

# Heckington Fen Solar Park

EN010123

## Environmental Statement | Volume 3: Technical Appendices Appendix 6.10: Summary of Section 42 Consultation Responses Since PIER

Applicant: Ecotricity (Heck Fen Solar) Limited

Document Reference: 6.3.6.10

Pursuant to: APFP Regulation 5(2)(a)

February 2023



**APPENDIX 6.10- SUMMARY OF SECTION 42  
CONSULTATION RESPONSES SINCE PEIR**

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<b>Regulation Reference</b>	Regulation 5(2)(a)	
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<b>Title</b>	Appendix 6.10 - Summary of Section 42 Consultation Responses since PEIR	
<b>Prepared By</b>	Heckington Fen Energy Park Project Team (Pegasus)	
<b>Version History</b>		
<b>Version</b>	<b>Date</b>	<b>Version Status</b>
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Consultee	Details of Consultee response	How is matter addressed	Location of response
Lincolnshire County Council	Details on the final location and appearance/extent of taller/larger elements that form part of the development.	The design of the Proposed Development has been finalised.	<b>Figure 6.2 Landscape Strategy Plan</b> (document reference 6.2.6).  Paragraph 6.2.8
	Refinements to the grid connection corridor from the site to the Bicker Fen National Grid Substation.  Insufficient overview of the extension to the Bicker Fen National Grid Substation.	The design of the Proposed Development has been finalised.	The Off-site Cable Route Corridor has been refined and is shown on <b>Figure 1.1 Order Limits</b> and <b>Figure 3.5 Indicative Cable Route</b> .  The nature and extent of the National Grid Bicker Fen Substation Extension Works are clarified in <b>Chapter 4</b> and this <b>Chapter 6</b> (document reference 6.1.6).
	Flexibility within the DCO and plans. Expect the locations of these elements be indicated within the ES to allow for the LVIA to accurately assess and viewpoints and/or visualisations to illustrate.  Paragraphs 4.5.1 to 4.5.39 provide detailed information on the components of the development and Tables 4.2 and 4.3 of the PEIR usefully provide details of the design parameters used for the PEIR.	The design of the Proposed Development has been finalised.	The Off-site Cable Route Corridor has been refined and is shown on <b>Figure 1.1 Order Limits</b> and <b>Figure 3.5 Indicative Cable Route</b> .  Paragraph 6.2.8

	<p>Concerns with regards to the larger and taller elements, such as the bunding (up to 6m), substation and Control Building Parameters as outlined in Table 4.3. The final location and layout of these elements will have likely greater visual effects in this flat, open rural landscape than PV panels.</p> <p>Updated ZTV expected, based upon these parameters and an understanding of the likely requirement for additional viewpoint photographs to capture views of the taller/larger elements which will be much more visible and conspicuous.</p> <p>Paragraphs 4.5.40 to 4.5.42 provide information on offsite cabling, the route of which is still being developed, and confirms that no above ground cabling is proposed off site. However we have concerns in regards to the visual and landscape impacts, as well as potential ecological impacts, where cables cross obstacles, such as watercourses or the train line, which we assume would be carried out by directional drilling to minimise effects, particularly at construction. This should be clearly stated and assessed as part of the assessment and existing landscape and ecological assets in these locations should be protected and surveyed if appropriate to ensure effects are minimised.</p>		<p><b>Figure 6.5a Screened Zone of Theoretical Visibility - Solar Areas and Proposed Viewpoint Locations Plan</b>(document reference 6.2.6).</p> <p><b>Figure 6.5b Screened Zone of Theoretical Visibility - Substation Equipment with EES and Proposed Viewpoint Locations Plan</b> (document reference 6.2.6).</p> <p><b>Figure 6.5c Screened Zone of Theoretical Visibility - National Grid Bicker Fen Substation Extension Works and Proposed Viewpoint Locations Plan</b> (document reference 6.2.6).</p>
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	<p>Paragraphs 4.5.43 to 4.5.45 provide information on the Bicker Fen Substation works. The ES should clearly state the proposed works in this location as they have likely landscape and visual effects, particularly if impacting existing trees, as referenced within paragraph 4.5.45. At this stage, limited viewpoints have been proposed in this location, and once works are understood, we would suggest consultation is carried out with AAH/LCC and the district councils to ascertain any additional viewpoint requirements to assess visual effects.</p> <p>Mitigation proposals are provided in Table 4.3, which identifies Biodiversity Net Gain Area and Community Orchard. While these areas are shown on illustrative layouts, having these included in the design parameters allows for them to be accurately captured as part of the scheme, and parameters plan clearly illustrating these areas would be recommended. Figures 4.1C , 4.1 D and 4.1E appear to be good examples of plans to submit as potential parameter plans to accompany the design parameters tables. This would allow for transparency and clarity of development areas, areas of taller/larger development and mitigation when reviewing the LVIA and allow for an understanding of how the development has been assessed.</p>	<p>The design of the Proposed Development has been finalised. Further discussion with LCC took place; additional viewpoints scoped out.</p>	<p>The effects of the Off-site Cable Route Corridor and National Grid Bicker Fen Substation Extension Works are described in this <b>Chapter 6</b> (document reference 6.1.6).</p> <p>Comments with regard the orchard and parameters plan are noted, refer to <b>Figure 2.1</b> Indicative Site Layout.</p>
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	<p>If the plans and sections for the LVIA are still intended to be indicative, the LVIA needs to clearly state what layout, offsets and mitigation the assessment has been based upon, as different mitigation strategies will likely alter potential effects. Also, we would expect the layout to not just deliver green infrastructure to the minimum offsets provided on Figure 4.1 C and seek opportunities for positive contributions to the landscape of the site. We would recommend an Outline Landscape and/or Ecological Management Plan, or similar, be developed to provide a clear strategy to secure any mitigation and enhancement areas.</p>	<p>The design of the Proposed Development has been finalised.</p>	<p><b>Figure 6.2 Landscape Strategy Plan</b> (document reference 6.2.6). Mitigation and Enhancement Section of this <b>Chapter 6</b> (document reference 6.1.6).  <b>Appendix 6.9</b> refers to the proposed mitigation measures (document reference 6.3.6.9).</p>
	<p>Summary of main overarching comments on the PEIR</p> <p>1. Overall the scope of the LVIA is generally aligned with the scoping report and scoping opinion, as well as other AAH comments (AAH TM01 and AAH TM02) and meetings held with Pegasus.</p> <p>However, Paragraph 6.3.15 of the PEIR states that "Representative and illustrative viewpoints have been agreed with Lincolnshire County Council and North Kesteven District Council through the Scoping Report submitted to the Planning Inspectorate". This is not correct, and as part of the scoping report it was requested that further consultation be carried out with the relevant councils in regards to the viewpoint locations and visualisations. Subsequently, AAH/LCC issued AAH TM02, that provided general comments on</p>	<p>The viewpoint selection was finalised and agreed with LLC's landscape advisor during an on-line meeting held in September 2022.</p> <p>The design of the Proposed Development has been finalised.</p>	<p><b>Figure 6.2 Landscape Strategy Plan</b> (document reference 6.2.6).  <b>Chapter 4</b> provides detailed information with regard to the Proposed Development.  <b>Appendix 6.8</b> (document reference 6.3.6.8) and <b>Appendix 6.9</b> (document reference 6.3.6.9) provide viewpoint assessment.</p>

	<p>the landscape and visual aspects of the scheme as well as comments on proposed viewpoints, which included recommendations for additional views. These have not been incorporated into the PEIR, or shown on Figures 6.3a, 6.3b, and 6.3c at this stage. Therefore we request that consultation is carried out between Pegasus and AAH/LCC and other relevant consultees, in regards to agreeing the viewpoints and visualisations based on comments made within AAH TM02.</p> <p>2. As outlined within Chapters 3 and 4 of the PEIR, the development proposals are still being developed and finalised. This includes the type of panel and location and design of taller/larger elements such as substations and battery storage. While it is understood that some aspects of the scheme are unlikely to be detailed until the tendering has been completed, we would expect a reasonable level of design fix for the final ES which would clearly set out the parameters of the development, such as heights and locations of elements that have been used in the assessment, which if there are still some outstanding design and layout elements to be finalised would be based on a “worst case” scenario to ensure any effects are not underplayed. This is particularly important for larger and taller elements such as sub stations or battery storage.</p>		<p>Mitigation and Enhancement Section of this <b>Chapter 6</b> (document reference 6.1.6).</p>
	<p>As mentioned within paragraph 6.3.15 of the PEIR, it is requested that further landscape and visual</p>	<p>Further consultation has been carried out;</p>	<p><b>Figure 6.5a Screened Zone of Theoretical Visibility - Solar</b></p>

	<p>consultation is carried out between AAH/LCC and District Authority landscape specialists and the developer team (Pegasus) following the conclusion of this second formal consultation phase. This would likely cover the PEIR comments, AAH TM02, as well as development proposals and the mitigation scheme, and location of any larger structures or buildings such as the substations and development at Bicker Fen Substation, extent of vegetation loss for highways works, and also subsequent knock-on effects such as any requirement for additional viewpoints or AVRs.</p>	<p>viewpoint selection was discussed and agreed with LLC’s landscape advisor during an on-line meeting held in September 2022.</p>	<p><b>Areas and Proposed Viewpoint Locations Plan</b> (document reference 6.2.6).</p> <p><b>Figure 6.5b Screened Zone of Theoretical Visibility - Substation Equipment with EES and Proposed Viewpoint Locations Plan</b> (document reference 6.2.6).</p> <p><b>Figure 6.5c Screened Zone of Theoretical Visibility - National Grid Bicker Fen Substation Extension Works and Proposed Viewpoint Locations Plan</b> (document reference 6.2.6).</p> <p><b>Appendix 6.8</b> (document reference 6.3.6.8) and <b>Appendix 6.9</b> (document reference 6.3.6.9) provide viewpoint assessment.</p>
	<p>Paragraph 6.2.5 - the elements within the Proposed Development should all reference design parameters, clearly stating extent (location and area) and size (including maximum height) of each element that makes up the development.</p>	<p>The design of the Proposed Development has been finalised.</p>	<p>Details of the Proposed Development are included in this <b>Chapter 6</b> (document reference 6.1.6), Paragraph 6.2.8</p>



	<p>Paragraph 6.3.9 - the PEIR identifies the extent of the Study Area of the development of up to 3km which defines the spatial scope of the area to be addressed. The ZTV (Figures 6.3) shows a study area of 5km and along with PEIR (paragraph 6.3.6 and 6.3.7) does identify potential visibility beyond 3km, and from AAH site visits potential visibility of the site and development were identified beyond 3km. The LVIA Chapter should therefore include a clear statement, similar to that provided within paragraphs 6.3.6 to 6.3.9, on the study area (3km or 5km), justification for the extent of the Study Area and figures should also clearly illustrate this extent.</p> <p>Paragraph 6.3.10 provides an overview of the proposed development at Bicker Fen Substation, and we would expect the LVIA to fully assess these landscape and visual effects and include viewpoints and visualisations as appropriate.</p> <p>Paragraph 6.3.12 states that landscape effects would be limited to the area occupied by the Proposed Development. This may not always be the case, and would anticipate there may be potential effects in the area immediately surrounding the site where the landscape character may indirectly change, for example, currently being an open rural landscape, to one that contains development and artificial landform</p>		<p>This <b>Chapter 6</b> (document reference 6.1.6) provides further justification with regard to the study area and its extent.</p> <p>The design of the Proposed Development has evolved and the extension to the Bicker Fen Substation now forms a relatively modest element. This is further explained in this <b>Chapter 6</b> (document reference 6.1.6).</p> <p>Landscape character and visual effects are assessed in detail.</p>
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	<p>(bunds) that screen views and effect the perception of openness and “big skies”.</p> <p>Paragraphs 6.3.33 to 6.3.39 - it is assumed the PEIR is stating that only effects of a Major level would be considered as Significant. Therefore, moderate or moderate to major landscape and visual effects may not be considered significant. We disagree with this, which is a variation from typical assessments that may class effects moderate (and above) as significant: no justification in the methodology is provided for this and could lead the assessment as being deemed as underplaying the identification of significant effects.</p> <p>Paragraph 6.3.72, bullet 7, states: “The assessed Proposed Development is based on application drawings that accompany this PEIR and is assessed on the assumption that the Proposed Development is delivered in line with these drawings and associated timescales.”. This statement causes some confusion as layouts are currently labelled indicative, which we assume is commensurate with the preliminary nature of the PEIR. The submission and LVIA should clearly detail the scheme that the submission will be based upon: indicative layouts or parameter plans.</p> <p>Paragraph 6.4.5 - identifies PROW Heck/15/1 running along the northern boundary of the site, and also its termination at Head Dyke. This correlates with the online LCC PROW mapping, and while does not connect</p>	<p>The design of the Proposed Development has been finalised.</p>	<p>Pegasus’ EIA LVIA Methodology is included in <b>Appendix 6.1</b> (document reference 6.3.6.1).</p> <p>The design of the Proposed Development has been finalised and is indicated on <b>Figure 6.2 Landscape Strategy Plan</b> (document reference 6.2.6). Application drawings and height parameters are provided as part of this ES.</p> <p>Public Footpath PROW Heck/15/1 is only accessible along its western section, which largely coincides with Crab Lane. It is disconnected from its western section that runs along the northern edge of the Energy Park.</p>
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	<p>into a wider network to the east, is a relatively long section (more than 1.6 miles) of PROW that should be considered in the assessment.</p>		<p>PROW Heck/15/1 - It was agreed at the meeting with LLC’s landscape advisor that this location will not be included as a specific static receptor.</p>
	<p>Identification of receptors</p> <ul style="list-style-type: none"> <li>• The PEIR identifies a range of landscape and visual receptors within the Study Area.</li> <li>• The correct National and Local Landscape Character Areas (LCA) have been referred to within the PEIR and cover a range of scales, and there is potential to scope out character areas that would not be affected by the development or those that are at a large scale and would provide context only, such as NCAs.</li> <li>• Paragraphs 6.4.14 to 6.4.19 - Potential landscape receptors at varying scales are identified for consideration in the LVIA. We would also expect a finer-grained site-level (and immediate context) assessment and identification of individual elements or features of the site and landscape/landscape character areas to form the baseline of the LVIA.</li> <li>• It would be useful to take into account the information collated as part of the Historic landscape characterisation project: The Historic Character of The</li> </ul>	<p>The design of the Proposed Development has evolved and the extension to the Bicker Fen Substation now forms a relatively modest element screened from the majority of public views and sensitive receptors. This is further explained in this <b>Chapter 6</b> (document reference 6.1.6).</p> <p>Further consultation has been carried out; viewpoint selection was discussed and agreed with LLC’s landscape advisor</p>	<p>Noted regarding NCA and local level landscape character receptors. The information contained in the published The Historic Character of The County of Lincolnshire and the accompanying report ‘The Historic Landscape Character Zones’ has been reviewed to inform the baseline, assessment and the proposed mitigation landscape proposals.</p> <p><b>Figure 6.5a Screened Zone of Theoretical Visibility - Solar Areas and Proposed Viewpoint Locations Plan</b> (document reference 6.2.6).</p> <p><b>Figure 6.5b Screened Zone of Theoretical Visibility - Substation Equipment with EES and Proposed Viewpoint</b></p>

	<p>County of Lincolnshire (September 2011), to ensure that the development is sensitive to the historic landscape. The project documents and the mapping can be accessed here: Historic Landscape Characterisation – Lincolnshire County Council</p> <ul style="list-style-type: none"> <li>• Paragraphs 6.4.34 - Nineteen viewpoints have been identified within the PEIR, which are located on Figures 6.3a, 6.3b, and 6.3c. As mentioned, the visual receptors and viewpoints were previously discussed with AAH, with initial comments on receptors and viewpoints provided and additional viewpoints or amendments recommended. At this stage, these have not been incorporated into the PEIR and so we would request further discussions and meetings are held between AAH and other stakeholders with Pegasus. Also, as stated and noted in previous correspondence, at this stage, there are not fixed details on the location and appearance/extent of taller/larger elements that form part of the development, which would likely have visual impacts that may require additional viewpoints beyond those initially identified. Additional viewpoints of development at the Bicker Fen Substation (currently on viewpoint 15 would likely cover this) may also be required once final design or parameters have been developed.</li> </ul>	<p>during an on-line meeting held in September 2022.</p>	<p><b>Locations Plan</b> (document reference 6.2.6).</p> <p><b>Figure 6.5c Screened Zone of Theoretical Visibility - National Grid Bicker Fen Substation Extension Works and Proposed Viewpoint Locations Plan</b> (document reference 6.2.6).</p> <p><b>Appendix 6.8</b> (document reference 6.3.6.8) and <b>Appendix 6.9</b> (document reference 6.3.6.9) provide viewpoint assessment.</p>
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	<p>Paragraph 6.5.2 - the assessment of Landscape Character Effects gives an initial judgement on the level of effect; however we would urge caution in regard landscape character areas, which often are assessed as having limited magnitudes of change as the change would be small scale and/or extent (development site) would only affect a small percentage of the overall, much larger, character area. Using this approach, any development in a large character area will always be deemed relatively "small". We would encourage the LVIA assess what the change would be in that part of the character area and what identified key elements identified within the character areas are impacted, and how development change would affect those elements or characteristics.</p> <p>As commented under 'Noise and Vibration' a 3m high barrier has been used in the noise modelling however no such barrier is shown or assessed within the PEIR at this stage. If a barrier is proposed then the type of barrier proposed (e.g. fence of earth bund) should be identified and its potential impacts also assessed and taken into consideration as part of the LVIA.</p>	<p>The design of the Proposed Development has been finalised.</p>	<p>Comments noted with regard to the landscape character assessment. Section 6.5 of this <b>Chapter 6</b> (document reference 6.1.6) addresses this issue.</p> <p><b>Chapter 4</b> provides detailed information with regard to the Proposed Development.</p> <p><b>Figure 6.2 Landscape Strategy Plan</b> (document reference 6.2.6).</p>
<p>Lincolnshire Police</p>	<p>The use of natural vegetation as a feature should not compromise the benefit of clear and unobstructed natural and formal (CCTV System) surveillance.</p>	<p>Noted. No further comments.</p>	
	<p>Use of Defensive Ditches and Berms (Bunds)</p>	<p>n/a</p>	<p>The Energy Park is enclosed by ditches / drains and embankments</p>

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	Landscaping techniques such as ditches and berms (bunds) may also be appropriate in some instances. To be effective in stopping vehicles these need to be designed carefully. Police can provide further specific advice in relation to the design of such defences upon request. There should be a minimum number of vehicular access points onto site, ideally only one.		associated with Head Dike, Holland Dike and Skerth Drain. These are considered to be highly effective in restricting access into the Energy Park. Perimeter fence and new hedgerow would further secure the Energy Park.
National Grid Electricity Transmission (NGET)	If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.	Noted. No further comments.	Noted. No further comments.
Natural England	Chapter 6: Landscape and Visual Impact- Natural England have no specific comments to make on landscape and visual impacts.	Noted. No further comments.	Noted. No further comments.
North Kesteven District Council	6.3.9 The PEIR identifies the extent of the Study Area of the development of up to 3km at paragraph 6.3.9, which defines the spatial scope of the area to be addressed, however the ZTV and PEIR (paragraph 6.3.6 and 6.3.7) does identify potential visibility beyond 3km. The LVIA Chapter should therefore include a clear statement, similar to that provided within paragraphs 6.3.6 to 6.3.9, on the justification for the extent of the Study Area.  6.3.15 It is noted that the LVIA chapter and associated appendices and figures were prepared in advance of	The design of the Proposed Development has been finalised.	This <b>Chapter 6</b> (document reference 6.1.6) provides further justification with regard to the study area and its extent.  The viewpoint selection was finalised and agreed with LLC's landscape advisor during an on-line meeting held in September 2022.

	<p>the suggested inclusion of additional VPs. We understand that these are to be incorporated into the final ES. As such we do not wholly agree with the PEIR’s statement that ‘representative and illustrative viewpoints have been agreed with Lincolnshire County Council and North Kesteven District Council through the Scoping Report submitted to the Planning Inspectorate’.</p> <p>6.3.24 This paragraph identifies “overhead electricity cables on 30m high poles within the Energy Park”. The extent and location of these needs clarifying as part of the ES to allow for the LVIA to consider these within the assessment.</p> <p>6.3.25 The ES should identify buildings and infrastructure across the energy park site that are intended to be lit, whether these are adjacent to existing or proposed hedgerows, technical details of lux, sky glare/glow, spillage, any cowling to used, ILE Environmental Zone standards to be applied (NKDC suggests Zone E1) and measures to control the operation of external lighting</p> <p>6.3.57 The policy section could be expanded to reference NPPF paragraph 131 regarding the value of retained trees</p> <p>6.3.64 This section refers to CLLP policies LP17 and LP19 but also needs to reference CLLP policies LP26 and LP55. The chapter should also refer to (and discuss</p>		<p>The previously considered overhead electricity cables on 30m poles no longer form part of the Proposed Development.</p> <p>The lighting associated with the construction and decommissioning phases would be limited where practical, subject to the timing of the construction activities and time of the year, and is considered to be short term effect. There is no permanent lighting proposed as part of the Proposed Development except for localised emergency security lighting in proximity to the substations and control buildings. Such lighting would be triggered by movement only and so would not be active for all hours of darkness. CCTV to be installed along the</p>
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	<p>overall compliance with) emerging CLLP submission draft design policies</p> <p>6.3.65 There could be cross reference here to CLLP Biodiversity Opportunity Mapping Study objectives. As set out above under the sub-heading of ‘alternatives’ the ES should consider and evidence more broadly the interplay between on-site BMV, BNG and the disposition of buildings and infrastructure in the consideration of alternative layouts</p> <p>6.5.9 It might be useful to identify the individual or clusters of dwellings where different conclusions are drawn and briefly explain why they vary</p>		<p>security fencing and onsite would utilise infrared technology.</p> <p>Policy section with regard the NPPF has been updated and expanded.</p> <p>Policy section with regard the CLLP has been updated and expanded.</p> <p>BNG and biodiversity issues are covered in <b>Chapter 8</b>.</p> <p>Effects upon residential receptors are detailed in <b>Chapter 7 RVAA</b> (document reference 6.1.7).</p>
	<p>6.5.12 We agree with the overall assessment in terms of effects for motorists from the A17 however it might be helpful to provide an annotated plan showing the parts of the A17 corridor where site views start to appear and change</p> <p>6.5.22 It might be helpful to estimate the overall area of the NKDC Fenland LCA sub-area (by proportion of overall LCA area) which will be subject to significant adverse effects in the same way that the ES proposes to set out proportions/percentages of change or loss in relation to BMV ALC impacts</p> <p>6.5.25 If there are localised variations in terms of estimated effects then it would be helpful to identify these through either individual properties or clusters.</p>	<p>The design of the Proposed Development has been finalised.</p>	<p>Effects upon the receptors associated with A17 are detailed in Section 6.5 of this <b>Chapter 6</b> (document reference 6.1.6).</p> <p>The preference expressed in this <b>Chapter 6</b> (document reference 6.1.6) is for a qualified narrative assessment rather than quantifying the effects – as advocated by the GLVIA3.</p>



	<p>6.5.27 The ES should map where the central and southern parts of Sidebar Lane are and by reference to mapping the approximate parts of Sidebar Lane/the B1395 where significant adverse effects are likely to occur and conversely those parts that transition away from significant adverse effects.</p> <p>6.63 There is suggestion elsewhere in the PEIR that there might be some loss of the edge of woodland blocks to accommodate access works. This should be clarified. In addition there is only limited reference as to how the BNG areas' location assists with mitigation by providing undeveloped buffer blocks along the B1395 Sidebar Lane/SW corner of the site.</p> <p>6.64 It would be helpful if the ES expands with discussion on the existing/natural or proposed screening of the other elements i.e. The 132kv substations etc and the degree to which screening can/cannot be provided by way of partial mitigation from the respective VPs. If woodland block co-location does not alter the overall significance of impact from a specific VP then better that the ES acknowledges that alternative siting or layouts of the substation infrastructure does not/cannot reasonably alter overall findings.</p> <p>6.7.4 The table of cumulative schemes doesn't include the proposed Temple Oaks NSIP solar farm near Folkingham which post-dated EIA Scoping. However it is expected that there will be no cumulative LVIA impacts given the degree of separation involved.</p> <p>6.8.28As above it might be helpful to estimate the</p>		<p>Effects upon residential receptors are detailed in <b>Chapter 7</b> RVAA (document reference 6.1.7).</p> <p>Effects upon the receptors associated with Sidebar Lane are detailed in Section 6.5 of this <b>Chapter 6</b> (document reference 6.1.6).</p> <p>The Proposed Development seek to retain the existing vegetation.</p> <p>The Onsite Substation and Energy Storage System is now centrally located near the built form and vegetation associated with Six Hundreds Farm.</p> <p>The cumulative schemes have been reviewed and addressed in Section 6.7 of this <b>Chapter 6</b> (document reference 6.1.6).</p>
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	<p>overall area of the NKDC Fenland LCA sub-area (by proportion of overall LCA area) which will be subject to cumulative significant adverse effects in the same way that the ES proposes to set out proportions/percentages of change or loss in relation to BMV ALC impacts.</p>		<p>As above, with regard to the cumulative landscape character effects, The preference expressed in this <b>Chapter 6</b> (document reference 6.1.6) is for a qualified narrative assessment rather than quantifying the effects – as advocated by the GLVIA3.</p>
	<p>VPs 1-4,6,8 We note and agree that VPs 1-4, 6 and 8 are set within the 'significant adverse' category; although VP8 is set further away from the energy park boundary beyond the eastern edge with intervening field hedge boundaries along Head Dyke etc providing some filtering.</p> <p>We note that the PEIR chapter and the associated Appendix documents do not contain all post-development photomontages and therefore our comments are restricted to the information provided to date. As outlined within Chapters 3 and 4 of the PEIR, the development proposals are still being developed and finalised. This includes the type of panel and location and design of taller/larger elements such as substations and battery storage. While it is understood that some aspects of the scheme are unlikely to be detailed until the tendering has been completed, we would expect a reasonable level of design fix for the final ES which would clearly set out the parameters of</p>	<p>The design of the Proposed Development has been finalised.</p>	<p>Further details of the potential visual effects are detailed in <b>Appendix 6.8</b> (document reference 6.3.6.) and <b>Appendix 6.9</b> (document reference 6.3.6.9).</p> <p>With regard to the proposed planting strategy, a new perimeter and internal hedgerows are being proposed; these would be allowed to grow out to develop into approximately 3m – 3.5m hedgerow lies with small scale hedgerow trees.</p> <p>The published NCA 46 The Fens refers to the sense of openness, distant views, and sparse</p>

	<p>the development, such as heights and locations of elements that have been used in the assessment, which if there are still some outstanding design and layout elements to be finalised should be based on a “worst case” scenario to ensure any effects are not underplayed. This is particularly important for larger and taller elements such as sub-stations or battery storage.</p> <p>We also consider that the landscape mitigation strategy is under-developed at this stage. Paragraph 6.8.25 notes that ‘existing hedgerows and lines of trees within the Energy Park would be protected and enhanced with gapping-up using appropriate species. New hedgerows would be established along the southern and western edges of the solar modules, and within the Energy Park. Further design options for mitigation measures, and species selection, are currently being considered’. We have previously identified and recommended that to help the site better assimilate into the landscape that there should be Some elements of tree and copse planting at strategic locations to break/filter views; not least of the larger elements of infrastructure (e.g. the BESS) when travelling along the A17. Map regression suggests that the site historically had linear bands of copses running north/south. The PEIR suggests that soft landscaping would be restricted to new or bolstered hedge planting but which seems to be a missed opportunity in light of the size of the site and not least given the location and extent of buffer zones and BNG opportunity areas.</p>		<p>vegetative cover. The proposed mitigation planting aims to strike a balance between the need to mitigate the adverse effects and avoid creating strong lines of tree canopies that would block views across Heckington Fen.</p>
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South Kesteven Council	The site is sufficiently separated and screened from South Kesteven such that there would be no landscape and visual impacts of concern from the Energy Park aspect of the proposal. Further, the large area identified to the south of the site for potential underground cabling is unlikely to result in any significant landscape and visual impacts.	Noted.	Mitigation planting ensures that any adverse effects would be geographically highly localised, reduced, and mitigated against.
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