

Submission ID: 21710

North Kesteven District Council has already responded to the applicant in relation to the Change Request Application. A copy of the supplemental reply from AECOM ecology on behalf of NKDC along with the covering email are included. Please note that the reference to 4ha of woodland habitat in the AECOM reply should read 0.4ha.

Nick Feltham  
North Kesteven District Council  
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NG34 7EF

4<sup>th</sup> August 2023

**Our Reference** 60468641 Heckingham Fen DCO

Dear Nick

### **Heckington Fen Solar Park DCO – Supplementary Ecology Review**

I have reviewed the implications arising from the proposed minor order limits change in the vicinity of Bicker substation within the borough of Boston. This change 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.

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).

Local Plan Policy 28 includes a presumption that existing woodland will be protected. If the need for the 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.

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 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.

Yours sincerely

David Broughton BSc MSc MPhil CEnv MCIEEM  
Associate Ecologist  
AECOM Limited

## Nick Feltham

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**From:** Nick Feltham  
**Sent:** 15 August 2023 08:15  
**To:** Heckington Fen Solar  
**Cc:** Peter Udy; Marwood, Abbie (BBC); Laura White  
**Subject:** Heckington Fen Solar Parkn EN010123 - Change Notification Consultation  
**Attachments:** Heckington Solar DCO\_AECOM\_04.08.23.pdf

Dear Laura

Thanks for consulting North Kesteven District Council in relation to the Change Notification and works AW1 and AW2 at BFSS. Our primary comments relate to ecological matters as per the attached note from AECOM ecology, and specifically the section noting *"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 creation should not be at the expense of other habitats of existing biodiversity value"*.

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. 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.

I've copied in Peter and Abbie at BBC as they might also wish to comment given that the works fall wholly within BBC area,

Regards  
Nick Feltham