PCU	Power Conversion Unit
PINS	Planning Inspectorate
Proposed Development	The entire development to be constructed and operated within the Site, as set out in Schedule 1 of the draft DCO
PRoW	Public Right of Way
PV	Photovoltaic
Site	The entire 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
SoS	Secretary of State

## Disclaimer

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# 1. Introduction

- 1.1.1 This **Applicant's Response to Examining Authority's Second Questions (Document Ref. 9.20)** 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 responses made by the Applicant to the **Examining Authority's Written Questions 2 ('ExQ1') (PD-013)** which were published on 1 October 2025 in relation to the application for development consent (Application) for the Beacon Fen Energy Park (the {Proposed Development}).

## 2. Applicant Responses to ExQ2

Table 2.1 – ExQ2 Responses

EXQ2	QUESTION TO:	QUESTION	DRAFT RESPONSE
General and cross-topic matters			
GCT.2.1	Applicant	Could the applicant please provide more detail in relation to its approach to the design and layout of the solar array panel area and how buffers and potentially other design measures have been considered as part of a mitigation strategy for both Gashes Barn itself and the access road leading to Gashes Barn and why the applicant has chosen the proposed approach? Although the Design and Access Approach document [APP-278] mentions a meeting to discuss the buffers to Gashes Barn and then a follow up meeting, the ExA would welcome further detail (including extent of buffer considered, how wide it should be and any assessment that justifies why the buffers proposed, particularly for the access road, was chosen).	<p>The Applicant held a design workshop specifically in relation to the Solar Array Area layout around Gashes Barn. It was determined that the key environmental considerations comprised noise, landscape &amp; visual and heritage.</p> <p>For noise, it was determined that the key constraint was the location of the BESS compound. This was located centrally within the Solar Array Area, maximising the distance from residential receptors, including Gashes Barn. The layout of equipment outside of the BESS was also designed to minimise potential noise impacts on Gashes Barn (and other residential receptors). Noise modelling subsequently confirmed that potential noise impacts would be sufficiently mitigated. The consideration of buffers then focused on landscape &amp; visual and heritage effects.</p> <p>For heritage, the key consideration was setting and, with the exception of the access road (included for the installation of cables), the property and surrounding grounds of the property are excluded from the Order Limits, much of the setting is retained. There would still be an impact to the setting as a result of the change of use of the surrounding agricultural land, however the solar PV exclusion zones (or buffers) would not retain agricultural land and therefore any increase in these buffers would not mitigate this impact.</p> <p>Whilst the access road itself isn't an important asset, it is considered that the intended view from the principal elevation of the property is along the driveway contained within the grounds of the property. The driveway is orientated slightly further west than the existing access road, which has been aligned with the field boundaries. On this basis, it was agreed to have a wider buffer to the access track immediately north of the grounds of the property, to maintain an element of openness along the alignment of the driveway. This was to also ensure that key views to and from Gashes Barn along the access road are maintained towards Black Drove.</p> <p>The Applicants response to Action Point 3 in <b>The Written Summary of Oral Submissions from Issue Specific Hearing 2 and Responses to Action Points (REP4-026)</b> provides further information in relation to the definition of buffers and offsets. With regard to offsets from the property, it is noted that the property is located within a substantial landholding with minimum offsets from energy infrastructure of 140m and up to approximately 200m to the south. These distances are similar to or greater than the offsets provided for other residential properties which are located adjacent to the Solar Array Area. The definition of these offsets has been further influenced by the objective of relating associated mitigation planting to the existing landscape pattern. Planting has been located to strengthen</p>



			<p>field boundaries and associated features rather than artificially subdividing existing land parcels and field units. This matter is also discussed in the Applicants response to ExA question LSV 2.1. Regarding offsets from the access road the Applicant notes that, <i>“A 15m offset defined by a native hedgerow from Black Drove, which provides access to the property will also be introduced to provide continuous visual separation between the property and the point where the access road joins the public highway. Overall, the intention is to introduce mitigation planting to the perimeter and boundaries of existing land parcels rather than more centrally in existing field units to avoid fragmentation and contribute.”</i></p> <p>Tree planting was proposed to the east, south and west of the property in order to screen views and reduce the impact on residential amenity. To the north a reduced level of planting is proposed, with hedgerow rather than trees, to maintain openness whilst providing some screening of the solar arrays.</p> <p>The information above sets out the careful consideration the Applicant has given to the design of its mitigation and layout of the Proposed Development in respect of Gashes Barn and the corresponding access road. The Applicant considers its approach to be proportionate to the nature of the Proposed Development and which strikes an appropriate balance between mitigating its impacts whilst also maximising the generation capacity of the solar array, which is recognised as critical national priority infrastructure under EN-1 (as outlined in section of the <b>Planning Statement (APP-277)</b>).</p>
Compulsory Acquisition, Temporary Possession, Land Rights and related matters			
CA.2.1	Applicant	<p>Considering that Gashes Barn (R4) would be surrounded by solar panels from all directions as a consequence of the proposed development, has the applicant considered the possibility of needing to compulsory acquire the property? If yes, why has the applicant not pursued this option and if no, why was this option not considered a.s part of the overall proposal?</p>	<p>The Applicant's full case justifying the need for the compulsory acquisition powers contained in the Draft DCO (Document Ref: 3.1) is set out in the Statement of Reasons (AS-013). Section 122 of the Planning Act 2008 sets out the requirements that need to be satisfied for the Secretary of State for compulsory acquisition to be authorised:</p> <ol style="list-style-type: none"> <li>1) <i>The land is required for the development to which the development consent relates;</i></li> <li>2) <i>The land required for the development is required to facilitate or is incidental to the proposed development.</i></li> </ol> <p>Apart from where land is required across the access road to Gashes Barn (to install cables), the land (and residential dwelling) is not required either for the development itself, or to facilitate, or is incidental to the Proposed Development. In the counterfactual situation where the Applicant had included Gashes Barn (including the property itself and the ground surrounding the property) within the scope of the powers of compulsory acquisition sought in the <b>Draft DCO (Document Ref: 3.1)</b>, it would not be in a position to demonstrate to the Secretary of State that the Section 122 "test" was satisfied in the Order.</p> <p>Guidance<sup>1</sup> also directs that Applicants seeking compulsory acquisition powers should be proportional in the approach to acquisition, stating <i>‘The Secretary of State will need to be satisfied that the land to be acquired is no more than is reasonably required for the purposes of the development.’</i> As the land (and</p>

<sup>1</sup> [Planning Act 2008: Guidance related to procedures for the compulsory acquisition of land](#)

			<p>dwelling) is not required, and any request for compulsory acquisition of the dwelling would be disproportionate, the case for compulsory acquisition cannot be made.</p> <p>Further, given the suite of mitigation measures (set out in response to G.C.T 2.1), there is no justification based on environmental impacts to for the Applicant to seek acquisition of a private dwelling by compulsion.</p> <p>The effects on this receptor remain as set out in the ES and the <b>Planning Statement (APP-277)</b>, and the Applicant's position is that it has applied the mitigation hierarchy and sensitively designed the scheme (including mitigation) in order to minimise those effects. As recognised by 5.10 of NPS EN-1, some landscape and visual effects are inevitable with large scale energy projects, and the Applicant considers that the residual effects are outweighed by the benefits of the scheme (see the Planning Statement, policy compliance tables addressing compliance with EN-1 paragraphs 5.10.14 &amp; 5.10.37).</p> <p>Notwithstanding this, as with all Affected Persons, the Applicant has taken a proactive approach to engaging with the owners of Gashes Barn and is now agreeing an agreement with that party, as is set out in the updated version of the <b>Land and Rights Negotiations Tracker (Document Ref: 4.4)</b> submitted at Deadline 5. Whilst the terms of the agreement are confidential, the Applicant considers the effect of the agreement to be that the residual concerns in relation to the impact on this receptor from the Proposed Development would be resolved.</p> <p>The absence of any representation/objection from the owners of Gashes Barn reflects the efforts taken by the Applicant to engage with the owners and work with them to address any concerns they may have in respect of the Proposed Development.</p> <p>Due to the terms of the agreement being confidential, the Applicant's position is that Gashes Barn should continue to be treated as a residential receptor for EIA and policy purposes and the Applicant's position remains as set out above that the residual effect (which is not significant and whilst it could be perceived as "overwhelming" is it not "overbearing" in the medium term) is outweighed by the scheme's benefits.</p>
CA.2.2	Applicant	<p>In relation to plot 1-4, the applicant is seeking the permanent acquisition of new rights over a private road (Black Drove), verge and unnamed drains leading to Gashes Barn. As the only access to Gashes Barn itself is via the land in plot 1-4 how has the applicant secured that the occupiers and residents of Gashes Barn will have appropriate means of access in and out of their property at any time and how is this secured via the dDCO?</p>	<p>The Applicant confirms that the proposed use of the access road is covered by the voluntary agreement referred to in the response above.</p> <p>Notwithstanding the existence of this agreement (of which the terms are confidential), the Applicant considers the inclusion of these rights to be appropriate and proportionate to enable the deliverability of the Proposed Development in the event that the voluntary agreement falls away for any reason, in order to facilitate the Applicant laying electrical cables within the Solar Array Area, as more particularly described in the <b>Draft DCO (Document Ref: 3.1)</b>.</p> <p>As a general point, the Applicant considers that any rights (if sought) would be unlikely to materially interfere with or be prejudicial to the existing private right of access given the nature of the proposed use of the land as part of the Proposed Development.</p>

CA.2.3	Applicant	Can the applicant please clarify why plot 1-4, which the applicant is seeking the permanent acquisition of new rights to, is needed? And can the applicant please provide justification for why it is needed, particularly in light of the need to reduce CA? This is in addition to the request made to the applicant at CAH1 to provide detailed assessment on a plot by plot basis for why CA powers are required, which is expected at Deadline 5.	<p>Please refer to the response to CA 2.2 above, which is also relevant to this response. The Applicant has justified why it considers the powers sought over this plot, and all of the powers sought in the <b>Draft DCO (Document Ref: 3.1)</b>. In addition, in response to Action Point 3 from Compulsory Acquisition Hearing 1, the Applicant has prepared a table setting out the detail of why compulsory acquisition powers are sought over each plot, and the nature of those powers as a supplement to the suite of land related documents already in the Examination library.</p> <p>Wherever possible, and as required by the Guidance<sup>2</sup>, the Applicant will seek to minimise the exercise of compulsory acquisition powers and will only seek permanent rights over the minimum amount of land required in order to facilitate the Proposed Development, and will also consider whether the use of "lesser" temporary possession powers can be used in combination with seeking permanent rights.</p>
Development Consent Order (DCO) and other consents			
DCO.2.1	Applicant, IPs, APs, SUs and HLAs	Following from the DCO hearing on this matter at ISH3, the ExA will provide further comments (if any) on the dDCO on Monday 26 January alongside ExQ3 (if any).	The Applicant notes this comment and refers to the latest versions of the <b>Draft DCO (Document Ref: 3.1)</b> , <b>Explanatory Memorandum (Document Ref: 3.2)</b> and <b>Schedule of Changes to the Draft DCO (Document Ref: 3.1)</b> which have been submitted at Deadline 5 and contain a number of updates relating to ongoing discussions and agreement with Interested Parties.
Biodiversity and Ecology			
BIO.2.1	Applicant, IPs, APs, SUs and HLAs	Following from ISH2 and the ExA's questioning, the applicant has confirmed, in its response to ISH2 Actions 11 and 12 in Table 3.1 of [REP4-026], that it will review ES Chapter 7 [REP2-013] and submit a revised version of this at Deadline 5. The ExA will therefore pose any questions that may remain at ExQ3, Monday 26 January.	<p>The Applicant has reviewed <b>ES Chapter 7 Ecology (Document Ref: 6.2.7)</b> and has submitted an updated version in response to ISH2 Actions 11 and 12 and comments from Interested Parties. To summarise, the changes made are as follows:</p> <ul style="list-style-type: none"> <li>• The effects on ecological receptors have been reviewed and amended, where inconsistencies were identified including in Tables 7.9 to 7.11.</li> <li>• The effects have been reviewed to make sure impacts are treated consistently in the approach between the construction operation and decommissioning phases.</li> <li>• Clarifications have been made on the lengths of ditches directly impacted, to correspond with that provided in Table 2.1 of <b>ES Chapter 2 Proposed Development (APP-053)</b>.</li> <li>• Additional detail on the mitigation for impact on fish has been included in response to comments from the Environment Agency (Comment EA04 in <b>RR-006</b> and <b>REP2-046</b>).</li> </ul>
BIO.2.2	Applicant, Natural England, Environment Agency, NKDC	Please see questions included in the RIES published on the 8 December 2025.	The Applicant has provided individual responses to the RIES at <b>Appendix 1</b> of this document.

<sup>2</sup> [Ibid.](#)



Historic Environment

HEN.2.1	Applicant	<p>The applicant has confirmed in [APP-059] that the Church of St. Andrew at Asgarby would be impacted by the Bespoke Access Road, particularly during construction stage, due to new movement in the landscape, an increase in traffic noise, increase in vehicular lighting and increase in air pollutants and the presence of new highways infrastructure. Although it is accepted that at operation stage, all the factors that the applicant has considered which are linked to the use of the Bespoke Access Road will be greatly reduced, can the applicant please explain how the presence of a new highway infrastructure was considered and why its effect is not deemed to be significant?</p>	<p>The Bespoke Access Road will during the construction phase result in a temporary moderate adverse short-term effect that is considered significant. The Applicant has developed further detail of the soil stockpiles (as outlined within Chapter 2 Proposed Development (APP-053) resulting from construction of the Bespoke Access Road ('BAR') to illustrate how these can be utilised as bunds, or sloping mounds, to mitigate the impact of the BAR. The indicative details of these bunds have been developed through workshops, and the following matters have been considered:</p> <ul style="list-style-type: none"><li>• Indicative soil volumes have been calculated to identify the likely scale of the stockpiles;</li><li>• The height of the stockpiles has been informed by these volumes, whilst ensuring they are not so high as to have their own impact on the landscape;</li><li>• The incline of the stockpiles will be appropriate ensure stability, whilst incorporating design measures (as set out below) and</li><li>• The stockpile locations have been designed around flood constraints.</li></ul> <p>The Applicant has updated the <b>Landscape Strategy Plan (Document Ref: 6.4.42)</b> to illustrate the indicative location of these soil stockpiles. The indicative design approach, as set out above, is illustrated in <b>Appendix 2 - Soil Stockpiles Indicative Cross Section</b>. It is intended to screen views of the BAR whilst limiting the extent to which the stockpiles are perceived as engineered features in a characteristically gently undulating landscape. The stockpiles will be seeded with an appropriate seed mix which will facilitate an appropriate visual association with the agricultural landscape.</p> <p>At this stage it is anticipated that the stockpiles will vary in height between approximately 0.5m and 1.0m and will be located in areas where adverse effects in relation to views of St. Andrews Church have been identified, as well as adverse visual effects on PRoW. The stockpiles have been placed in a manner to screen the BAR in views from the west and south, when looking across the BAR towards Asgarby Church and Hall.</p> <p>The approach to the design of the stockpiles is to create a 'false cutting' using an asymmetric soil profile with a relatively gentle slope to the external aspects of the road corridor and a steeper slope adjacent to the road. This is a method used within designed parkland landscapes; the slope on the viewer's side takes the view across the mound and then the road, giving the impression of a continuous uninterrupted view across the landscape (often referred to as a ha ha). This will reduce the visibility of the BAR in views from the west and the south, in particular views from PRoW KkLT/4/2 and the A17.</p> <p>During the decommissioning phase the soil stockpiles will be reinstated, following appropriate environmental standards and guidance as set out within the <b>Outline Soil Management Plan (Document Ref: 6.3.95)</b> and secured by <b>Requirement 16 of the Draft DCO (Document Ref: 3.1)</b>.</p>
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			<p><b>Appendix 1 of the Design and Access Approach Document (DAD) (AS-019)</b> outlines the ES Design Parameters and Additional Design Principles for the BAR (Work No.8), which contribute to keeping the impact of the BAR to a minimum during its operation. These parameters and principles will be adhered to and secured within requirement 5 of the <b>Draft DCO (Document Ref: 3.1)</b>. The Outline Design Principles within the DAD confirm that the BAR will in general have the appearance of a farm track or rural driveway, though wider, with type 1 granular surfacing. Street lighting, road markings and other street furniture are not proposed except at times or in locations strictly required for safety purposes.</p> <p>Measures outlined within Appendix 2.3 Embedded Mitigation (APP-076) have been put in place in order to mitigate environmental impacts of the BAR, such as reinstatement of vegetation and hedgerows lost during the construction of the BAR, which is secured within the <b>Outline Landscape and Ecological Management Plan ('OLEMP') (Document Ref: 6.3.19)</b>.</p>
HEN.2.2	Applicant	<p>The ExA notes that the applicant is expecting to provide a response to ISH2 Action 8 in Table 3.1 of [REP4-026] in relation to views from the top of Kyme Tower at Deadline 5. However, the ExA would like to confirm that, having had the opportunity to carry out a Access Required Site Inspection to Kyme Tower and experience views from the top of the tower, the ExA does believe that the proposed solar array area may be visible from the top of the Kyme Tower and therefore does urge the applicant to consider this issue and provide a response to this matter at Deadline 5.</p>	<p>The Applicant had not previously entered Kyme Tower due consultation with Historic England confirming that it was not accessible to the public and that the floors and roof had been removed. Following ISH2, when it was confirmed that access is possible with permission from the landowner, the Applicant surveyed externally and internally. This is detailed with the Kyme Tower Heritage Appraisal (<b>Applicant's Responses to Remaining Action Points (Document Ref: 9.18)</b>) which has concluded that the tower is subject to the landowner's permission; and that any future public access should also be subject to health and safety considerations due to the condition of the tower and the lack of safety provisions.</p> <p>The Applicant's heritage advisors have undertaken a site inspection and have identified that distant views of the Solar Array Area are available from the top floor of the turret tower. However, it was noted from the site inspection that the condition of the tower would not allow for safe and adequate visits from the public to experience these views. Safety concerns include the condition of the steps, lack of a handrail, and lack of lighting. In addition, there is water ingress emanating down from the roof within both the main tower and the turret tower. Any future public access to this designated heritage asset would need to comply with Historic England's conservation principles and Health and Safety regulations.</p> <p>As detailed above, the Applicant has prepared the Kyme Tower Heritage Appraisal (<b>Applicant's Responses to Remaining Action Points (Document Ref: 9.18)</b>) to provide supplementary information on the significance and setting of Kyme tower and its association with the manor house, the church and the surrounding landscape. The Applicant has considered Historic England's 'The Setting of Heritage Assets' (2017) within the appraisal. The views identified during the visit have been considered as part of the appraisal. Views from the base of the tower and the first floor, and glimpsed views from a window at the top of the turret tower have been considered. These views would not be readily publicly accessible, as set out above, thus the experience and appreciation of the views are not considered key considerations regarding the tower's setting. In addition, key views would be towards the east and south when considering the original function and design of the tower as a strategic and defensive medieval fortified manor house. Therefore, whilst</p>

			there are views, they are not key views and the effect on setting and its contribution to significance is considered slight adverse.
HEN.2.3	Applicant	In Table 8.11 of Chapter 8 of the ES [APP-059] the applicant assesses that the permanent and irreversible removal of the Victorian Pumping Station in N1 would not constitute a significant effect as this would be preserved by record. Can the applicant please clarify its reasoning in relation to this assessment?	<p>The area where the Victorian Pumping Station is identified on the Historic Environment Record has been subject to archaeological evaluation, comprising a geophysical survey followed by trial trenching. No evidence of the pumping station was found during this evaluation. The pumping station may have been entirely removed during demolition, or may be deeper below ground than trenching extended to. Although <b>ES Chapter 8 (APP-059)</b> considered a worst case scenario in terms of potential impact, it is likely the Proposed Development will not harm the pumping station (either due to it being entirely removed, too far below ground, or outside of the Order Limits).</p> <p>Notwithstanding this, the <b>Archaeological Mitigation Strategy (APP-153)</b> details the next steps should the pumping station be revealed during the construction of the Proposed Development, which will ensure any impact is appropriately mitigated. The measures within the AMS have been agreed with LCC.</p> <p>Paragraph 5.9.33 of EN-1 states that <i>"In weighing applications that directly or indirectly affect 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."</i> As set out in Section 7 of the <b>Planning Statement (Document Ref. 5.5)</b> it is considered that any harm is outweighed by the benefits of the Proposed Development.</p>
HEN.2.4	Applicant, HLAs	Following from ISH2 and the concerns raised by LCC in relation to the applicant's assessment of Farmstead in the ES, the ExA notes that the applicant will submit a response at Deadline 5.	The Applicant has undertaken a group value assessment of farmsteads in response to North Kesteven District Council's request. This is presented within Non-Designated Farmstead Appraisal ( <b>Applicant's Responses to Remaining Action Points (Document Ref: 9.18)</b> ).
Landscape and Visual			
LSV.2.1	Applicant	In the applicant's response to ISH2 Action 3 in Table 3.1 of [REP4-026] and in relation to the effects of the proposed development on the principal (northern) elevation of Gashes Barn (R4), the applicant states that it sought to maintain some perception of openness and that the mixed species hedge proposed would be managed to a maximum height of 3.5 metres. The applicant goes on to state that the intention of this hedgerow is to screen views of solar panels whilst allowing longer distance views of the wider landscape. Considering Figure R4 Photomontages [AS-031] does show a solid hedgerow along the northern boundary of Gashes Barn with the proposed development, can the applicant please clarify how it considers that the proposed mitigation maintains some perception of openness?	<p>The approach to the mitigation planting, as illustrated in <b>Figure 6.31 Landscape Strategy Plan (Document Ref: 6.4.42)</b>, at Gashes Barn has been developed in association with advice from the Proposed Development's Heritage Consultant, as set out within the response to GCT.2.1 above, and within the response to item 13.52 in the <b>Applicants Comments on Local Impact Reports (REP2-041)</b>. In relation to the property as a whole it was determined that the northern elevation was the principal elevation and that this elevation should not be enclosed by taller shrub or woodland planting. This advice accords with landscape analysis which found that the northern elevation is the most open aspect. Other aspects of the property are more strongly influenced by the presence of outbuildings, structure and planting.</p> <p>This context has influenced the mitigation planting design which has also been informed by the existing landscape pattern and the intention to reinforce existing field boundaries and associated drainage channels and hedgerows. In this respect, the proposed hedgerow to the north of Gashes Barn is aligned with, and immediately to the north of, an existing drainage channel which defines the southern extent of the field units to the north. This hedgerow is located</p>

			<p>approximately 140m to the north of the property at the closest point. The intervening area largely comprises open grassland which is utilised for agricultural purposes (hay crop). There is also some existing planting within this area, including a hedgerow to the east and immature avenue tree planting defining the driveway. It can therefore be demonstrated that there is a considerable offset of largely open land between the property and the hedgerow which, in relation to the relatively low height of planting (a maximum of 3.5m), will not be overbearing and will allow some perception of openness to be maintained. Similar principals have informed the planting design for the access road where an approximately 15m offset from the road to the Order Limits which is defined by a proposed hedgerow as illustrated in the <b>Figure 6.31 Landscape Strategy Plan (Document Ref: 6.4.42)</b> The offset has been introduced so that the visual experience for residents is not dominated by the hedgerow as they travel along the route, whilst also screening views of energy infrastructure.</p> <p>Although relatively open, the wider visual context is influenced by the presence of existing vegetation including the hedgerow which defines the northern extent of the Solar Array Area and the mature tree cover which defines the skyline. The design intention is that the hedgerows to the north of Gashes Barn will screen views of solar panels whilst being assimilated into this wider context and that views will continue to be defined by long distance visibility of mature tree cover, rather than being totally foreshortened.</p> <p>It is acknowledged that the visual characteristics of views will be fundamentally changed and this is demonstrated in the conclusions reported in <b>Chapter 6 Landscape and Visual (Document Ref: 6.2 ES Vol. 1, 6.2.6), Appendix 6.4 Visual Assessment (APP-086) and Appendix 6.5 RVAA (APP-087)</b>. The assessment has found that there will be significant residual visual effects for residents at Gashes Barn because of the change introduced by the Proposed Development including the mitigation planting.</p> <p>Sections 7.4 – 7.6 of the <b>Planning Statement (APP-277)</b> outline how the adverse effects of the Proposed Development are considerably outweighed by its benefits, which include renewable energy generating capacity for which there is an established need case set out in NPS EN-1 and wider government policy and strategy. The effects on Gashes Barn are described in Section 7.5 of the <b>Planning Statement (APP-277)</b>, which acknowledges that the residential amenity threshold would be reached at various stages but notes that this is not a EIA impact but relates to wider planning principles. NPS policy does not establish any test or principle that impacts must be avoided; it describes the assessment, design and screening with regard to avoiding and minimising landscape and visual effects in line with the mitigation hierarchy. It is therefore considered that NPS policy is complied with. Nevertheless, in the event that it was not considered to be complied, Critical National Priority would override the specified residual effect since the mitigation hierarchy has been set out.</p>
LSV.2.2	Applicant	The applicant's response to ISH2 Action 3 in Table 3.1 of [REP4-026] refers the ExA to Figure R4 Photomontages [AS-031] as illustration of the effects of the proposed development on Gashes Barn. However, and as acknowledge by the applicant in its response, Figure R4 Photomontages [AS-031] provide a view of the proposed	<p>By way of explanation, the northern elevation was selected for the photomontage because it is the principal elevation and represents the most open views available from the property. The southern elevation is not as open; however, the Applicant will prepare a photomontage of the southern elevation, to be submitted at Deadline 6.</p>



		development from the northern elevation only. Considering that Gashes Barn would be surrounded on all four sides by the proposed solar array, can the applicant please provide photomontages of views from all other elevations?	Photomontages have not been provided from the other elevations as it is not appropriate. The explanation for this is provided in the Applicant's response to LSV 2.3, below.
LSV.2.3	Applicant	Following from LSV.2.2, if the applicant is not able to provide photomontages of views from all other elevations of Gashes Barn and these were not done for the applicant's assessment, can the applicant please clarify how it was able to assess the effects of the proposed development on Gashes Barn as a whole (i.e. what work has been done in order to assess the visual effects of the proposed development on the southern, eastern and western elevations of the property) and how the visual amenity would look like for any residents or occupiers?	<p>The Applicant can confirm that the assessment of visual effects at Gashes Barn reported in <b>Chapter 6 Landscape and Visual (Document Ref: 6.2 ES Vol. 1, 6.2.6), Appendix 6.4 Visual Assessment (APP-086) and Appendix 6.5 RVAA (APP-087)</b> has not relied on the use of photomontages. Instead, the assessment has been based on visual analysis informed by site surveys and an appreciation of the landscape context. The use of photomontages is helpful in understanding the nature of visual change but is not necessarily required from all aspects of a property to undertake a robust visual assessment, on the basis that the assessment should be proportionate and in acknowledgement that viewpoints/visualisations cannot be provided from all areas where visual effects are anticipated.</p> <p>In relation to Gashes Barn, it has been found that views from the other elevations are less open (please also refer to the Applicant's response to ExA question LSV 1.10 in the <b>Applicant's Responses to Examining Authority's First Questions (ExQ1) (REP2-040)</b> and the Applicant's response to Action Point 3 in <b>Written Summary of Oral Submissions from Issue Specific Hearing 2 (ISH) and Responses to Action Points (REP4-026)</b>). These responses set out that the views from other elevations of the property are all influenced by the presence of external buildings, structures and vegetation which is summarised as follows.</p> <ul style="list-style-type: none"> <li>• The eastern and western elevations have a limited number of windows which are at first floor level and therefore do not represent views from the principal living areas of the property. Views are also partially restricted from these elevations by the presence of sheds and outbuildings.</li> <li>• To the south the landholding associated with Gashes Barn is subdivided using timber post and rail/stockproof fencing with a remnant hedgerow partially defining the interface with the Order Limits. A stable block is present to the south east of the property which provides considerable visual enclosure to this aspect. The background is defined by mature vegetation cover on the skyline which would provide the backdrop in views of the Proposed Development. These factors combine to provide a less open visual experience from this southern elevation where solar panels would feature less prominently in the view. A photomontage from this southern elevation will be prepared and submitted at Deadline 6.</li> </ul> <p>In assessing how the residential visual amenity of residents would be affected by the Proposed Development the all-round visual experience of residents as they use internal and external spaces and as they access the property have been considered in accordance with <b>Appendix 6.2 Landscape and Visual Methodology (APP-084)</b>. This methodology has also been informed by the Landscape Institute Technical Guidance Note 2/19, Residential Visual Amenity Assessment (RVAA), (March 2019).</p>
LSV.2.4	Applicant	Although the ExA agrees, to an extent, with the applicant's assertion that the principal elevation of the proposed development is the northern elevation and the ExA	The Applicant also refers the ExA to its response to ExAQ2 LSV 2.1 above, where the proposed mitigation planting is discussed in relation to openness.



		<p>recognises that some consideration has been given to buffers and its efficacy in protecting views from that specific elevation, doesn't the applicant believe that the cumulative effects of the proposed mitigation measures will be greater than the sum of its parts and potentially overbearing? And if not, why not?</p>	<p>The Applicant recognises that the introduction of the mitigation planting will have adverse effects for the visual characteristics of views from Gashes Barn. This is reflected in the finding of there being Significant adverse residual effects predicted for residential receptors at the property. The Applicant has explained in the response to ExAQ2 LSV 2.1 above that there is a substantial offset distance from the property to any proposed solar panels and that this separation distance will help to ensure that any proposed mitigation planting will not be overbearing or provide the sense that the property is overly enclosed with no wider visibility. In addition, the Applicant considers that following establishment of this mitigation planting, views of energy infrastructure will be comprehensively screened and that views of naturalistic landscape elements will be preferable to unscreened views of solar panels.</p> <p>The Applicant also considers that this mitigation planting has been designed to relate to the underlying landscape pattern providing improved linkages with existing dispersed areas of woodland scrub and hedgerows across the wider Solar Array Area and reducing fragmentation. The provision of natural buffers in the form of hedgerows and trees is supported by national policy, with paragraph 4.6.6 of NPS EN-1 stating that <i>"Energy NSIP proposals should seek opportunities to contribute to and enhance the natural environment by providing net gains for biodiversity, and the wider environment where possible"</i>.</p>
LSV.2.5	Applicant	<p>The applicant's response to ISH2 Action 1 in Table 3.1 of [REP4-026] states that the requirement for HGVs to pass each other determined the proposed carriageway width as well as the requirements for Abnormal Indivisible Loads (AILs) with the swept path analysis (vehicle tracking) on the preliminary design alignment, shown on the Bespoke Access Road Construction Method Statement [APP-075], indicates a carriageway width of up to 8m will be required at bends in the carriageway for this purpose. Can the applicant please clarify how likely it is that the full 8m carriageway width will be needed during operation phase? And if needed, has the applicant considered any mitigation?</p>	<p>The full width of the Bespoke Access Road will be required in the event of equipment failure to facilitate movement of AILs, or during other equipment replacement, to allow HGVs to pass. In relation to the potential for equipment failure, <b>ISH2 Action Point 1 in Table 3.1 of [REP4-026]</b> highlights that <i>"While the exact frequency of such occurrences is variable, given the 40-year operational lifespan of the Proposed Development, it is likely that at least one HV transformer will require replacement"</i>. It is therefore likely that at least 1 AIL will require the full 8m width of the Bespoke Access Road, at least once during the operational phase.</p> <p>For general equipment replacement, whilst traffic volumes are likely to be substantially lower during equipment replacement than during construction, there will still be a requirement either for HGVs to pass on the Bespoke Access Road carriageway, or if reduced in width, for passing places to be made available. Therefore, even though the full width of the BAR is not going to be in constant use during operation, any requirement for its need during operation would result in repeated construction and decommissioning activities needing to take place. During decommissioning of parts of the road, these construction activities include formation of compounds, erection of fencing, excavation and removal of stone from the site, reinstatement of ground in place of the removed road material using material from stockpiles, and removal of compounds. During recommissioning, compounds will be reformed, stone will be brought back to site, the ground re-excavated, new stockpiles formed (or material removed from site, stone laid and compacted, and compounds removed.</p> <p>As reported in <b>Action 1 of Table 3.1 in Written Summary of Oral Submissions from Issue Specific Hearing 2 and Responses to Action Points (REP4-026)</b>, any temporary changes to the BAR during operation and decommissioning would</p>

			<p>result in adverse impacts due to the requirement to decommission, recommission and then decommission the BAR again. The effects of these works would be up to the level of effects identified within the ES for the construction and decommissioning phases of the BAR. It is considered that over the lifetime of the Proposed Development, these repeated construction and decommissioning effects would likely be greater than the effects of the BAR being left in situ during operation.</p> <p>The Applicant has updated the <b>Landscape Strategy Plan (Document Ref: 6.4.42)</b> to illustrate the indicative location of soil stockpiles. These stockpiles have been placed within the Bespoke Access Corridor to provide landscape and visual mitigation. At this stage it is anticipated that the stockpiles will vary in height between approximately 0.5m and 1.0m and will be located in areas where adverse visual effects have been identified. These effects principally relate to users of the public rights of way network (PRoW) but also in relation to views of St. Andrews Church. The approach to the design of the stockpiles is to create a 'false cutting' using an asymmetric soil profile with a relatively gentle slope to the external aspects of the road corridor and a steeper slope adjacent to the road. This approach is illustrated in <b>Appendix 2</b> of this document (<b>Soil Stockpiles Indicative Cross Section</b>) and is intended to screen views of the BAR whilst limiting the extent to which the stockpiles are perceived as engineered features in a characteristically gently undulating landscape. The stockpiles will be seeded with an appropriate seed mix which will facilitate an appropriate visual association with the agricultural landscape. This approach will contribute to keeping the impact of the BAR to a minimum during both construction and operation. These parameters and principles will be adhered to and secured within requirement 5 of the <b>Draft Development Consent Order (Document Ref: 3.1)</b>.</p>
Land Use			
LUS.2.1	Applicant	At ISH3 LCC raised concerns regarding the applicant's approach to Land Use, particularly in relation to the cumulative effects of the proposal on agricultural land. The ExA notes that the applicant is proposing to provide an update on this topic, as well as an update on the effects of recently granted DCOs on the proposed development, at Deadline 5.	The Applicant has addressed this point in its response to <b>ISH 3 Action Point 7 in Applicant's Responses to Remaining Action Points (Document Ref: 9.18)</b> .
Socio-economics			
SEC.2.1	Applicant, HLAs	The ExA notes the applicant's response to ISH3 Action 8 in Table 3.1 of [REP-027] and notes the applicant's statement that due to the low level of effect identified in relation to the economic displacement of farming activities in isolation, potentially significant cumulative effects on this aspect were not considered likely. This is obviously at odds with the LCC's concerns and post ISH3 submission [REP4-030] which raises concerns, not only on how BMV Land has been calculated, but also the overall amount of BMV land affected and impact on the local agricultural economy. In addition to the work described in LUS.2.1 can the applicant also clarify how it has arrived to its conclusions in relation to the impact of the proposed development on the local agricultural economy and how it has been assessed and accounted for as part of the applicant's assessment?	As explained in <b>Appendix 1.1 Scoping Report (APP-071)</b> , socioeconomic impacts were assessed using IAIA (2015) guidance, which does not require analysis of supply chain effects. However, as part of its assessment in the ES, the Applicant considered potential impacts on the agricultural economy, by scoping in loss of livelihoods and jobs, as well as indirect employment gross value added (referenced in Table 13.1 of the <b>Scoping Report (APP-071)</b> as <i>Restricted access to land and economic displacement of farming activities and Generation of local employment, procurement of goods and services and contribution to economy</i> ). There were no requests for an assessment of the impacts on the local agricultural economy made during scoping ( <b>Appendix 1.2 Scoping Opinion (APP-072)</b> ) or statutory consultation on the Preliminary Environmental Impact Report. Nevertheless, the Applicant continued to review the potential for supply chain effects on the local

			<p>agricultural economy throughout the EIA in case new information arose, and the scope of the assessment needed to be adjusted from that agreed within the Scoping Report and Scoping Opinion.</p> <p>Notably, the outcomes of the soils assessment (<b>Chapter 14 Soils (APP-065)</b>) were reviewed to determine whether there was the potential for secondary socioeconomic effects. Overall 589.85ha of agricultural land—of which 328.09ha is BMV—will be affected by the Proposed Development. This represents less than 0.5% of all agricultural land in Lincolnshire, and less than 0.1% of BMV land in Lincolnshire. Such percentage is not expected to create a measurable change to the region's agricultural economy, so broader economic impacts were deemed to remain outside the scope of Chapter 15 Socio-economics (APP-066). In this way the impact of the Proposed Development on the local agricultural economy has been accounted for, however, any impact was not of a magnitude that required further assessment in the ES.</p>
Water environment and flood risk			
WFR.2.1	Applicant, Environment Agency	<p>Following from ISH3, the ExA requests an update from the applicant and the Environment Agency in relation to flood risk and the applicant's approach to flood risk. The ExA also wishes to highlight the need for both parties to reach agreement on this matter with enough time left in the examination to properly scrutinise and assess the effects of the proposal on flood risk. If this is not the case and agreement is not reached early enough as to allow for appropriate consideration, the ExA's recommendation report will have to reflect that.</p>	<p>The Applicant and the Environment Agency ('EA') have been working closely since ISH3 to address the outstanding flood risk matters and this response represents a jointly agreed position statement from the Applicant and the EA. Details of the consultation undertaken are detailed within the draft Statement of Common Ground (SoCG) between the Applicant and the EA, submitted at D5 (<b>Document Ref: 8.9</b>). To summarise, the EA provided comment on the updated draft <b>Flood Risk Assessment (APP-162)</b> to the Applicant on 17 November and a virtual meeting was held to discuss outstanding matters on 18 November. Since then, the <b>Flood Risk Assessment (APP-162)</b> has been further updated to include the finalised flood modelling results and to address the associated outstanding EA concerns. The updated draft Flood Risk Assessment was issued to the EA on 8 December for review ahead of D5. The EA provided comments on the draft document during a virtual meeting held between the EA and Applicant on 16 December. The following flood risk related EA Relevant Representation comments were mutually agreed as being addressed, subject to the updated Flood Risk Assessment being formally submitted into the Examination: EA03, EA23, EA27, EA28, EA29, and EA30.</p> <p>Outstanding matters relating to EA01, EA02, EA21, EA24, EA25 and EA26 were discussed at the virtual meeting held on 16 December and agreement reached on how these could be resolved. The updated Flood Risk Assessment submitted at Deadline 5 aims to address all outstanding flood risk matters raised by the Environment Agency, as per the approach agreed within the meeting. However, formal agreement will be documented in a further iteration of the SoCG between the Applicant and the EA at a future deadline.</p>
Cumulative effects			
CU.2.1	Applicant, HLAs	<p>The ExA notes the applicant's response to ISH3 Action 10 in Table 3.1 of [REP-027] and its intention to submit an updated version of Chapter 18 of the ES Cumulative Effects at Deadline 5. The ExA will therefore pose any questions that may remain at ExQ3, Monday 26 January.</p>	<p>In response to ISH3 Action 10 the Applicant has evaluated the additional schemes identified by Lincolnshire County Council, North Kesteven District Council and Boston Borough Council. This evaluation is presented within <b>Technical Note: Cumulative Effects Assessment Updated (Document Ref: 9.21)</b>. The additional schemes either have already been considered within the CEA; are not likely to result in significant effects with the Proposed Development; or currently have</p>

insufficient information available to undertake a meaningful assessment of potential cumulative effects. Therefore, it is not considered that an update to the CEA is required.

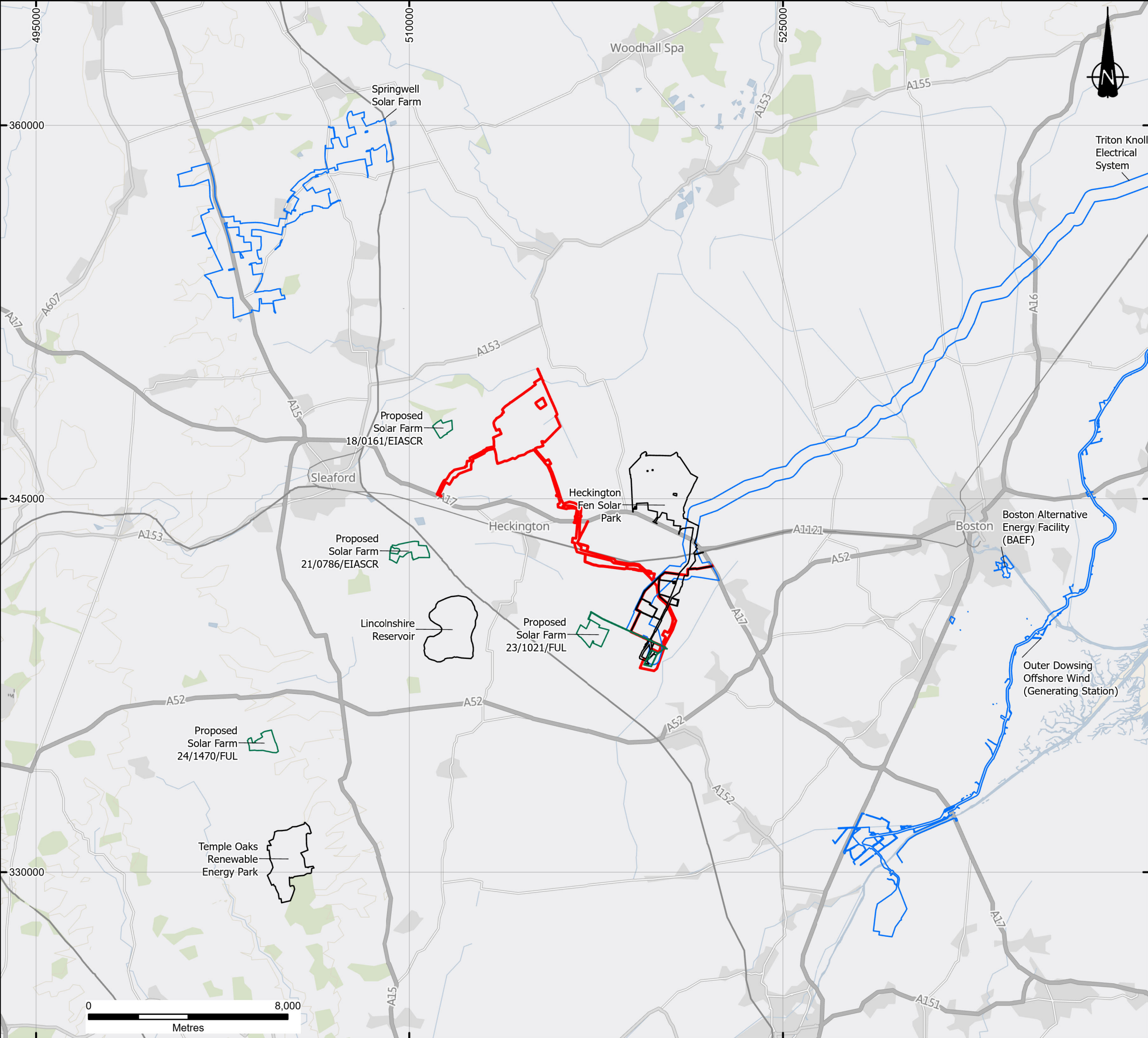
# Appendix 1: Individual responses to the REIS



Applicant's Response to Report on the Implications for European Sites (REIS)

ID	Question to:	Question:	Applicant's Response:
n/a	Applicant	Please provide a figure showing the location the projects included in table 5 of APP-050.	The Applicant has produced a figure, appended below (Habitat Regulations Assessment: Plans and Projects with the Potential for In-Combination Effects, Drawing No. ST19595-548) showing the location of each of these projects.
n/a	Applicant	Can the applicant confirm whether there are any implications to European Sites or the HRA report arising from these projects.	The Applicant has reviewed the additional projects highlighted by Lincolnshire County Council, North Kesteven District Council and Boston Borough Council within <b>Technical Note: Cumulative Effects Assessment Update (Document Ref: 9.21)</b> . One project Land at Little Hale Fen (NKDC ref 23/1021/FUL), approved following an appeal had been considered previously within the HRA ( <b>REP2-013</b> ), and no new ecological information has been provided since this review. All other projects were discounted due to distance from the Site and/or the fact that their construction timings did not overlap with the Proposed Development so impacts could not occur at the same time.
2.3.2	NE, EA and the Applicant	<p><b>Mitigation in the outline Construction Environmental Management Plan</b></p> <p>The ExA [PD-007] sought views from the ANCBs and other IPs as to whether the measures as set out in the oCEMP were sufficiently detailed to be relied upon.</p> <p>NE [REP2-059] noted that it was satisfied with the level of information contained.</p> <p>EA [REP2-047] set out that the level of information was currently insufficient and set out details of changes it sought. The Inspectorate is of a view that these changes do not relate to mitigation relied upon in relation to LSE identified under the HRA Regulations.</p> <p>Please confirm, in your view, whether any of the concerns raised by the EA in [REP2-047] in response to ExQ1 WFR 1.2 relate to mitigation relied upon under the HRA regulations. If so, please explain what is required to progress this matter.</p>	Following the concerns raised by the EA in <b>REP2-047</b> in response to ExQ1 WFR 1.2 the Applicant has updated the Outline Construction Environmental Management Plan (OCEMP) ( <b>Document Ref: 6.3.7</b> ) which has been re-submitted at deadline 5 with updates to Sections 6.11.22 and 6.11.25-6.11.29. The EA has reviewed these changes as draft versions and confirmed (via letter received 17 <sup>th</sup> November 2025) they are satisfied with them, subject to their formal inclusion in the OCEMP in Examination. Notwithstanding, the Applicant considers the mitigation provided in the oCEMP prior to Deadline 5 to be sufficient to reach conclusions on Adverse Effects on Integrity (AEoI) on the Wash SPA or the Wash and North Norfolk coast SAC.
2.3.5	NKDC and the Applicant	<p><b>LSE on Gadwall</b></p> <p>Concerns were raised by North Kesteven District Council [REP3-010] in relation to whether a 70dB threshold for Gadwall would mitigate LSE. This was previously stated in the Local Impact Report [REP1-054].</p> <p>NE [RR-015] noted agreement with the proposed mitigation measures.</p> <p>Question to NKDC and the applicant, has any further discussion taken place to secure agreement on this matter?</p>	The Applicant held a meeting with NKDC on 14 <sup>th</sup> August 2025 when this point was discussed and NKDC asked if Natural England's view on the matter. It was confirmed to NKDC that Natural England were satisfied with this approach for Gadwall. Agreement has now been secured on this matters as confirmed within <b>REP3-010</b> , which has this point marked as ' <i>resolved as of 30.10.2025</i> '.
3.1.2	NE and the Applicant	<p><b>Gadwall</b></p> <p>NE note that agreement to conclusions on AEoI for the Wash SPA and Ramsar could not be provided in the relevant representation as a few</p>	The Applicant has held meetings with Natural England to discuss the outstanding conclusions of AEoI on the Wash SPA, most recently on 5 <sup>th</sup> November 2025. This discussion covered AEoI for the qualifying features of gadwall and lapwing. An

ID	Question to:	Question:	Applicant's Response:
		<p>queries remained outstanding in relation to the screening assessment [REP1-051]. This matter was not discussed further.</p> <p>Question to NE and the applicant, can NE provide its view on the conclusions on AEoI for the qualifying feature of Gadwall. Where disagreement remains, this should be set out.</p>	<p>approach was agreed whereby an Ecological/Environmental Clerk of Works will monitor the working area for these species and move works on temporarily when there is likely to be a significant adverse impact until gadwall and lapwing leave the area where they may be impacted (anticipated to be up to one week). Natural England are satisfied with the proposed mitigation in principle (subject to detail being included within the updated HRA to be submitted at deadline 6) which was confirmed in their updated Risk And Issues Log received 11<sup>th</sup> November 2025.</p>
3.1.3	NE and the Applicant	<p>In response, to request from NE for the applicant to consider Lapwing, the applicant provided an updated HRA [REP2-013] which considered that there was potential for LSE.</p> <p>This was therefore considered at stage 2 of the HRA (Appropriate Assessment) where mitigation in the form of a buffer, November to February has been secured (similar to that for Gadwall (see above)). Following this mitigation, the applicant concluded no AEoI.</p> <p>Question to NE and the applicant, can NE provide its view on the conclusions on AEoI for the qualifying feature of Lapwing. Where disagreement remains, this should be set out.</p>	



**KEY**

DCO Order Limits

Indicative NSIP Boundary

Indicative Planning Application Boundary

NSIP Boundary

**Notes:**

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

NSIP Boundary data received on 27/08/2025 through Freedom of Information Act request to the planning inspectorate on 01/08/2025.

Indicative NSIP Boundaries and Indicative Planning Applications Boundaries have been approximately digitised from respective application plans for illustrative purposes only, is indicative and may not represent the precise representation of the boundaries for these schemes. Wardell Armstrong (Part of SLR) accepts no responsibility or liability for the accuracy of such information. For accurate project information see official application documentation.

For NSIPs, see <https://national-infrastructure-consenting.planninginspectorate.gov.uk/>.

For Planning Applications, see <https://planningonline.n-kesteven.gov.uk/online-applications/>

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1	FIRST ISSUE	19/12/25	BL	SR	SR
REVISION	DETAILS	DATE	DRAWN	CHKD	APPD

CLIENT

BEACON FEN ENERGY PARK LTD

PROJECT

BEACON FEN ENERGY PARK

DRAWING TITLE

HABITAT REGULATIONS ASSESSMENT:  
PLANS AND PROJECTS WITH THE POTENTIAL  
FOR IN-COMBINATION EFFECTS

DRG No.	ST19595-548	REV	1	SUIT. CODE	--
DRG SIZE	A3	SCALE	1:150,000	DATE	19/12/2025
DRAWN BY	BL	CHECKED BY	SR	APPROVED BY	SR

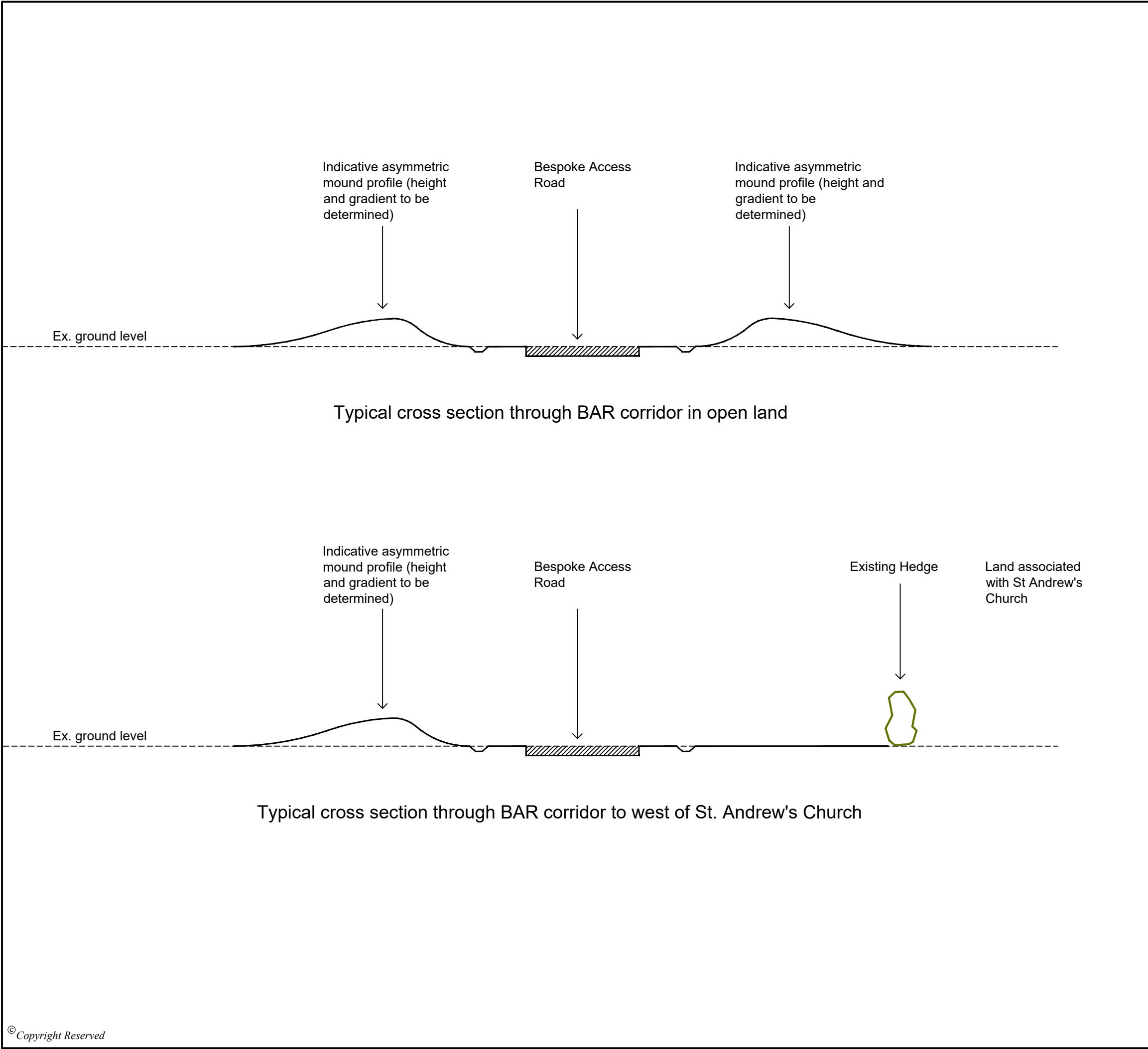


wardell  
armstrong


PART OF SLR



## **Appendix 2: Soil Stockpiles Indicative Cross Section**



DO NOT SCALE FROM THIS DRAWING

REVISION	DETAILS	DATE	DRN	CHK'D	APP'D
CLIENT BEACON FEN ENERGY PARK LTD					
PROJECT BEACON FEN ENERGY PARK					
DRAWING TITLE SOIL STOCKPILES INDICATIVE CROSS SECTIONS					
DRG No. ST19595-551		REV 1	SUIT. CODE		
DRG SIZE A3		SCALE 1:200	DATE 12/12/25		
DRAWN BY DS		CHECKED BY LG	APPROVED BY SR		
 PART OF 