

# Heckington Fen Solar Park

EN010123

## Change Consultation Report

Applicant: Ecotricity (Heck Fen Solar) Limited

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# 1. Introduction

1. This Change Consultation Report (the Report) details the targeted consultation activities carried out by Ecotricity (Heck Fen Solar) Limited (the Applicant) for Heckington Fen Solar Park (the Project) between July and August 2023.
2. The Report follows submission of the Project's Development Consent Order (DCO) application in February 2023 (the Application). The Project is classified as environmental impact assessment (EIA) development for the purposes of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and accordingly the Application included an Environmental Statement (ES) together with other associated documents and plans in accordance with the requirements for a DCO under the Planning Act 2008 (the Act).
3. The Application is for development consent to construct, operate, maintain and decommission a solar photovoltaic (PV) electricity generating facility with a capacity of over 50 megawatts (MW) with associated energy storage, and export connection to National Grid Bicker Fen Substation.
4. The Application was submitted to the Secretary of State via the Planning Inspectorate on 15 February 2023 and accepted for examination on 13 March 2023.
5. Full details of how the Applicant complied with the Act and associated legislation in relation to pre-application consultation for the Project can be found in the Consultation Report (document reference 5.1 / (APP-022)), submitted as part of the Application. The Consultation Report was prepared to fulfil Section 37(3)(c) and Section 37(7) of the Act, and to show how the Applicant has complied with Sections 42, 47, 48, and 49 of the Act.
6. This Change Consultation Report focuses solely on the activities undertaken for the targeted Change Consultation. In accordance with Advice Note 16, it details the consultation undertaken, the stakeholders consulted (as per the Cover Letter sent to the Planning Inspectorate), the Applicant's consideration of the responses received, and the newspaper notices published.
7. The Change Consultation Report is structured as follows:
  - Section 2: A summary of the Project Change
  - Section 3: A summary of early engagement
  - Section 4: An overview of the approach to consultation
  - Section 5: A summary of the consultation activities undertaken and how the Applicant took account of the views raised

## 2. Overview of the Project Change

8. The accepted Application includes land and works at National Grid's Bicker Fen Substation (Bicker Fen Substation) to provide for a new generation bay for the Applicant together with works to facilitate the connection for the Project.
9. Following submission of the Application, and as a result of ongoing discussions with National Grid Electricity Transmission Plc (NGET), it became clear that additional works at Bicker Fen Substation are required to enable the grid connection.
10. The Applicant's proposed change relates to land at Bicker Fen Substation, which is under the ownership of NGET. These works lie outside of the current Order Limits at the Bicker Fen Substation. The works are Associated Development which is necessary as a consequence of the Proposed Development and includes:
  - a new section of NGET infrastructure at the substation comprising a busbar extension including a section breaker, a bus coupler and a feeder circuit on land to the south of Bicker Fen Substation (Additional Work Area1 - AW1); and
  - a new cable sealing end compound (CSE) on land to the west of Bicker Fen Substation (Additional Work Area 2 - AW2); together known as, the "Additional Works".
11. Accordingly, a larger area (of approximately 0.9ha) is needed to deliver the Additional Works and to facilitate the Applicant's connection into the Bicker Fen Substation.
12. The Additional Works must be delivered by NGET in order for NGET to be able to connect the Project, whilst maintaining compliance with the infeed loss risk at Bicker Fen Substation. The Additional Works are therefore infrastructure works and assets which will be built and owned by NGET, but are triggered by the new connection.
13. The Applicant's Proposed Development is the "tipping point" of generation, necessitating a new section. The reason for this change now is due to further technical information being known and for completeness to ensure that the DCO contains the relevant provisions and permissions to allow the full project to be constructed; it also gives a complete picture of the related environmental impacts associated with the NGET connection works.
14. This position is supported by the emerging National Policy Statements for Electricity Networks (EN-5) which encourages holistic planning – particularly at paragraph 2.7.1 and 2.7.2, which includes the following text:

*"EN-1 explains in Section 4.10 that the Planning Act 2008 aims to create a holistic planning regime, such that the cumulative effects of the same project can be considered together.*

*Accordingly, the government envisages that, wherever reasonably possible, applications for new generating stations and their related infrastructure should be contained in a single application to the Secretary of State...*

15. Furthermore, the principle of including wider associated development is supported in guidance on associated development applications for major infrastructure projects where at paragraph 5(iv) guidance states that associated development should be proportionate to the nature and scale of the principal development.
16. A joint position statement has been prepared by the Applicant and NGET to explain the reasons for the change and to demonstrate agreement on the proposals. A copy of the joint position statement is included in **Appendix 1**.

### 3. Early engagement on the Change Consultation

17. Prior to the Change Consultation, the Applicant undertook early engagement with the Planning Inspectorate.
18. In view of the localised nature of the changes, the Applicant considered it was proportionate to adopt a targeted consultation limited to those relevant “EIA consultation bodies”<sup>1</sup> and relevant local stakeholders.
19. Therefore, in advance of the Change Consultation, the Applicant identified the relevant and affected stakeholders it proposed to undertake targeted consultation with from the Project’s Section 56 consultee list.
20. The Applicant sent a request to the Planning Inspectorate on 13 June 2023 notifying of the intention to submit a request to make changes to the Application. The request included a proposed targeted list of consultees to allow a more focused consultation.
21. The Applicant’s letter to the Planning Inspectorate, which includes the proposed reduced list of consultees, is included at **Appendix 2**.
22. On 16 June 2023, the Planning Inspectorate published a [letter](#) on the Heckington Fen Solar Park page of the Planning Inspectorate’s website in response to the request (PD-008).
23. The letter confirmed the Planning Inspectorate was satisfied that the Notification of Proposed Changes document met Step 1 of the recommended procedure in the Planning Inspectorate’s Advice Note 16: ‘Requests to change applications after they have been accepted for Examination’ (AN16).
24. Specifically in relation to consultation, the Planning Inspectorate noted the Applicant’s intention to carry out a proportionate and targeted consultation on the proposed changes with the reduced list of consultees. The letter confirmed the Applicant should provide a minimum of 28 days for responses to the consultation, newspaper and site notices should be posted, and consultation responses should be directed to the Applicant and not the Planning Inspectorate.
25. The Planning Inspectorate also advised that any plans included within consultation documents should be clear, and any annotations on plans or photographs should be easily visible.

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<sup>1</sup> As defined in Regulation 3 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

## 4. Approach to Consultation

### 4.1 Consultation principles and accessibility

26. The Applicant carried out the Change Consultation, so far as relevant and proportionate, in accordance with the principles and methods set out in the Statement of Community Consultation (document reference 5.1 – Appendix 15 / APP-037 and APP-038) dated June 2022.
27. Feedback was welcomed and the Applicant sought to make it as easy as possible for people to respond by including multiple methods for consultees to give their views and comments on, and ask questions about, the Project. To achieve this, consultees were able to provide their feedback through a variety of channels.
28. A digital led-approach was implemented to ensure the proposals could be viewed online, on the Project website, and feedback could be provided via email.
29. Consultees were encouraged to view details about the Change Consultation through the Project website (<https://www.ecotricity.co.uk/our-green-energy/heckington-fen-solar-park>) which was clearly signposted in materials advertising the consultation.
30. The dedicated consultation email address ([heckingtonfensolar@ecotricity.co.uk](mailto:heckingtonfensolar@ecotricity.co.uk)) allowed consultees to provide feedback and request further information. This inbox was monitored by members of the Project team.
31. A USB stick with the Change Consultation materials uploaded was also available on request. Two requests for a USB stick were made during the consultation period on 12 July 2023. The Applicant prepared the USBs with consultation documentation and posted them on 18 July 2023, within a week of the requests being made.
32. Non-digital methods were also utilised to provide alternative means for consultees to engage with the proposals, including providing a hard copy version of all materials on request (free of charge) and enabling consultees to provide feedback verbally and in writing. Upon request, the documents would be made available in alternative accessible formats. No requests for hard copies or alternative formats of the materials were made.
33. Consultees were able to provide feedback and request further information via a dedicated freephone line (0800 151 0784), which was in operation from Monday to Friday between the hours of 8:30am and 5:30pm. People could leave voicemails outside of these hours, and were responded to at the earliest opportunity, ensuring information was readily available and queries or concerns addressed.
34. If individuals preferred to provide feedback via post they were able to use the Freepost address (FREEPOST ECOTRICITY SOLAR PARK) which was open and available throughout the consultation period.

35. Despite undertaking a targeted consultation due to the localised nature of the changes, anyone directly impacted by the Project was welcome to take part.

#### **4.2 Processing and analysing responses**

36. The Applicant considered all consultation feedback received to the Change Consultation, including from organisations not in the Applicant's reduced consultee list.

37. All responses received were carefully considered by members of the Project team and any specific design requests, or requests relating to land acquisition or interests, were passed to the relevant members of the Project team. Such requests were addressed or incorporated into the proposals where appropriate and feasible.

38. **Section 5** summarises the key themes and issues that arose from the feedback, the Applicant's responses to these issues and regard had for them.



## 5. Change Consultation

### 5.1 Overview

39. This chapter sets out the consultation activities that the Applicant undertook as part of the Change Consultation, the responses received, and how the Applicant had regard to them.
40. The consultation period ran from 11 July 2023 to 18 August 2023, providing more than 30 days to respond to the proposals.
41. The Applicant wrote to its reduced consultee list via letter on 7 July 2023, which was sent via first class post. The letter included a summary of the changes sought, explained the consultation documentation and where consultees were able to respond to the proposals. An example copy of the letter is included in **Appendix 3**. Where email addresses were available, a copy was also sent via email.
42. Furthermore, the Applicant wrote to parties it had kept up to date throughout the Project's development. These were bodies that were not considered necessary to consult as part of the 'targeted consultee list' but the Applicant has updated them as a matter of courtesy. The Applicant sent an email to these stakeholders on 7 July 2023. Where postal addresses were known, the Applicant also sent a letter via second class post on the same date. These parties sat outside the formal statutory and statutory stakeholder consultees, and included individuals and organisations such as local councillors, MPs and community groups. This list of additional stakeholders the Applicant emailed are included within **Appendix 2**.
43. Whilst not strictly required, in keeping with the themes of the EIA Regulations (as suggested by paragraph 6, Figure 2b of Advice Note 16), as part of publicising the Change Consultation, the Applicant published a notice for one week in a national newspaper and the London Gazette, and for two consecutive weeks in a local newspaper. Copies of the notice as it appeared in the relevant newspapers are included in **Appendix 4**.
44. The publication dates of each notice is detailed in **Table 5.1** below.

**Table 5.1: Publications and dates**

Publication	First Publication Newspaper	Second Publication Newspaper
Lincolnshire Free Press	11 July 2023	18 July 2023
London Gazette	11 July 2023	n/a
The Guardian	12 July 2023	n/a

45. In addition to publishing notices in local and national newspapers, on 6 July 2023 seven copies of the notice were put up on site near to the location of change. This included at Bicker Fen Substation, intervals along the grid route and around the vicinity of the Energy Park.
46. The notice set out how the consultation documents could be inspected and included the timescales for making a representation to the Applicant. Photos of the notices put up on site are included in **Appendix 5**.
47. The consultation document outlining the changes was uploaded onto the Project website (<https://www.ecotricity.co.uk/our-green-energy/heckington-fen-solar-park>), where it was available to be viewed and downloaded free of charge. A copy of the document is included in **Appendix 6**.
48. Copies of the consultation document were also made available in hard copy from 11 July 2023 at community access points outlined in **Table 5.2** below.

**Table 5.2: Community access points hosting the consultation document**

<b>Venue</b>	<b>Opening hours</b>
Boston Borough Council, Municipal Buildings, West Street, Boston, Lincolnshire, PE21 8QR	08:45 – 17:15 Monday to Thursday 08:45 – 16:45 Friday
Heckington Community Hub, Council Chambers, St Andrew’s Street, Heckington, Sleaford, Lincolnshire, NG34 9RE	10:00 – 12:00 Monday to Saturday

## **5.2 Summary of consultation submissions**

49. Out of the reduced consultee list included in **Appendix 2**, 19 consultees responded. Further to this, 4 responses were received from organisations or individuals not included within the reduced consultee list.
50. A summary of all the consultation submissions can be found in Table 5.3 below and where relevant, the Applicant has provided a response.

**Table 5.3: Summary of consultation responses**

<b>Organisation</b>	<b>Date of correspondence</b>	<b>Topic area</b>	<b>Summary of Consultee's submission</b>	<b>Regard had by the Applicant</b>
Vodafone	7 July 2023	General	Confirmation of no objections to the proposals.	The Applicant notes this comment.
GTC	7 July 2023	General	Confirmation GTC has no assets within the vicinity of the proposed changes at the Bicker Fen Substation.	The Applicant notes this comment.
Equans	7 July 2023	General	Confirmation Equans has no assets within the vicinity of the proposed changes at the Bicker Fen Substation.	The Applicant notes this comment.
HSE	10 July 2023	General	Confirmation HSE has no comments on the proposals.	The Applicant notes this comment.
Forestry Commission	10 July 2023	Arboriculture	<p>We note the now proposed loss of part of the plantation woodland near the Bicker Fen Substation and that in the Change Notification Consultation Information Leaflet, you state that the “direct adverse effects would be balanced by the proposed orchard planting”.</p> <p>As the proposed orchard planting was included in the application prior to the change requiring the loss of the woodland, you may wish to consider further additional planting as compensation.</p> <p>We would usually recommend that planting should be targeted to enhance existing woodland and ecological networks by buffering the existing woodland to create larger</p>	<p>The Applicant has discussed the possibility of further additional planting at the Bicker Fen Substation with NGET. Unfortunately, due to land and technical constraints, additional planting at the Bicker Fen Substation is not possible.</p> <p>However, the Applicant's conclusion is that mitigation is not required or feasible to the south of the Bicker Fen Substation; this is primarily due to the limited value the current trees have on screening views from any sensitive visual receptors.</p> <p>Therefore, as 'compensatory replacement' the Applicant has included an additional area of tree planting in the north of the Energy Park site, and within the hedgerow proposed on the northern boundary. These will increase the number of new trees associated with the overall scheme, as well as offering additional screening to the</p>

			<p>blocks of ideally at least 5ha. Species and provenance of new trees and woodland need to be considered to establish a more resilient treescape which can cope with the full implications of a changing climate. When planting new trees and woodland, ensure that biosecurity is robust to avoid the introduction of pests and diseases.</p> <p>The rest of the plantation woodland also appears to be unmanaged. Sustainable forest management involves ensuring that the balance of all woodland benefits is maintained over the long term. This goes beyond timber production to encompass carbon, biodiversity and social benefits as well as many other elements.</p>	<p>single property to the north of the Energy Park, and a cluster of trees which fits the landscape of 'shelter belt' plantations within the flat fenland landscape.</p> <p>The tree planting proposed within the hedgerows would use species suitable for the area, and would be sourced from appropriate suppliers to reduce the risk of pests and diseases.</p> <p>The plantation woodland on the Energy Park and at Bicker Fen are not available for timber production as far as the Applicant is aware. The social benefits of the Community Orchard on the Energy Park will be recognised with access by arrangement to local groups, parish councils and the neighbouring school. The biodiversity impacts will be improved with the addition of hedgerows, and the removal of chemical run off associated with the farming on the Energy Park.</p>
Local Resident	16 July 2023	Access	<p>I am assuming that Ecotricity will honour their undertaking that none of their traffic associated with this proposal scheme will use Ing Drove / Cowbridge Road Bicker. Also that National Grid (NG) will try to use these roads for the proposed substation expansion construction traffic, in defiance of the edict from Boston Borough Council that the roads in question are unsuitable for construction traffic. This is the basis, together with Health and Safety concerns and parts of the Human</p>	<p>The Applicant has included the Triton Knoll access track in the Order Limits to ensure it can be used for the Applicant's construction traffic. An Outline CTMP (document reference 7.10 (Rev 3)) is provided with the Change Application which details that construction traffic for the Applicant will use the Triton Knoll access track. At this time, it is not possible for National Grid to commit to using the Triton Knoll access track but the Applicant is exploring this further with National Grid.</p> <p>The traffic figures provided by National Grid were based on similar projects, for example</p>

			<p>Rights Act that their proposed use of Ing Drove / Cowbridge Road will be opposed by all means possible. NG do not say which route they propose, but if it is the road off the A17 (which will affect nobody) then residents' objections would be withdrawn.</p> <p>The suggested level of traffic (over 2000 vehicles) is not negligible, and in any event it is certain that as with all the other projects over the last twenty years the actual traffic levels will be very substantially higher than suggested. In no instance has the traffic level been less than three times more than NG's "calculation", and in some instances has been a much higher multiple.</p>	<p>Viking Link. The number of vehicles assumes NGET and the Applicant's traffic across a 60-week period. The applicant is working with NGET to understand ways to lessen the impact on local roads.</p>
		Access	<p>There is no detail of the proposed route, dates of work, daily / weekly time restrictions, speed limits or traffic control (vehicles cannot pass on Cowbridge Road). The details given are totally inadequate and contain no cumulative details of all the other schemes which could overlap or be running at the same time.</p> <p>A fully coordinated plan covering all the known schemes is needed. The physical and mental health of local residents has been severely undermined over large periods of the</p>	<p>Further details are provided in the Outline CTMP (document reference 7.10 (Rev 3)), but in summary, this shows traffic associated with the Heckington Fen Solar Park development utilising the Triton Knoll access track. There could be exemptions to this, but the intention is that all traffic working on the Applicant's new generation bay extension at Bicker Fen Substation will use the Triton Knoll track for access.</p> <p>As secured in paragraph 7.9 of the outline CTMP (document reference 7.10, Rev 3), the timings of works will be Monday - Friday 8am to 6pm, and Saturday 8am to 1pm. Speed limits will be in line with the current speed restrictions.</p>

			last twenty years and this cannot continue.	Cumulative schemes are considered in the traffic and access assessment (Chapter 14) (document reference 6.1.14 (Rev 2)). The cumulative schemes known to the Applicant are considered in the application documentation, and utilisation of the Triton Knoll access track is proposed to help reduce the impact on local residents. It is not possible at this time to commit that National Grid, or other schemes, will use the Triton Knoll access track as this would need to be agreed with the owners and/or further studies would be needed to understand the suitability of the track for other users NGET.
		Access	<p>Please therefore add all the details from the Planning Inspectorate submission of 16/5/23 to the OBJECTION.</p> <p>Objections will be lodged with the Planning Inspectorate, Lincolnshire County Council, Boston Borough Council and appropriate local councillors requesting enforcement of the edict that Ing Drove / Cowbridge Road are unsuitable for construction traffic.</p> <p>Please acknowledge receipt and confirm that no Ecotricity traffic associated with this proposed scheme will use Ing Drove / Cowbridge Road.</p>	The Applicant acknowledges receipt of this representation and confirms that none of the Applicant's traffic associated with the Proposed Development will use Ing Drove / Cowbridge Road. At this time, it is not possible for National Grid to commit to using the Triton Knoll access track but the Applicant is in continued dialogue exploring this further with National Grid.
BT Openreach	18 July 2023	General	Confirmation the proposed changes does not alter BT Openreach's position.	The Applicant notes this comment.

Local Resident	19 July 2023	Mitigation	<p>The environmental mitigation measures outlined in Table 19.1 of the Environmental Statement, Appendix 8.1 Preliminary Ecological Appraisal (DCO document reference 6.3.8.1) should be mandatory and binding on the developer. There should be follow up checks by the authorities. Environmental matters are rarely high on the list of priorities for developers and are often the first casualty once the work has commenced.</p>	<p>The Applicant notes no Table 19.1 is located within Appendix 8.1 – Preliminary Ecological Appraisal (DCO document reference 6.3.8.1 / APP-190), nor are there any other tables or a list of mitigation measures in Appendix 8.1. A review of all ecology documentation within the Environmental Statement does not show a Table 19.1. Table 19.1 in Chapter 19 - Summary does not outline ecological environmental mitigation measures.</p> <p>Nevertheless, ecological mitigation measures are outlined in Table 8.7 - Proposed Mitigation Measures of Chapter 8 - Ecology and Ornithology (DCO document reference 6.1.8). The Environmental Statement is a certified document under Schedule 11 of the DCO. The mitigation measures indicated in Table 8.7 are further secured within the control documents - Outline Landscape Ecological Management Plan (DCO document reference 7.8) and Outline Construction and Environmental Management Plan (DCO document reference 7.7). In accordance with Requirement 8 and Requirement 13, these outline plans are secured as part of the DCO at Schedule 2 (document reference 3.1), and the final LEMP and CEMP must be in accordance with the outline plan. The measures are therefore secured and legally enforceable by the relevant planning authorities.</p>
		Agriculture	<p>Concern that the site is currently a field sown with winter wheat, so the solar park is not the best use of this land. Food security is important for the</p>	<p>The Applicant notes that this response is not solely related to the Change Application.</p>

			<p>UK. We should aim to cut imports and become more self-sufficient. The Lincolnshire soils are in a good position to achieve this aim.</p> <p>I'm opposed to the proposed development.</p>	<p>In respect of the wider matters surrounding agricultural land, the Applicant refers this consultee to the Consultation Report Appendix 18 – Hearing your views, submitted with the Application (document reference 5.1.18).</p> <p>In short, the Applicant notes that the land for the solar park will still be classified as agricultural land. The area underneath and around the panels is proposed to be managed as a nature conservation pasture with sheep grazing.</p> <p>Over 80% of the land is grade 3 land, and suffers the usual constraints of heavy soils, notable blackgrass infestation and a general susceptibility to wetness, both of which constrain farming activities.</p> <p>The Site is used for winter wheat as very little else can be grown. An alternative could be miscanthus which offers no food security.</p> <p>The Project would provide energy storage to help balance supply and demand.</p>
National Grid Viking Link	25 July 2023	Utilities	<p>Confirmation National Grid's apparatus will be affected by the proposals.</p> <p>National Grid will be able to provide guidance on the required procedures for entering into a Works Consent and provide confirmation on permitted development and intrusive activities upon request. Work should not be undertaken without first contacting</p>	<p>Whilst the Applicant notes this response is not strictly in the context of the Change Application and the additional works proposed under the Change Application do not affect National Grid Viking Link's apparatus to a greater or lesser extent, the Applicant acknowledges National Grid Viking Link's position in relation to the wider project. National Grid Viking Link benefit from the protective provisions at Part 1 of Schedule 13 and the Applicant is in the process of</p>



			<p>National Grid for advice and, if required, a Works Consent.</p> <p>Landowners and third parties have a duty of care not to carry out any works that have the potential to damage National Grid apparatus. This duty of care applies in all situations. Examples of such works are mineral extraction, mining, explosives, piling and windfarms.</p> <p>Implementation of any unapproved work that affects the National Grid asset may result in serious consequences in terms of health and safety, expense and other attendant liabilities. In such cases it is the perpetrator of the act, together with any other promoting organisation, that shall be held fully accountable for any resulting damage.</p>	discussing whether bespoke protective provisions will be required.
Boston Borough Council	28 July 2023	Siting	One area labelled AW2 is screened by the existing substation and Boston Borough Council have no objections to it.	The Applicant notes this comment.
		Arboriculture	The other area labelled AW1 requires the removal of trees that were planted when the substation was constructed in order to screen it which is disappointing. They are on the southern boundary and so visual impact is lessened by the fact that few people will venture here as it is very remote.	<p>The Applicant notes this comment.</p> <p>The Applicant agrees that the area to the south of the substation is very remote and this supports the Applicant's conclusion that the trees had limited screening purpose.</p> <p>Gas-Insulated Switchgear (GIS) infrastructure is typically only offered in exceptional</p>

			<p>The amount of trees to be removed depends on what type of infrastructure is used. One type (Air insulated) requires a large amount, the other (Gas insulated) requires less and would be in a building. A row of oak trees on the frontage are to remain.</p> <p>The trees are not protected by a TPO and even if they were by virtue of the interplay between Article 14(1)(a)(iii)(cc) of the TPO regs 2012 and Part 15 Class B(a) of the GDPO development of up to 29 cubic metres would allow their removal. However, it seems this proposal requires permission as if it is not covered by the DCO an application under the planning act is required, and not the favored option.</p>	<p>circumstances, and it is understood that an Air-Insulated Switchgear (AIS) is likely to be progressed by NGET due to their Electricity Act licence obligations in relation to public value for money of upgrading the network. However, until detailed design is further completed, both AIS and GIS are assessed to ensure both options remain available and have been adequately assessed in the ES.</p>
		Biodiversity	<p>The submitted documents on the PINS web site include a BNG calculation but the contents are blank. NSIPS will be required to produce 10% uplift from 2025. Given what is suggested on the solar park itself there could be an opportunity to show a 10% net gain despite the felling of these trees.</p>	<p>The BNG Calculation is available on request but it is not possible to upload Excel documents on the PINS website as they can be manipulated. A minimum of 10% BNG will still be achieved from the Energy Park for the whole of the Proposed Development and this is secured by Requirement 8 of the DCO (document reference 3.1).</p>
		Arboriculture	<p>The submitted information with this email does balance the direct adverse effects of the trees' removal with the proposed orchard planting on the solar park. However, the sites are some</p>	<p>As outlined in the supplementary environmental information submitted with the Change Application, the Applicant's conclusion is that the trees at Bicker Fen Substation are not mitigating the landscape or ecological impact of</p>

			<p>distance apart and the orchard does nothing for this localised impact. It would be welcomed if the loss of the trees could be mitigated for on the substation site.</p> <p>Therefore, Boston Borough Council would prefer the gas insulated option so fewer trees are felled and those that are felled are replanted on the substation to repair the localised harm.</p>	<p>the Substation. In addition, due to land and technical constraints, no further space can be provided for replacement planting at the substation.</p> <p>However, to offer some additional planting (viewed as 'compensatory') the Applicant has included an additional area of tree planting in the north of the Energy Park site, and within the hedgerow proposed on the northern boundary. These will increase the number of new trees associated with the overall scheme, as well as offering additional screening to the single property to the north of the Energy Park, and a cluster of trees which fits the landscape of 'shelter belt' plantations within the flat fenland landscape.</p>
		Cumulative impacts	<p>This amended proposal should also take into consideration the Temple Oaks and Beacon Fen solar farm projects in terms of additional infrastructure that may be required at the sub-station and cumulative impacts this may have.</p>	<p>The cumulative impacts are assessed so far as possible with the information available. The exact dates and locations of the connections at Bicker Fen have not been speculated in this application as it is for those projects to pursue those connections and relevant planning approvals if required. The Applicant will be submitting an Interrelationship Report at Deadline 1.</p>
		Economic impacts	<p>The amendments constitute a further extension within the Borough's area, and so from an economic and social perspective, the Council would like to see the development doing as much as it possibly can to maximise the benefits for local people and businesses for hosting this infrastructure. Such examples could</p>	<p>Unfortunately, as this is a high voltage connection, it is connecting into the transmission network whereby low voltage connections are not available. Those low voltage connections would be managed by the Distribution Network Operator (DNO).</p> <p>An Outline Supply Chain, Employment and Skills Plan is included with the application</p>

			include local 'low voltage' grid upgrades; additional capacity being created within the substation (beyond that to serve the development) to enable further projects to have capacity to connect; options for enhanced skills offerings, particularly in relation to Net-Zero and energy for local people via colleges etc; promotional events and supporting communities to engage with the development during construction and during operation – eg skills fairs, procurement advice; use of social value engines to maximise benefits, and development of other schemes which can create a positive legacy for hosting this sort of infrastructure.	(document reference 7.12 / APP-243) and is secured by Requirement 16 of the DCO (document reference 3.1). It is anticipated that the 36 roles likely required to construct the Additional Works at Bicker Fen will already be workers or contractors employed by National Grid; this is necessary due to the specialist high skilled role and training which is required when working on electricity infrastructure of this nature. However, in relation to the Applicant's works, there is greater ability to influence the local community and skills/supply chain in this context; for example, based on discussions the Applicant has undertaken to date, firms and contractors often have apprenticeships and other opportunities which would be confirmed through submission of the final Supply Chain, Employment and Skills Plan submitted under Requirement 16 of the DCO.
Environment Agency	1 August 2023	Flooding	We note that this risk of fluvial flooding is acknowledged on Page 7 of your Information Leaflet, but it is unclear if/how the submitted Environmental Statement and Flood Risk Assessment will be amended/updated to include details of these additional works within the current Development Consent Order application. We advised that all critical infrastructure required to ensure the continuous running of the site is raised above the 1:1000 plus climate change flood level. This will ensure any equipment required to run the site will remain operational in the event of a flood.	<p>Whilst the National Grid works are likely to form an independent phase of the Project, all phases must comply with the relevant provisions of the outline design principles and the flood risk assessment, as secured by Requirement 6 of the DCO (document reference 3.1).</p> <p>The submitted FRA is framed on the basis that all flood-sensitive infrastructure will remain operational during a 0.1% (1 in 1000 year) plus climate change breach event (as per EA requirements). At para 9.1.5 it states: To facilitate a connection to their transmission system, National Grid has confirmed that it will be necessary to install new equipment at the existing Bicker Fen substation. Although subject</p>

			<p>Providing this mitigation is incorporated into the development we would agree with your assessment of 'no significant effects' in respect of fluvial flood risk for the operational or decommissioning phases related to the Additional Works.</p> <p>Please note that our advice has not considered the risk of flooding from ground water, drainage systems, reservoirs, canals or ordinary watercourses. You will therefore need to consult other relevant flood risk management authorities in respect of flooding from these sources.</p>	<p>to further appraisal and detailed design, the works will make provision for a new generator bay of approximately 55m x 30m x 15m that will enable the Solar Park to connect into the Grid. The substation extension to provide a new generator bay will be delivered by National Grid and all substation works will be designed and constructed fully in accordance with the relevant National Grid design manual/technical specification regarding substation flood resilience/protection.</p> <p>In formulating the final design, National Grid will appoint specialist flood risk consultants to ensure the design is compliant with the above.</p>
Local Residents	5 August 2023	General	<p>Having viewed the relevant documents, I have no objection to the proposed additional works at Bicker Fen. Furthermore, as the climate and energy crisis deepens and accelerates, the need for this development increases by the day. Such is our need - as individuals, as a country, and as organisms inhabiting our warming planet - this important component of renewable energy infrastructure <b>MUST NOT BE DELAYED</b>. Rather, <b><i>the rate of development of this project should be increased.</i></b></p>	<p>The Applicant notes this comment and welcomes the support.</p>
Beacon Fen Energy Park Limited	11 August 2023	General	<p>Beacon Fen Energy Park Limited welcome the opportunity to respond to the targeted consultation, given that the cable routes for the proposed</p>	<p>The Applicant notes this comment and will continue to keep Beacon Fen Energy Park Limited (BFEPL) informed of any project changes. The Applicant is also in discussions</p>

			<p>Beacon Fen Energy Park and Heckington Fen Solar Park are located in proximity to each other, and that both projects would connect to the same substation.</p> <p>The proposed Change Application includes additional works at Bicker Fen substation, which are beyond the current Order Limits for Heckington Fen Solar Park, including a busbar extension and sealing end compound. The proposals for Beacon Fen Energy Park also include a cable connection into Bicker Fen substation with a similar capacity. We intend to include the same work package in our DCO to ensure that whichever project is first to be constructed will have the relevant consent to carry out the works required.</p> <p>We are pleased to have the opportunity to submit a response to this targeted consultation and would like to be informed of any further changes to Heckington Fen Solar Park. We would welcome further engagement opportunities to discuss project interactions to ensure the additional works required at Bicker Fen substation and any other interrelated aspects are fully considered and, if required,</p>	<p>with BFEPL in relation to understanding the proximity and overlap with their proposals in order to identify opportunities for co-ordination between the two projects.</p>
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			constructed at appropriate timescales for both projects.	
North Kesteven District Council	15 August 2023	Arboriculture	<p>The change to the order limits would result in further localised permanent losses of semi natural habitats adjacent to the substation. The time series of aerial imagery available via Google Earth shows these habitats to be of secondary origin and in the order of 18 years of age, originating c. 2005 2007 at the time of construction of the substation.</p> <p>The main additional habitat impact of note is the loss of 4ha of plantation woodland comprised of native tree species (the submitted plans indicate this would be over 50% of the affected woodland). The South East Lincolnshire Local Plan states (paragraph 7.5.11) that there is little woodland in South East Lincolnshire. Therefore, I do not agree with the assessment that the woodland is of local nature conservation value only. Given the scarcity of woodland in the Local Plan area, district/borough value would seem most appropriate in accordance with the method statement in Section 8.3 of Chapter 8 of the Environmental Statement (ES).</p> <p>Local Plan Policy 28 includes a presumption that existing woodland will be protected. If the need for the</p>	<p>Unfortunately, there is no space available at Bicker Fen to incorporate a new area at this time (e.g. planting cannot be placed over underground cables). As such the applicant has included a further area of planting in the Energy Park, in the northwest corner. The new woodland tree planting (approximately 0.42ha) would be planted for the lifetime of the Proposed Development and would increase localised biodiversity value in this area.</p> <p>To confirm, this is 0.4ha of removal and approximately 0.42ha of replacement planting (not 4ha as per the AECOM report). This has been reflected in the BNG calculation also, which will be for the project overall, rather than split into works at Bicker Fen Substation.</p> <p>The 0.4ha of woodland is not a locally designated ecological site, nor is it ancient woodland.</p>

			<p>woodland loss can be demonstrated (after first considering options for impact avoidance and reduction), habitat compensation will be required. It would take a prolonged period of time to re-establish woodland of comparable structure and condition i.e. upwards of 18 years. Further, if the existing woodland was retained it would continue to mature and accrue biodiversity value. So, even after 18 years of growth, the new woodland would not have the same biodiversity value as the existing woodland if it was retained.</p>	
		Biodiversity	<p>I agree that the additional areas of land affected by the order limits change are of relatively low biodiversity value. And also that protected and notable species are not likely to be meaningfully affected. Therefore, I agree that the wider conclusions of the ES remain as previously assessed. I perceive no material impact on the conclusions of the assessment of cumulative effects. If the need for the woodland loss is accepted, then the required level of compensation should be determined by the Biodiversity Net Gain (BNG) assessment. This compensation should preferably be located in close proximity to the woodland loss, given the scarcity of woodland within the affected landscape. New woodland</p>	<p>The BNG assessment has been updated and an additional area of woodland added to the Energy Park as noted above. Prior comments (following submission to feed into the Local Impact Report) have not been updated at this time, as the Change Application documentation only focusses on amendments as a result of the Bicker Fen Substation Change.</p>



			creation should not be at the expense of other habitats of existing biodiversity value. My prior comments in relation to the BNG assessment should be considered when updating the assessment to include the additional habitat losses.	
		Biodiversity	AECOM do not highlight any habitat or cumulative effect having reviewed the Appendix 8.13 supplemental ecology survey however as you've already noted the effects of partial woodland loss will need to be incorporated into a revised BNG assessment but noting that compensation plantings should be in close proximity to the area of woodland loss.	The Applicant notes this comment. Appendix 8.13 – Further Phase I Survey at Bicker Fen Substation was submitted with the Application.
		Archaeology	In relation to archaeological matters I note that the consultation document references Requirement 12 of the draft Development Consent Order and the suggestion of dealing with impacts through the Written Scheme of Archaeological Investigation. NK will address this approach more generally in the LIR along with the current drafting of Requirements separately however in that context we have no further comments regarding the suggestion of adding AW1 and AW2 into the overall scope and coverage of the WSI.	The Applicant notes this comment.
Local Residents; Asgarby and	16 August 2023; 17 August 2023	Arboriculture	The additional works required at National Grid's Bicker Fen Substation to provide a new generation bay and	The Applicant has discussed the possibility of further additional planting at the Bicker Fen Substation with NGET. Unfortunately, due to

Howell Parish Council			<p>connection for your Heckington Fen Solar project will involve expansion of the footprint of the existing Bicker Fen Substation and destruction of existing woodland to accommodate these changes.</p>	<p>land and technical constraints, additional planting at the Bicker Fen Substation is not possible.</p> <p>However, the Applicant's conclusion is that mitigation is not required or feasible to the south of the Bicker Fen Substation; this is primarily due to the limited value the current trees have on screening views from any sensitive visual receptors.</p> <p>Therefore, as 'compensatory replacement' the Applicant has included an additional area of tree planting in the north of the Energy Park site, and within the hedgerow proposed on the northern boundary. These will increase the number of new trees associated with the overall scheme, as well as offering additional screening to the single property to the north of the Energy Park, and a cluster of trees which fits the landscape of 'shelter belt' plantations within the flat fenland landscape.</p> <p>The tree planting proposed within the hedgerows would use species suitable for the area and would be sourced from appropriate suppliers to reduce the risk of pests and diseases.</p> <p>The plantation woodland on the Energy Park and at Bicker Fen are not available for timber production as far as the Applicant is aware. The social benefits of the Community Orchard on the Energy Park will be recognised with access by arrangement to local groups, parish councils</p>
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				and the neighbouring school. The biodiversity impacts will be improved with the addition of hedgerows, and the removal of chemical run off associated with the farming on the Energy Park.
		Agriculture	<p>Whilst you report no loss of agricultural land at the Bicker Fen Substation site, the same cannot be said for the 1 450 acres at Heckington Fen Solar park which we believe will involve large-scale loss of land historically involved in food production.</p> <p>Whilst we support the drive for renewable energy sources and reduction in the carbon footprint, we do not feel it is in the countries or the climates best interests to do this at the expense of independent food security. We realise that consumption of the agricultural landscape may provide a convenient and expedient solution for those responsible for these projects, but we would urge those concerned to seek alternatives that do not impact on vital infrastructure such as food production or have such a radical effect on the environment or the individuals that live in the areas affected. We feel strongly that the use of land that has no impact on food security would be preferable to that which does. Indeed it seems strange that you are not seeking to deploy these developments in areas that would have no effect on an issue as</p>	<p>The Applicant notes that this response is not solely related to the Change Application.</p> <p>In respect of the wider matters surrounding agricultural land, the Applicant refers this consultee to Consultation Report Appendix 18 – Hearing your views, submitted with the Application (document reference 5.1.18).</p> <p>In short, the Applicant notes that the land for the solar park will still be classified as agricultural land. The area underneath and around the panels is proposed to be managed as a nature conservation pasture with sheep grazing.</p> <p>Over 80% of the land is grade 3 land, and suffers the usual constraints of heavy soils, notable blackgrass infestation and a general susceptibility to wetness, both of which constrain farming activities.</p> <p>The Site is used for winter wheat as very little else can be grown. An alternative could be miscanthus which offers no food security.</p> <p>The Project would provide energy storage to help balance supply and demand.</p>

			important as food security. There are alternatives such as 'brown-field' sites or the estimated 600, 000 acres of south-facing industrial roof-space recently described by Dr Caroline Johnson MP which appears to have gone unexplored. Agricultural land currently involved in food production is surely not the only option for solar energy.	
		Cumulative impacts	Not only do these proposals represent further industrialisation of the landscape in rural Lincolnshire. This expansion may increase the capacity of the Bicker Fen Substation to such an extent that Lincolnshire will become subject to even more applications for solar energy installations. This in a county which Alicia Kearns MP describes, along with Leicester and Rutland, as already being subject to over 50% of the currently proposed solar installations in the entire country. Indeed the cumulative effect of the numerous existing schemes and proposals faced by our county give great cause for concern.	The cumulative impacts are assessed so far as possible with the information available. The exact dates and locations of the connections at Bicker Fen have not been speculated in this application as it is for those projects to pursue those connections and relevant planning approvals if required. The Applicant will be submitting an Interrelationship Report at Deadline 1.
		Economic	We are concerned about the effect this industrialisation of our landscape in Lincolnshire will have on our existing economy. We currently have a strong mixed economy worth £16bn per year with agri-food and tourism frequently cited as key sectors within	The Applicant notes that this response is not solely related to the Change Application.  The socio-economic impact of the proposed development is included at Chapter 11 of the ES (document reference 6.1.11 / APP-064) and concludes overall that the socio-economic

			<p>this envelope. Your proposals appear to show little regard for the existing interests of the local economy, the local residents or of the national interest in independent food production. Indeed we are concerned that the loss of productive agricultural land will increase the need to import food into the UK. Food that we no longer produce will surely need to be replaced, presumably by imports. The increased food miles associated with this will create an entirely avoidable carbon footprint. In addition, the cumulative effect of the disproportionate distribution of solar parks within Lincolnshire is unlikely to make the county appealing to the visitors that contribute to a visitor economy currently estimated to be worth over £2.39bn per annum to the Lincolnshire economy, supporting at least 30,000 full time equivalent jobs (pre Covid-19 pandemic).</p>	<p>effects are considered to be beneficial. Continued efforts to address wider benefits for the community will be undertaken separately and outside of the DCO process, and similarly maximisation of employment benefits for local workforce will be established outside of the DCO process via an Outline Supply, Employment and Skills Plan (document Reference 7.12 / APP-243).</p>
		Communities	<p>In addition to our economic and environmental concerns, consumption of large swathes of countryside will also have a negative impact on the landscape and the communities that live within it. The countryside you have selected for transformation into what are effectively industrial installations not only has a distressing effect on the landscape, but also the small communities that live within it. Whilst</p>	<p>The Applicant notes that this response is not solely related to the Change Application.</p> <p>The Proposed Development has been designed to be set back from residential properties in a large-scale landscape. A number of factors influence the final location of infrastructure (such as availability of grid connections, landscape, noise, land use and landownership) – these have been considered in detail in the Environmental Statement. The nearest residents</p>

			<p>the rural communities that have been targeted may be small, the effect of this transformation on the quality of life for the individual residents is nonetheless significant.</p> <p>Although there is conflicting evidence regarding the effect of solar projects on property value, I am aware of evidence that indicates the negative effects are most significant in areas that were previously involved in agriculture. Clearly this will concern homeowners facing the prospect of solar projects in their rural communities.</p> <p>It is on these grounds that we object to the proposed changes.</p>	<p>were offered a meeting with the landscape architect to take pictures from their property during 2022. An updated Chapter 7: Residential Visual Amenity is provided with the Change Application. None of the identified properties assessed in the Residential Visual Amenity chapter have been judged to fail the test of overbearing effects and remain an attractive place to live when judged objectively.</p> <p>The government's public attitude tracker for June 2023 noted 88% of people were supportive of solar energy. Furthermore, 78% wouldn't mind if a solar farm was built in their local area (comprised of 28% very happy; 23% fairly happy and 27% wouldn't mind either way).</p> <p>We have located our solar infrastructure to avoid communities and individual properties as much as possible. House values depend on a number of different factors and it is difficult to single out any one factor that will affect house prices.</p> <p>A recent study of public attitudes to solar development, summarised in a report titled '<a href="#">2023 – a transformative year for Solar</a>', shows that support for solar grows throughout the project lifecycle and is at its highest when solar farms are operational. The study showed those living in the development phase of solar are markedly more hesitant to support solar, with only 17% in strong support. By comparison, once sites are in operation the percentage of those in strong support jumps to 61.5%.</p>
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Historic England	17 August 2023	Archaeology	Thank you for consulting us on the amended detailing to this scheme, we have no further comments to make and refer you the expertise of the County archaeological curators with regards to any additional direct impacts on site.	The Applicant notes this comment.
Local Councillor	17 August 2023	Agriculture	Lincolnshire has a large agricultural economy and, produces around 30% of the nation's food but also has a significant tourism industry and I am concerned that the continued industrialisation of our local landscape with large energy production infrastructure will have a deleterious effect on the landscape character with insufficient mitigation proposals for offsetting (away from the sites) the damage caused.	<p>The Applicant notes this comment and recognises that it is not specific to the Change Application. Tourism locally is considered in Chapter 11: Socio Economics. The landscape impacts are considered in an updated Chapter 6: Landscape and Visual.</p> <p>Effects on landscape character at the construction stage show no significant effects are predicted on the geographical extent of the National Character Area 46: The Fens, of which the Proposed Development is sited in. Moderate, not significant, landscape character effects are predicted to be experienced within the landscape located approximately 500m away from the boundary of the Order Limits. Beyond this distance, the degree of change is expected to diminish to low resulting in minor, thus not significant, effects.</p> <p>Effects on landscape character at the operational stage show the Proposed Development would influence the character of National Character Area 46: The Fens, but is unlikely to alter the pattern, scale, and its other characteristics to any significant degree. Limited localised landscape character effects are noted during operation; however the local landscape is</p>

				<p>considered to have a degree of capacity to accommodate the Proposed Development without any effects upon its large scale character. The National Grid Bicker Fen Substation Extension Works, and the infrastructure in the Additional Works areas, would be read as being part of the existing substation facilities and are considered to be inconsequential in landscape character terms.</p> <p>Mitigation hedgerow planting is proposed along the perimeter of the Energy Park (new and infilling) and is to be maintained between 3-5m depending on location to filter views of nearby visual receptors. The Applicant has discussed the possibility of further additional planting at the Bicker Fen Substation with NGET. Unfortunately, due to land and technical constraints, additional planting at the Bicker Fen Substation is not possible.</p> <p>However, the Applicant's conclusion is that mitigation is not required or feasible to the south of the Bicker Fen Substation; this is primarily due to the limited value the current trees have on screening views from any sensitive visual receptors.</p>
		Cumulative impacts	<p>In your proposals, it states: a new section of NGET infrastructure at the substation comprising a busbar extension including a section breaker, a bus coupler and a feeder circuit on land to the south of Bicker Fen Substation (AW1); and a new cable sealing end compound (CSE) on land</p>	<p>The additional works are triggered by Heckington Fen.</p> <p>The Applicant understands that future projects would still need to consent additional infrastructure (generation bays) at the NGET Bicker Fen Substation, which would be considered on their own merits taking into</p>



			to the west of Bicker Fen Substation (AW2); together known as, the "Additional Works". You do not however state what additional capacity these works will give the Bicker Feb Substation - is the upgrade just sufficient for Heckington Fen, or will it substantially increase the capacity of the sub-station, thus making it a hub for further large scale energy projects in the immediate local area?	account cumulative impacts and the existing infrastructure.
		Arboriculture	Your statement about Ecology and Ornithology is, I believe flawed in that your survey was done in May and does not account for this area being part of a winter roost for large flocks of Starlings. The mitigation proposed for the removal of this woodland area - an Orchard somewhere else does nothing in terms of habitat loss for such wildlife that relies on that woodland/scrub area. I would expect that a like for like re-planting with a minimum 10% net gain would have been proposed close to the site.	Due to technical constraints on site it is not possible to commit to replanting in the area of the Bicker Fen Substation. A net gain in excess of 10% for the whole project will be delivered, as secured by Requirement 8 of the DCO (document reference 3.1).  Starling were considered in the ornithological appendix of the main Environmental Statement (APP-200).
		Communities	With regards your Socio-Economics statement, the proposed expansion at Bicker offers nothing in terms of Community Benefit in an area that is relatively poor and deprived. Local residents are being asked to accept more industrialisation of the local landscape along with the disruption and noise from construction, additional traffic and potential devaluation of	A community benefit fund has been explored, however as this cannot form part of the planning balance it is not discussed further. Benefits associated with the scheme include a permissive path, community orchard with access by arrangement, business rates, construction jobs and jobs during operation (as outlined in the Socio-Economic chapter of the ES (document reference 6.1.11 / APP-064).

			their properties with no perceived benefits such as improvements to the local area, such as improvement of footpaths and the provision of sorely needed cycle paths as well as social enterprises. This comment also applies to the main solar project proposed at Heckington Fen - it is not sufficient just to do the bare minimum!	
Natural England	18 August 2023	Landscape	The proposed additional works to be undertaken at Bicker Fen substation are not within a designated landscape and is unlikely to have significant effects.	The Applicant notes this comment.
		Ecology and Ornithology	Natural England agree that the proposed work will not impact any designated sites. Surveys related to the additional works land have been undertaken and were discussed in the Environmental Statement, this concluded that there would be no significant impacts. Given the survey work that has been done Natural England agree that the additional work is unlikely to have any significant impacts on Ornithology and protected species.	The Applicant notes this comment.
		Agriculture	The Land Use and Agriculture Chapter of the ES concluded that there will be no adverse significant effects. Natural England note that the loss of the land where the additional works will be undertaken was not included in this assessment. As the additional works will not be undertaken under this DCO	The total area of land required for the expansion of the existing Bicker Fen National Grid Substation is 2.7ha. As stated above none of this land has been used for agriculture since 2005 and would not be deemed suitable for arable farming due to the network of cables which run underground through this land to connect existing generation sites into the

			<p>and not separately by NGET the potential impacts must be fully assessed.</p> <p>Natural England note that a walkover survey of the cable route has been undertaken however Natural England advise that where surfaces will be sealed and therefore permanently lost a full soil survey should be undertaken. This information should be used to assess the impacts of the proposal.</p>	<p>existing electrical equipment within Bicker Fen National Grid Substation. As this area of land has not been used for agriculture for nearly 20 years and has considerable below ground electrical cabling, it is reasonable to conclude that this land should be considered to be 'brown field' land. Therefore, no further soil classification survey work has been completed for the land required for the extension to the Bicker Fen National Grid Substation.</p>
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### **5.3 Ongoing engagement**

51. Following the launch of the consultation, the Applicant remained committed to engaging with stakeholders, considering their feedback when developing the proposals and answering queries.
52. This included ongoing discussions about the project, with local residents, statutory consultees and local planning authorities, and developing Statements of Common Ground with stakeholders.

## **6. Conclusion**

53. Within this report, the Applicant has demonstrated how views raised during the Change Consultation process have influenced the development of the Project.
54. The Applicant has considered views raised during the consultation and addressed issues accordingly, in particular additional tree planting at the Energy Park, and within the northern hedgerows. The Applicant has had regard to all relevant responses and has provided responses to feedback.
55. The Applicant considers that the consultation described in this report satisfies the requirements associated with the Change Application process.