



BEACON FEN ENERGY PARK

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Statement of Common Ground (~~Draft~~Final) with Boston Borough Council
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Glossary

Abbreviation	Description
2008 Act	Planning Act 2008
AC	Alternating Current
AIS	Air Insulated Switchgear
Applicant'	Beacon Fen Energy Park Ltd
Application	The application
Ardent Management	Ardent Management Limited
BBC	Boston Borough Council
BESS	Battery energy storage system
BMV	Best and Most Versatile
DC	Direct Current
DCO	Development Consent Order
DWD	DWD Property & Planning Limited
EA	Environment Agency
ES	Environmental Statement
GIS	Gas Insulated Switchgear
HSF Kramer	Herbert Smith Freehills Kramer LLP
HV	High Voltage
LCC	Lincolnshire County Council
Low Carbon	Low Carbon Ltd
MW	Megawatts
NGET	National Grid Electricity Transmission Plc
NGR	National Grid Reference
NKDC	North Kesteven District Council
NPSs	National Policy Statements
NSIP	Nationally Significant Infrastructure Project
oCEMP	Outline Construction Environment Management Plan
Order	The Beacon Fen Energy Park Order
oSMP	Outline Soil Management Plan
OSSCEP	Outline Skills, Supply Chain and Employment Plan
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
SELLP	South East Lincolnshire Local Plan

Abbreviation	Description
Site	An area sited approximately 6.5 km northeast of the village of Sleaford and 2.5 km north of Heckington
SLR	SLR Consulting
SoCC	Statement of Community Consultation
SoCG	Statement of Common Ground
SoS	Secretary of State

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1. Introduction

1.1 Overview

- 1.1.1 This Statement of Common Ground ('SoCG') with Boston Borough Council ('BBC') (**Document Ref. 8.3**) has been prepared on behalf of Beacon Fen Energy Park Ltd (the 'Applicant'). It relates to the application (the 'Application') for a Development Consent Order ('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 The Applicant is seeking development consent for a ground-mounted solar photovoltaic ('PV') electricity generation and battery energy storage system ('BESS'), together with associated grid connection infrastructure (the 'Proposed Development'), at an area sited approximately 6.5 km northeast of the village of Sleaford and 2.5 km north of Heckington (the 'Site'). The Proposed Development would have a generation capacity of approximately 400 megawatts ('MW') of electricity, with a 600MW BESS.
- 1.1.3 The Site corresponds to the entire Order Limits and represents the entire land area required for construction, operation and decommissioning of the Proposed Development. It is made up of the Solar Array Area (comprising the solar PV and BESS infrastructure) the Cable Route Corridor (comprising an electrical connection from the Solar Array Area to the Bicker Fen National Grid 400kV substation) and the Bespoke Access Corridor (for a bespoke access from the A17 to the Solar Array Area). This is termed the Bespoke Access Road.
- 1.1.4 The Proposed Development falls within the definition of a 'Nationally Significant Infrastructure Project' ('NSIP') under Section 14(1)(a) and Sections 15(1) and (2) of the 2008 Act, as it is an onshore generating station in England that would have a generating capacity greater than 50MW electrical output. As such, a DCO application is required to authorise the Proposed Development in accordance with Section 31 of the 2008 Act.
- 1.1.5 The DCO, if made by the SoS, would be known as 'The Beacon Fen Energy Park Order 202' (the 'Order').

1.2 The Applicant

- 1.2.1 The Applicant is a subsidiary of Low Carbon Ltd ('Low Carbon'). Low Carbon is a privately-owned global renewable energy company.

1.3 The Site

- 1.3.1 The Site represents the entire Order Limits and is located east of Sleaford in Lincolnshire. It extends to approximately 758ha and comprises of three functional areas: the Solar Array Area, the Cable Route Corridor and the Bespoke Access Corridor.

Solar Array Area

- 1.3.2 The Solar Array Area is approximately 529ha in size and located to the north of Heckington, centred at the National Grid Reference ('NGR') 514682 347825. The Solar Array Area is located wholly within the administrative areas of North Kesteven District Council ('NKDC') and Lincolnshire County Council ('LCC').
- 1.3.3 The Solar Array Area predominantly comprises agricultural land in arable use, divided by ditches with sparse tree cover that is limited to small woodland blocks and scattered hedgerow trees. A small reservoir is located in the south-west of the Solar Array Area.
- 1.3.4 The Solar Array Area is bound to the south, west and north by local highways, and bound to the east by the Car Dyke. Public Right of Way ('PRoW') Ewer/12/1 extends across the north-eastern corner of the Site, close to the northern Site boundary. There are no other PRoW within the Solar Array Area.
- 1.3.5 Villages in proximity to the Solar Array Area include:
- Howell immediately to the south-west, with Heckington c. 1.7km beyond;
 - Ewerby Thorpe immediately to the west, with Ewerby c. 1.1km beyond;
 - Anwick c. 2.7km to the north-west;
 - North Kyme c. 2.4km to the north; and
 - South Kyme c. 1.5km to the east.

Cable Route Corridor

- 1.3.6 The Cable Route Corridor is approximately 183 ha in size and extends c. 13km south-east from the Solar Array Area to Bicker Fen substation, at NGR TF 19684 38599. The Cable Route Corridor is located wholly within the administrative area of LCC. The majority of the Cable Route Corridor is located within the administrative area of NKDC, however the southern section is located within BBC's administrative area.
- 1.3.7 Land use within the Cable Route Corridor is predominantly agricultural. A number of local highways cross the Cable Route Corridor, and the A17 crosses east to west within the north-west section of the Corridor. The railway linking Heckington west to Sleaford and east to Swineshead intersects the mid-section of the Corridor. There are a number of PRoW within the Cable Route Corridor, including one alongside the South Forty Foot Drain which also crosses the Cable Route Corridor.

Bespoke Access Corridor

- 1.3.8 The Bespoke Access Corridor is approximately 45.4 ha in size comprising predominantly agricultural land and extends approximately 3km south-west from the Solar Array Area to the A17. The Bespoke Access Corridor is located wholly within the administrative areas of LCC and NKDC.
- 1.3.9 The Bespoke Access Corridor has been refined during the pre-application stage, informed by results from environmental surveys and consultation feedback.
- 1.3.10 Asgarby Road and Heckington Road cross the Bespoke Access Corridor and there are four PRoW located within the route.

1.4 The Proposed Development

- 1.4.1 The main components of the Proposed Development are summarised below and defined in Schedule 1 of the **Draft DCO (Document Ref: 3.1)**.

Solar Array Area

- 1.4.2 The Solar Array Area consists of solar PV panels and modular ground-mounting structures. The height of the panels considered will be up to 3.9m above ground level in fields to the east and 3.5m above ground level in fields to the west, south and an isolated field in the north. The proposal is for a fixed (i.e., static) panel orientation, facing due south which is commonly seen on existing UK solar farms, and angled 10° to 45° from horizontal. Supporting infrastructure includes inverters, combiner boxes, transformers and switchgear converting the Direct Current ('DC') to Alternating Current ('AC') and stepping up the voltage so it can be exported to the National Grid. An inverter, transformer and switchgear comprised together is termed a Power Conversion Unit ('PCU').
- 1.4.3 A 600MW BESS adjacent to the On-Site Substation is included in the Proposed Development within the Solar Array Area. This will allow the electricity generated by the panels to be stored on site at times when grid demand is low, then exported at times of higher demand. The BESS containers and switch rooms are anticipated to be up to 8m x 3m in size, with a height of up to 4.5m.
- 1.4.4 Low voltage onsite electrical cabling is required to connect the PV modules and BESS to the inverters, and the inverters to the onsite transformers. Higher voltage cables are required between the transformers and the switchgear and from switchgear to the substation.
- 1.4.5 A new onsite substation is proposed and would have up to four High Voltage (HV) transformers with a maximum footprint of no more than 40,000m² (e.g. 250m x 160m (or 200m x 200m)) and a height of up to 13m). The Onsite Substation will include a 33kV switchroom, control and storage buildings that would house office space and welfare facilities, as well as operational monitoring and maintenance equipment and equipment for reactive compensation and/or harmonic filtering. The design control building and office/welfare will be defined as part of detailed design.
- 1.4.6 The perimeter fence would likely comprise a standard post and wire, deer fencing up to 3m tall around the Solar Array Area. Security fencing, up to 3.4m will be installed around the Onsite Substation compound and, possibly, other infrastructure / compounds. Acoustic fencing, up to 4m tall, may be required around the BESS, subject to the detailed design and layout.
- 1.4.7 Mounted internal-facing closed circuit television (CCTV) systems will likely be deployed around the perimeter of the operational areas of the Site; anticipated to be 5m high. The CCTV cameras would have fixed view sheds and will be aligned to face along the fence. Motion detection security lighting will be used around the electrical infrastructure and potentially at other pieces of critical infrastructure.
- 1.4.8 During construction, temporary construction compounds will be required, as well as temporary roadways, to enable access to all the land within the Site.

Localised earthworks to form suitable development platform for the substation and BESS will also be required.

- 1.4.9 There will be one primary access on the western edge of the Solar Array Area and a secondary access to the north, both of which will allow large vehicles (including first responder access to the BESS and on site substation). Tertiary operational access primarily for smaller vehicles is provided to the north west and south.
- 1.4.10 PRoW Ewer/12/1 is being extended in a south and westerly direction as a permissive path terminating in the vicinity of Ewerby Thorpe and will be in place for the operational duration of the Proposed Development. The exact route of the permissive path will be determined via the discharge of requirement in the **Draft DCO (Document Ref: 3.1)**, but it is anticipated to run in a south easterly direction along Car Dyke and then heading south west on the north side of Hodge Dike. An undetermined number of footbridges (unlikely to be more than 8 in number) to cross existing watercourses will be required and will require the usual water course crossing agreements to be sought with the relevant Internal Drainage Board in parallel with the discharge of the requirement.

Cable Route

- 1.4.11 The Cable Route running between the Solar Array Area and the Bicker Fen 400kV Substation will be constructed through trenched methods and, where required, trenchless methods.
- 1.4.12 During construction, temporary construction compounds will be required approximately every 1-3 km, as well as temporary roadways, to enable access to all land. It is anticipated that there will be 6 main compounds that are distributed at approximately equal distances along the cable route to facilitate proper construction management. Smaller temporary compounds may also be located anywhere within the final working area.
- 1.4.13 Vegetation and hedgerows lost during construction of the Cable Route will be re-instated where possible subject to easement restrictions.

Bespoke Access Road

- 1.4.14 A dedicated access from the A17 to the Solar Array Area is required. The Bespoke Access Road will be constructed in advance of material construction commencing on the Solar Array Area. During construction, temporary construction compounds will be required which may be anywhere along the route.
- 1.4.15 The Bespoke Access Road will likely be the last component of the Proposed Development to be removed as it will be used to facilitate decommissioning of the Solar Array Area. Whilst it is assumed for the Environmental Statement ('ES') (**APP-050 to APP-274**) that the road will be removed (unless otherwise stated in the relevant chapter), it is possible that engagement with the landowners at that time will establish a preference for it to be retained. Optionality has been deliberately retained in the Application to facilitate such a scenario.
- 1.4.16 There will be no permanent lighting installed and access will be controlled through gates at all stages.

- 1.4.17 Vegetation and hedgerows lost during the construction of the Bespoke Access Road will be re-instated subject to the road being removed.

In any or all of the above areas

- 1.4.18 Along with the above, in any or all of the three areas, the Proposed Development will include the following (subject to certain requirements):
- Access tracks of between 3.5m to 9m width for construction access and routine maintenance when operational. Access tracks located adjacent to drainage ditches will incorporate the necessary ecological, Environment Agency (EA) and/or Internal Drainage Board (IDB) buffers where required;
 - Boundary treatments, means of enclosure, security measures, and paths;
 - Landscaping and reinstatement planting and Biodiversity Net Gain related habitats;
 - Flood resilience measures including swales and storm water attenuation, and works to existing irrigation systems;
 - Utility diversions;
 - Bunds, embankments, protective works to buildings, maintenance and improvement of streets; and
 - Construction related (and decommissioning related) work sites.

Bicker Fen Substation Works

- 1.4.19 The extension of Bicker Fen substation will include a new generation bay, a new generation bay control room and a perimeter access road. A new generation bay will also include electrical equipment required for connection to the transmission system.
- 1.4.20 National Grid Electricity Transmission plc ('NGET') have requested that there be optionality within the design of the extension to Bicker Fen substation. The two design options that have been assessed in the **ES (APP-050 to APP-274)** and included in the Application are: Air Insulated Switchgear ('AIS') and Gas Insulated Switchgear ('GIS').
- 1.4.21 A Change Request was accepted by the Examining Authority into examination in a procedural decision dated 19 December 2025 (PD-015). This relates to a change to the proposed extension to the Bicker Fen Substation following from continued engagement between the applicant and National Grid Electricity Transmission plc. The new design of the proposed extension includes the construction of a new overhead line (OHL) tower of up to 56.2 metres (m) in height with 4 legs, each supported on a square excavation of up to 7m by 7m wide and up to 5m deep. In addition, it also includes new 400kV cabling and associated works. This henceforth forms part of the Application.

Draft Development Consent Order

- 1.4.22 The Proposed Development is described in detail in Schedule 1 to the **Draft DCO (Document Ref: 3.1)**, and the areas in which each component (the 'Work Numbers') may be constructed are shown on the Works Plans (**CRAS-0046**).
- 1.4.23 The Proposed Development is split into 10 Work Numbers as follows:
- Work No. 1 – a ground mounted solar photovoltaic generating station with a gross electrical output capacity of over 50 megawatts;

- Work No. 2 — a battery energy storage system compound and associated works (including fire safety infrastructure);
- Work No. 3 — development of an onsite substation and associated works;
- Work No. 4 — works in connection with electrical cabling and associated compounds;
- Work No. 5 — works to the existing Bicker Fen National Grid substation to create a new generation bay, overhead line tower and cabling, and substation extension;
- Work No. 6 — various ancillary works relating to the Solar Array Area, including cabling, fencing, security features, access tracks, watercourse crossings and landscaping and biodiversity mitigation measures;
- Work No. 7 — construction and decommissioning compounds in connection with Work Nos. 1, 2 and 3;
- Work No. 8 — works to create the Bespoke Access Road;
- Work No. 9 — areas of habitat management; and
- Work No. 10 — works to facilitate access to Work Nos. 1 to 9.

1.4.24 In addition, Schedule 1 to the **Draft DCO (Document Ref: 3.1)** lists other associated works (referred to as "further associated development") which may be carried out in connection with the construction of Work Nos. 1 to 10.

1.5 The Development Consent Order Process

1.5.1 As a NSIP, the Applicant is required to seek a DCO to obtain planning and other powers to construct, operate and maintain the generating station, in accordance with Section 31 of the 2008 Act. Sections 42 to 48 of the 2008 Act govern the consultation that an applicant must carry out before submitting an application for a DCO and Section 37 of the 2008 Act governs the form, content and accompanying documents that are required as part of a DCO application.

1.5.2 An application for development consent for the Proposed Development has been submitted to and accepted for examination by the Planning Inspectorate ('PINS') acting on behalf of the SoS. PINS is now examining the Application and will make a recommendation to the SoS, who will then decide whether or not to make (grant) the DCO.

1.6 Purpose of this Document

1.6.1 This document is intended to summarise clearly the agreements reached between the Applicant and the parties on matters relevant to the examination of the Application, in order to assist the Examining Authority to understand progress of negotiations between the parties. It has been prepared having regard to the guidance in *Planning Act 2008: Pre-examination stage for Nationally Significant Infrastructure Projects* and *Planning Act 2008: Examination stage for Nationally Significant Infrastructure Projects* (Ministry of Housing, Communities and Local Government and Department for Levelling Up, Housing and Communities, April 2024).

~~1.6.2 — Once finalised, the SoCG will be submitted to the Examining Authority who will decide whether to accept it into the examination of the Application.~~

~~1.6.31.6.2~~ It is intended that the SoCG will provide information for the examination process, facilitating a smooth and efficient examination and managing the amount of material that needs to be submitted. Updates to this document will be made periodically (and on request) during the examination, with a view to submitting a final signed version of the SoCG at the end of the examination.

1.7 Role of key stakeholders

1.7.1 This SoCG refers to communications and correspondence between several key stakeholders, the roles of which are summarised in Table 1.1 below.

Table 1.1 – Role of key stakeholders

STAKEHOLDER	ROLE
Beacon Fen Energy Park Limited	The Applicant
Lincolnshire County Council ('LCC')	Local Planning Authority (County)
North Kesteven District Council ('NKDC')	Local Planning Authority (District) for part of the Proposed Development, including Work Nos 1-3 and 6-8
Boston Borough Council ('BBC')	Local Planning Authority (District) for part of the Proposed Development, including Work No. 5
DWD Property and Planning ('DWD')	Planning consultants for the Applicant
SLR Consulting ('SLR')	Environmental assessment consultants for the Applicant
Pier	Communication and stakeholder engagement consultants for the Applicant
Herbert Smith Freehills Kramer LLP ('HSF Kramer')	Solicitors for the Applicant
Ardent Management Limited ('Ardent Management')	Land referencing consultants for the Applicant

1.7.2 This SoCG has been produced to confirm to the Examining Authority where agreement has been reached between the parties and, where agreement has not been reached (and that is the parties' final position) ~~and where discussions are still ongoing.~~

1.8 Status of this Version

1.8.1 This SoCG is intended to be prepared in collaboration with BBC, ~~D and as such, the Applicant has provided a draft versions of the SoCG were provided with the submissions of the application and at Deadlines 1, 4 and 6, to BBC for comment on the matters outlined in Section 3 ahead of submission into examination.~~

1.8.2 The current version is intended to be a final version of the SoCG and represents a summary of the final position of the Applicant and BBC in relation to specific matters that have been under discussions to date.

~~1.8.2 One or more further versions (revised drafts) may be agreed between the parties during the examination period and submitted to the Examining Authority to assist the examination of the Application.~~

~~1.8.3 It is intended that the Applicant and BBC can agree on a final version of the document ahead of Deadline 8.~~

~~1.8.4~~ 1.8.3 The document is structured as follows:

- Section 2 – summarises the consultation undertaken with BBC, and correspondence sent by each party prior to examination;
- Section 3 – sets out the matters agreed between BBC and the Applicant during the pre-application stage;
- Section 4 – sets out the matters agreed between BBC and the Applicant during the Examination; and
- Section 5 – sets out the matters ~~currently still subject to discussion~~ not agreed between ~~BBC and~~ the Applicant parties.

2. Summary of Consultation

2.1.1 The below Table 2.1 contains a record of pertinent correspondence between the Applicant and Boston Borough Council.

Table 2.1 – Summary of Correspondence

DATE	FORM OF CORRESPONDENCE	NOTES
10/08/2023	Meeting with BBC and DWD	Meeting to update BBC on the project changes, including removal of 'Beacon Fen South'.
04/10/2023	Draft Statement of Community Consultation ('SoCC') shared with LPAs	It was requested that feedback on the SoCC was returned by 5pm on 8 November 2023. This provided a 36-day long consultation period, eight days longer than the 28-day period required by Section 47(3) of the PA 2008.
20/10/2023	Feedback on SoCC received from BBC.	
08/11/2023	Joint meeting with BBC and NKDC	Meeting to provide Councils with a general update on the project, primarily the Bespoke Access Road.
10/01/2024	Joint meeting with LCC, NKDC and BBC with DWD, SLR and Pier.	Meeting to brief LCC, BBC and NKDC. Discussed Bespoke Access Road, mitigation masterplan and future engagement.
17/01/2024	Letter from DWD (on behalf of Applicant) to BBC	Section 42 statutory consultation with project information, including the PEIR and non-technical summary.
07/02/2024	Joint meeting with LCC, NKDC and BBC with DWD, SLR and Pier	Meeting to provide update to Councils during the statutory consultation period regarding progress and discuss biodiversity mapping.
03/04/2024	Joint meeting with LCC, NKDC and BBC with DWD and Pier	Meeting to provide update to Councils and discuss Councils' PEIR responses.
01/05/2024	Joint meeting with LCC, NKDC and BBC	Meeting to discuss Public Rights of Way and statutory consultation feedback on community benefits.

13/05/2024	Joint meeting with LCC, NKDC and BBC	Meeting to discuss community benefits.
26/06/2024	Joint meeting with LCC, NKDC and BBC	Meeting to discuss the project programme, permissive paths and community benefit.
28/08/2024	Joint meeting with LCC, NKDC and BBC	Meeting to discuss the second round of targeted consultation, permissive path, Cable Route Corridor and Bespoke Access Road red line boundary.
08/11/2024	Joint meeting with LCC, NKDC and BBC	Meeting to provide Councils with a general update and information on archaeology, and discuss the adequacy of consultation milestone, principal areas of disagreement statements/ statements of common ground (SoCGs) and local employment plan.
05/12/2024	Email from BBC	BBC response to DWD's request for comment on the Adequacy of Consultation Milestone (AoCM), advising that a formal view on AoCM would be provided at Acceptance stage.
05/12/2024	Email from BBC	Feedback from BBC regarding proposed Targeted Consultation for project updates.
13/12/2024	Letter from DWD (on behalf of Applicant) to BBC	Targeted Consultation letter regarding project updates and changes.
18/12/2024	Email from BBC	Providing comments on proposed agenda for 15 January 2025 meeting.
06/01/2025	Email from BBC	Responses from BBC on review of updated list of cumulative developments to be considered in the ES.
15/01/2025	Joint meeting with LCC, NKDC and BBC with DWD	Meeting to provide Councils with a general update and discuss Councils s42 responses. Also discussed SoCGs and community benefit fund.
17/01/2025	Targeted Consultation Response from BBC	In response to Targeted Consultation which commenced 13 December 2024.
20/08/2025	Post-Submission meeting between Applicant and BBC	BBC provided an insight into the upcoming RR to be received including the key areas of concern and the Applicant clarified points where possible.
22/09/2025	Post-Submission meeting between Applicant and BBC	The Applicant requested further information regarding the additional locations proposed by BBC for the PINS Site Inspection
30/10/2025	Meeting with BBC and the Applicant.	Meeting to discuss key agricultural land, soils and socio-economics matters following responses to Local Impact Reports.
31/10/2025	Meeting with BBC and the Applicant.	Meeting to discuss key landscape and ecology matters following responses to Local Impact Reports.
04/11/2025 to 13/11/2025	Emails between BBC and the Applicant	Following the meetings to discuss key outstanding matters, several emails have

		been exchanged to address actions from the meetings and resolve these matters.
12/12/2025 to 30/12/2025	Emails between the Applicant and BBC	Emails between the parties in relation to setting out the Applicant's proposal to address the proposed funding for & secure the Ecological Steering Group and offsite planting at the Bicker Fen substation and BBC response to the Applicants proposal
26/01/2026 to 03/02/2026	Emails between the Applicant and BBC	Emails between the parties in relation to the Outline Skills, Supply Chain and Employment Plan
26/01/2026	Meeting with BBC and the Applicant	Meeting to discuss securing Ecological Steering Group, offsite ecology and planting proposals and Skills and Employment Plan

3. BBC: Matters Agreed during Pre-Application Stage

3.1.1 The below Table 3.1 contains a list of ‘matters agreed’ between BBC and the Applicant correct at the date of the submission of the Application along with a concise commentary of what the item refers to and how it came to be agreed between the two parties.

Table 3.1 – List of Matters Agreed during Pre-Application Stage

MATTER	COMMENTARY
Adequacy of consultation	<p>BBC was consulted informally and formally by the Applicant throughout the pre-application process regarding the approach to consultation and content and scope of the Statement of Community Consultation (‘SoCC’). BBC provided comments on the draft SoCC, which were taken into account before the SoCC was published, as set out in the Consultation Report (APP-046).</p> <p>The Applicant has consulted with BBC throughout the pre-application process and undertaken statutory (and targeted statutory) consultation in accordance with the requirements as set out in Sections 42, 47 and 48 of the 2008 Act.</p>
Procedure for discharge of DCO requirements	<p>The Applicant has provided a draft of the procedure for the discharge of DCO requirements to BBC at Appendix 1. The Applicant will consider any comments provided by BBC and reflect as necessary in the procedure set out in Part 2 of Schedule 2 of the Draft DCO (Document Ref: 3.1).</p>
Need for a solar and battery project in general and of this scale	<p>National Policy Statements (‘NPSs’) and other UK national policy recognise that solar plays a key role in achieving the Government’s carbon reduction targets. NPS EN-1 sets out the urgent need for new electricity generation capacity and the importance of decarbonising the power and industrial sectors in the UK to meet climate targets, and the NPSs require the Secretary of State to give significant weight to this needs case for renewable energy projects when considering an application.</p> <p>As per the Clean Power 2030 Action Plan, the Government expects at least a further 21.2GW in deployment of new solar projects within just 6 years to reach their target of 45-47 GW, by 2030. To support this growth, an extra 23-27 GW of battery storage is needed by 2030 to provide flexible capacity.</p>
Principles regarding proposed access for substation works and the cable route.	<p>During construction, temporary construction compounds will be required every 1-3 km approximately, as well as temporary roadways, to enable access to all land. It is anticipated that there will be six main compounds that are distributed at approximately equal distances along the cable route to facilitate proper construction management. Smaller temporary compounds may also be located anywhere within the final working area. The extension of Bicker Fen substation will include a perimeter access road amid the new generation bay and control room.</p>

	The Applicant will submit with the application Works Plans (CRAS-0046) and Outline Design Principles within the Design and Access Approach Document (AS-019REP6-015).
Planning history	The Applicant has provided a list of past planning decisions for the land within the proposed Order Limits (see Appendix 1) based on the online public register along with information held by the Applicant relating to historical consents at the Proposed Development Site.
List of requirement discharge documents – agreement to principle	<p>The Applicant has provided a list of documents to be submitted at requirement discharge stage (see Appendix 2) that are proposed to mitigate likely effects or provide enhancement or policy benefits. The Draft DCO (Document Ref: 3.1) sets out the proposed timings and contents of these documents.</p> <p>The Applicant will submit outline versions of the Landscape and Ecological Management Plan (APP-089), Construction Environmental Management Plan (APP-077), Construction Traffic Management Plan (APP-159), Soil Management Plan (APP-176), Skills, Supply Chain and Employment Plan (APP-179) and Decommissioning Environmental Management Plan (APP-078), with the Application, on which BBC will provide comments during examination. The Applicant will also submit the Biodiversity Net Gain Strategy (APP-280).</p>
National planning policy	<p>It is agreed that the following National Policy Statements ('NPSs') are relevant to the Application and provide the primary basis for decisions by the SoS in relation to the Application:</p> <ul style="list-style-type: none"> • The Overarching NPS for Energy (EN-1); • The NPS for Renewable Energy Infrastructure (EN-3);and • The NPS for Electricity Networks Infrastructure (EN-5). <p>It is agreed that the National Planning Policy Framework (December 2024) may also be relevant to the consideration of the Application.</p>
Local development plan policy	<p>It is agreed that section 104 of the PA 2008 states that the SoS must have regard to other matters that are 'important and relevant', and it is agreed that that includes the development plan in force in the area. It is also agreed that EN-1 is clear that in the event of any conflict between a NPS and a local development plan document, the NPS prevails for the purpose of SoS decision-making given the national significance of the infrastructure concerned.</p> <p>It is agreed that the South East Lincolnshire Local Plan 2011-2036 ('SELLP') is the development plan in force within the administrative area of BBC. It is further agreed that the following policies from the SELLP are most relevant to the Proposed Development.</p> <ul style="list-style-type: none"> • 1 - Spatial Strategy (Part D) • 2 - Development Management • 3 - Design of New Development • 4 - Approach to Flood Risk • 28 - The Natural Environment • 29 - The Historic Environment • 30 - Pollution • 31 - Climate Change and Renewable and Low Carbon Energy • 32 - Community, Health and Wellbeing

4. BBC: Matters Agreed during Examination Stage

4.1.1 The below Table 4.1 contains a list of ‘matters agreed’ between BBC and the Applicant ~~correct at the date of the submission of the Application~~ during Examination stage, along with a concise commentary of what the item refers to and how it came to be agreed between the two parties.

Table 4.1 – List of Matters Agreed during Examination Stage

MATTER	COMMENTARY
Construction noise consent	As outlined in the Other Consents and Licences Statement (REP1-005) , the Applicant agrees that if required, construction noise consent under Section 61 of the Control of Pollution Act 1974 will be applied for prior to the start of construction, or prior to specific construction activities.
Article 44 Lopping and Felling of Trees	BBC’s welcomes the changes to Article 44 (which was article 43) with the addition of paragraph (11) within the Draft DCO (Document Ref: 3.1) and the explanation provided within the Explanatory Memorandum at paragraph 8.1.18 that ‘the power in Article 44 can and must only be exercised in accordance with the requirements set out in Schedule 2 to the Draft DCO (Document Ref: 3.1) , specifically requirements 7, 8 and 12.’ The Change to article 44 and the explanation within the Explanatory Memorandum clarifies BBC concern here.
Vegetation removal at the extension to Bicker Fen Substation.	<p>Following BBC’s request for further clarification on Vegetation Removal Plans for the extension to Bicker Fen Substation, these were <u>Vegetation Removal Plan (REP2-025 to 027)</u> was updated and submitted at Deadline 2 (<u>REP2-025 to 027</u>).</p> <p>Following further discussions with BBC, this document was updated and submitted at deadline 5 <u>with the change request</u> to better distinguish vegetation in the highway verge (<u>CR-022 to 024</u>).</p> <p>The extent of vegetation removal associated with the Bicker Fen Extension is shown in the Vegetation Removal Plan (CR022 REP2-025 to 0247). This plan is based on 6.3.18 Appendix 6.6 Arboricultural Impact Assessment (APP-088) which includes the identification of relevant vegetation within the Order Limits. To provide further clarity, as set out in para. 2.4.5 of the oLEMP (Document Ref: 6.3.19 APP-089), the extent of vegetation indicated represents a worst-case scenario to provide flexibility. The precise extent and locations of vegetation removal will be confirmed during detailed design and, as stated in the oLEMP (Document Ref: 6.3.19).</p> <p><u>BBC welcomes the strengthening of commitment to the detailed LEMP including Vegetation Removal Plans that must, all vegetation removal will be in accordance with the Vegetation Removal Plan (CR022 to 024 REP2-025 to 027). BBC preference would have been for this commitment to also have</u></p>

	<p><u>been included within the wording of Requirement 7 however as BBC are included as the relevant authority for the discharge of this Requirement it accepts that via the discharge of Requirement process it will be able to ensure the required information is in accordance with the submissions.</u></p> <p>A Plantation Removal Plan (APP-037) has also been provided which shows the proposed extent of removal in relation to vegetation/habitat types in plan form and also superimposed on aerial photography.</p>
<p>Vegetation removal at South Forty Foot Drain LWS</p>	<p>BBC previously raised concerns that the Vegetation Removal Plan 6.4.43c (APP-237) appeared to show the removal of all vegetation within the LWS South Forty Foot Drain when a trenchless crossing (such as HDD) is proposed.</p> <p>BBC requested further clarification on Vegetation Removal Plans for South Forty Foot Drain as it was difficult to distinguish between removal and retention with the potential for all vegetation to be removed.</p> <p>Figure 6.32 Vegetation Removal Plan (APP-236 to APP-238) has been updated and was submitted alongside the Applicant Responses to Relevant Representations (Document Ref: 9.2) at Deadline 1 to clarify the potential loss of vegetation on the South Forty Foot Drain.</p> <p>As set out in the oCEMP (APP-077), trenchless methods such as auger boring, Horizontal Directional Drilling (HDD) or micro-tunnelling will be deployed to cross Hodge Dike, Heckington Eau and South Forty Foot Drain. Therefore, there will be no requirement to remove existing vegetation on the South Forty Foot Drain.</p> <p>To provide further clarity, as set out in para. 2.4.5 of the oLEMP (Document Ref: 6.3.19APP-089) the extent of vegetation indicated represents a worst-case scenario to provide flexibility. The precise extent and locations of vegetation removal will be confirmed during detailed design. Within the Cable Route Corridor the maximum width of vegetation removal will be 30m each place where the Cable Route crosses vegetation as set out in para. 2.4.6 of the oLEMP (Document Ref: 6.3.19APP-089). This width also allows for the implementation of any associated infrastructure such as the haul road.</p>
<p>Temporary loss of BMV land: Soil Surveys</p>	<p>ES Chapter 14: Soils and Agricultural Land (APP-065) confirms that the detailed soil survey of the Cable Route Corridor of the Bicker Fen Substation extension site would be carried out pre-construction.</p> <p>BBC questioned how the use of Best and Most Versatile ('BMV') Agricultural Land has been minimised in relation to this area</p>

	<p>without detailed soil surveys to inform avoidance and minimisation.</p> <p>The Applicant sought to minimise impacts on BMV land through the selection and design of the Site. The results of the pre-construction Cable Route Corridor ALC survey will identify the grading of BMV land within the Corridor and allow the final siting of the Cable Route to avoid higher grade land where practicable. The Applicant also noted that the location of the Bicker Fen substation extension has been determined by NGET in accordance with their requirements and constraints for construction and therefore siting is not determined by the same factors as for the remainder of the Cable Route Corridor, such as through the use of ALC survey data. Of the 3 ha of land required for the extension, 2.4 ha has already been consented through the Heckington Fen DCO and none is currently in agricultural use.</p> <p>The Applicant and BBC held a meeting on 30 October 2025 to discuss this matter. Following the meeting, BBC reviewed precedent of DCO decisions and confirmed its agreement to the Applicant's position in carrying out the surveys pre-construction.</p>
<p>Reinstatement of ALC Grade</p>	<p>Following discussions regarding a request by BBC to include a commitment within the oSMP (Document Ref: 6.3.95) to reinstate BMV land to the same ALC Grade as it was prior to commencement, the Applicant updated Section 7.6 of the oSMP (Document Ref: 6.3.95) at Deadline 5 to include a specification the soils will be reinstated to its previous quality. <u>BBC welcomes the Applicant's amendments that strengthen the Applicants commitment for the reinstatement of Agricultural Land to the baseline soil profile determined by a pre-construction soil survey. BBC have confirmed their agreement to this approach.</u></p> <p><u>BBC preference would have been for this commitment to also have been included within the wording of Requirement 16 of the Draft DCO (Document Ref: 3.1) however as BBC are now included as the relevant authority for the discharge of this Requirement it accepts that via the discharge of Requirement process it will be able to ensure the Agricultural Land is reinstated to its baseline soil profile as determined by a pre-construction survey.</u></p>
<p>Temporary loss of BMV:- Cable Route Selection and Mitigation for the loss of BMV</p>	<p>The Cable Route Corridor Appraisal (Document Ref: 6.3) details the process the Applicant undertook to identify, review and avoid the environmental constraints associated with the Cable Route Corridor.</p> <p>The Cable Route Corridor was designed wider than the working width for the cable trenches to allow for routing to factor in the various planning, environmental and technical constraints. Final routing of the Cable Route will be informed by the results of the pre-construction Cable Route Corridor ALC survey, to avoid higher grade land where practicable.</p>

	<p>With regards to the Bicker Fen substation extension works, the precise location and extent of the works (and subsequent effects for the loss of BMV) is subject to NGET’s detailed design process. As such, the ES has assessed the likely worst-case effects of the Proposed Development.</p> <p>While BBC has confirmed its agreement to the above in terms of minimising the Proposed Development’s impact on BMV land, it maintains its position that there is a local impact in relation to the principle of the loss of BMV land as outlined in Section 5 below.</p>
<p><u>Mitigation for the loss of BMV</u></p>	<p><u>BBC agrees that the Applicant has sought to minimise impacts on BMV land through the selection and design of the Site, as evidenced through Appendix 2: Site Selection Report of the Planning Statement Document (REP5-010) and the Design and Access Approach Document (REP6-015), and through the measures within the oSMP (Document Ref: 6.3.95).</u></p>
<p>Procedure for discharge of DCO requirements</p>	<p>The Applicant amended the fee structure and fee amounts in paragraph 24 in Schedule 2 to the Draft DCO (Document Ref: 3.1) to include higher costs and reflect the equivalent drafting in the latest version of the Springwell draft DCO.</p> <p>BBC requested that paragraph 24 (2)(a) in Schedule 2 to the Draft DCO (Document Ref: 3.1) be further updated to include Requirements 8 and 17 in addition to those already listed.</p> <p>The Applicant agreed to this request and updated the Draft DCO (Document Ref: 3.1) accordingly in its Deadline 4 submission.</p>
<p><u>Vegetation Removal and Mitigation of Landscape and Visual Effects at Bicker Fen Substation</u></p>	<p>ES Chapter 6 Landscape and Visual (APP-057) reports significant visual effects as a result of close to middle distance views of construction activity associated with the Bicker Fen Substation extension. On completion of the construction phase, the presence of the Bicker Fen Substation will be visible but perceived in relation to the context of the existing substation and associated large scale energy infrastructure in views. The extent of vegetation indicated represents a worst-case scenario to provide flexibility.</p> <p>Mitigation for both landscape and visual effects will include the implementation of measures in Appendix 2.4: Outline Construction Environment Management Plan (‘oCEMP’) (APP-077) and the oLEMP (Document Ref: 6.3.19). A line of mature vegetation within the highway verge will be retained along the southern boundary of the Bicker Fen Substation extension to provide partial screening/filtering of receptor views.</p> <p>BBC’s Written Representation (REP1-060) and Local Impact Report (REP1-059) raised concerns regarding the landscape</p>

	<p>and visual effects of the extension to Bicker Fen Substation. In order to address BBC’s concerns, the Applicant:</p> <ul style="list-style-type: none"> • updated Figure 6.32 Vegetation Removal Plan (APP-236 to APP-238) at Deadline 1 to clarify the potential loss of vegetation on the South Forty Foot Drain; a • provided further information in its Comments on Local Impact Reports (REP2-04), Written Summary of Oral Submissions from Issue Specific Hearing 2 (ISH2) and Responses to Action Points 1 (REP4-026) and Applicants Responses to Remaining Action Points (REP5-046); and • updated ES Chapter 6: Landscape and Visual (Document Ref: 6.2.6) and the oLEMP (Document Ref: 6.3.19) at Deadline 5. <p>BBC reviewed the revision to the oLEMP (Document Ref: 6.3.19) at Deadline 5 and confirmed their agreement that these revisions strengthen commitments regarding vegetation removal and retention.</p>
<p>Mitigation on of Visual Effects to sensitive receptors Residential Properties</p>	<p>Mitigation for and visual effects will include the implementation of measures in Appendix 2.4: oCEMP (APP-077) and oLEMP (Document Ref: 6.3.19). These measures will include the replacement of hedgerows lost during the construction phase. Detailed versions of these documents are secured by requirement in the Draft DCO (Document Ref: 3.1).</p> <p>BBC considers there is a residual local impact and agrees that the mitigation proposed addresses that impact to the extent possible within the operational and land constraints present.</p>
<p><u>Principle of funding for off-site biodiversity enhancements</u></p>	<p>The Applicant has offered agreed to <u>provide funding of £15,000 for the fund</u>-provision by BBC of off-site hedgerow planting, gapping up of existing hedgerows or another improvement to connectivity for biodiversity between natural habitats in the Borough of Boston and outside of the Order Limits. BBC <u>welcome this commitment and</u> -has confirmed their agreement in-principle to the funding for these enhancements. <u>The Applicant has updated the Draft DCO (Document Ref: 3.1) at Deadline 7 to include a new article securing the allocation of this ecology contribution. BBC has reviewed and agrees to the inclusion of the new article as well as the updates to the oLEMP (Document Ref: 6.3.19).</u> but wish to further discuss the practicalities and parameters of this funding and how it will be secured, as set out in Section 7 below.</p>
<p><u>Ecological Steering Group</u></p>	<p><u>In addition to the funding for onsite enhancements, the Applicant is proposing to secure the establishment of an Ecological Steering Group (‘ESG’), including funding for the ESG of £13,500 per Local Planning Authority. BBC welcomes the Applicant’s amendments to the oLEMP (Document Ref: 6.3.19) at Deadline 5 to include this commitment. Following discussions with BBC, NKDC and LCC, the Applicant has updated the Terms of Reference within oLEMP (Document Ref: 6.3.19) submitted at Deadline 7, and included a new article within the Draft DCO (Document Ref: 3.1) securing the allocation of funding</u></p>

	<p><u>contributions to BBC for the ESG. The detailed LEMP(s) which will be submitted to BBC for approval must provide further details of how such funding will be provided to BBC.</u></p>
<p><u>Biodiversity Net Gain</u></p>	<p><u>BBC welcomes the Applicants commitment to BNG, in the Biodiversity Net Gain Strategy (REP2-029) particularly as BNG is not yet a mandatory requirement for NSIPs. BBC noted that BNG does not benefits the Borough as all of the measures are outside of its administrative area. The Applicant recognises that the BNG uplift/new woodland habitats outlined in the Biodiversity Net Gain Strategy (REP2-029) is proposed for delivery on the Solar Array Area due to the operational constraints upon on site delivery at Bicker Fen Substation and the appropriate flexibility required to allow for different substation extension designs. BBC agrees that the Applicant has provided BNG as far as practicable taking into account the land and ownership constraints.</u></p>
<p><u>Impact of Construction Activities</u></p>	<p>BBC raised concern about the significant disruption that will be caused to the community during the construction phase taking account of construction timelines, as well as the potential for cumulative impact of construction activities from a number of NSIP Projects within the area. <u>Further to the mitigation measures embedded in the design of the project, the Applicant notes that each technical chapter of the ES Chapters 6 to 16 (APP-057 to APP-067) has considered the need for additional mitigation measures where necessary. Table 19.1 of ES Chapter 19: Summary of Significant Environmental Effects summarises the additional mitigation proposed and confirms how this is secured within the Draft DCO (Document Ref: 3.1).</u></p> <p>BBC accept and agree that the <u>cumulative impact assessment undertaken by the Applicant is adequate, the impact of construction is mitigated as far as is practicable, and that all has been done that is possible to ensure that adequate construction impact management and mitigation is in place and secured within the Requirements of the draft DCO (Document Ref:3.1).</u> However as set out in Section 5 below, it maintains its position that there is the potential for <u>local-cumulative</u> impact in relation to the disruption to the community during construction activities.</p>
<p><u>Ecology Steering Group</u></p>	<p>BBC welcomes the commitment to provide an ecology and planting contribution up to a maximum of £15,000.00 for hedgerow planting, gapping up of existing hedgerows, or another improvement to the connectivity for biodiversity between natural habitats in the Borough of Boston and outside of the Order Limits.</p> <p>How the fund would be managed and delivered is yet to be agreed.</p>
<p><u>Reinstatement of ALC Grade Mitigation for the temporary loss of BMV</u></p>	<p><u>BBC welcomes the Applicant's amendments to the Outline Soil Management Plan (Document Ref: 6.3.95) that strengthen the Applicants commitment for the reinstatement of Agricultural Land to the baseline soil profile determined by a pre-construction soil survey.</u></p>

	<p><u>BBC preference would have been for this commitment to also have been included within the wording of Requirement 16 however as BBC are now included as the relevant authority for the discharge of this Requirement it accepts that via the discharge of Requirement process it will be able to ensure the Agricultural Land is reinstated to its baseline soil profile as determined by a pre-construction survey.</u></p>
<p><u>Bicker Fen Substation Landscape Enhancement</u></p>	<p><u>BBC welcomes the Applicants amendments to the oLEMP) (Document Ref: 6.3.19). BBC preference is that the funding element of the Ecological Steering Group and that of the offsite environmental enhancement measures within the Borough is secured via a S106 Agreement rather than Requirement 7.</u></p> <p><u>BBC welcomes the strengthening of commitment to the detailed LEMP including Vegetation Removal Plans that must be in accordance with the submitted Vegetation Removal Plans (CR-022 to 024), the planting detail and the proposed times of such planting and implementation timetable' and replacement planting that, is removed, dies or becomes seriously damaged or diseased in the first available planting seasons with a specimen of the same species and size as that originally planted.</u></p> <p><u>BBC preference would have been for this commitment to also have been included within the wording of Requirement 7 however as BBC are included as the relevant authority for the discharge of this Requirement it accepts that via the discharge of Requirement process it will be able to ensure the required information is in accordance with the submissions.</u></p>
<p><u>The content of requirements</u></p>	<p><u>BBC and the Applicant have continued to engage and have now reached agreement in relation to the specific drafting of the requirements in Schedule 2 of the Draft DCO (Document Ref: 3.1), including the use of 'substantially in accordance with' in Part 1 of Schedule 2 of the Draft DCO (Document Ref. 3.1)</u></p>

5. BBC: Matters not yet agreed

5.1.1 The below Table 5.1 contains a list of ‘matters not yet agreed’ correct at the date of the submission of the Application along with a concise commentary of what the item refers to and how it came to be agreed between the two parties.

Table 5.1 – List of Matters not yet agreed during Pre-Examination Stage

MATTER	BBC POSITION	APPLICANT POSITION
<p><u>The content of requirements Phasing Plan Requirement</u></p>	<p>BCC-BBC thanks the Applicant for their explanation of the use of ‘substantially in accordance with’ in Schedule 2 part 1 of the draft DCO (Document Ref. 3.1)</p> <p>The specific drafting of the requirements in Schedule 2 of the Draft DCO (Document Ref: 3.1) is not yet agreed. BBC will continue dialogue with the Applicant to agree the Content of the Requirements as set out at Schedule 2 Part 1 of the draft DCO (Document Ref. 3.1).</p> <p>In particular, BBC suggests considers that that an additional Requirement should be included in Schedule 2 of the Draft DCO (Document Ref: 3.1) is inserted to requireing the submission of a Phasing Plan so that there is clarity in the Discharge of Requirements as to what phase is being discharged at any particular time <u>and the construction timelines (as the extension works to Bicker Fen Substation are proposed to take 60 weeks and elsewhere generally 2.5 to 5 years).</u></p>	<p>The Applicant will continue to engage constructively and regularly with BBC officers and seek to reach agreement on the matters within Schedule 2 during examination.</p> <p>The Applicant disagrees that there is a need for an additional requirement relating to approval of a phasing plan. <u>The Applicant notes that Any</u> documents submitted to discharge a requirement will make clear which "part" or "phase" of the authorised development they relate to.</p> <p>The Applicant also notes that Section 2.14 of ES Chapter 2: Proposed Development (APP-053) describes the Applicant's proposed approach to the programme for the construction of the authorised development but this will depend on progress with third party licences, agreements, requirement discharge and procurement of materials. This shows in outline the intended construction phasing to be adopted. The Applicant does not consider that a plan describing the phasing of the discharge of Requirements needs to be secured in a new Requirement.</p>
<p>Principle of the loss of BMV</p>	<p>Noting BBC’s agreement as set out in Table 4.1</p>	<p>The Applicant has sought to minimise impacts on BMV land through the</p>

	<p>above that the Applicant has mitigated the loss of BMV as far as practicable, BBC considers that there is an in-principle concerns regarding the loss of BMV land.</p>	<p>selection and design of the Site, as evidenced through Appendix 2: Site Selection Report of the Planning Statement Document (APP-277REP5-010) and the Design and Access Approach Document (AS-019REP6-015), and through the measures within the oSMP (Document Ref: 6.3.95).</p> <p>Following cable instalment, access tracks would be removed and the land returned to agricultural use. The vast majority of the land affected by the substation extension (3ha) is not managed for arable agriculture, instead comprising areas of woodland, scrub, electricity infrastructure, hardstanding, and being under the control of NGET in the vicinity of an existing high voltage substation. While provisionally mapped as grade 2 land, if this were subject to an ALC survey the majority of this land would in all likelihood be deemed non agricultural. This is described further in the Change Request ES Addendum (CR-029) at paragraph 8.3.4.</p>
<p>Reinstatement of ALC Grade Mitigation for the temporary loss of BMV</p>	<p>Noting BBC's agreement as set out in Table 4.1 above regarding the updates to Section 7.6 of the oSMP (Document Ref: 6.3.95) to include a specification the soils will be reinstated to match the baseline soil profile characteristics, BBC's preference is for this commitment to be included in Requirement 16 of the Draft DCO (Document Ref: 3.1).</p>	<p>The Applicant notes BBC's proposed wording for Requirement 16 in its email on 18 November 2025. The Applicant has updated the oSMP (Document Ref: 6.3.95) at Deadline 5 to clarify this matter and strengthen its commitments to address the concerns raised by BBC. Noting BBC's comments, the Applicant is currently considering updates to Requirement 16 of the Draft DCO (Document Ref: 3.1) and the oSMP (Document Ref: 6.3.95) and will provide an update at a future deadline.</p>
<p>Bicker Fen substation landscape enhancement</p>	<p>Noting BBC's agreement in Table 4.1 above in relation to the commitments in the oLEMP (Document Ref: 6.3.19) regarding vegetation removal and retention, BBC considers that the oLEMP (Document Ref: 6.3.19)</p>	<p>The Applicant has updated the oLEMP (Document Ref: 6.3.19) to include reference to the requirement for a vegetation reinstatement method statement:</p> <p>It is assumed that Work areas 5C and 5D will be temporarily laid to aggregate/matting to facilitate</p>

