EXQ1	North Kesteven District Council Response
Reference	
Reference GEN.1.10	<ul> <li>APP-175</li> <li>As set out in North Kesteven District Council's LIR, Springwell NSIP solar park (situated in North Kesteven) is noted as an 'unregistered' project as at the December 2022 report finalisation date (as is the Lincolnshire Reservoir NSIP, also in North Kesteven), and neither the Beacon Fen or Fosse Green solar parks are noted given that they were announced in March and May 2023 respectively, and have both subsequently been subject to EIA Scoping decisions issued by the Planning Inspectorate. APP-175 is therefore out of date as it does not reference the Beacon Fen and Fosse Green NSIP proposals. In addition, the One Earth Solar Farm, located partly in West Lindsey District in Lincolnshire has also since been registered as an NSIP project - EN010159. The other registered NSIP solar projects in West Lindsey have all since progressed to varying stages including some in examination.</li> <li>Furthermore, the Lincolnshire Reservoir (project 32 listed in APP-175) has since been registered and assigned NSIP reference numbers WA010003 and WA010004. As set out at ISH2, North Kesteven District Council is currently considering a live planning application referenced 23/1021/FUL for the development of a photovoltaic solar array (49.995MW export capacity) with associated grid corridor works, access improvements and ancillary development at Land South Of Little Hale Drove, Little Hale Fen, Sleaford. This application relates to projects 14/26 as listed in APP-175.</li> <li>Furthermore the Council has also since issued an EIA Screening Request (referenced 23/0460/PREAPP) for the installation of a solar farm comprising ground mounted solar PV panels with an installed capacity of up to 49.99MW including mounting system, associated infrastructure, environmental enhancements and a permanent grid connection hub for a temporary period of 50 years. The site address is 'Land To The East And West Of Mareham Lane, Sleaford'. The site is located approximately 11.8km south west of the centre of the Hec</li></ul>

The ExA is referred to paragraph 25.6 and Table 25.1 of the NKDC LIR for our summary on cumulative effects. With specific reference to document APP-175 the Council agrees that in addition to the Lincolnshire Reservoir and One Earth Solar Farm, NSIP projects 1, 2, 3, 4, 6, 8 (Cottam, Gate Burton, West Burton, Mallard Pass, Temple Oaks and Tillbridge respectively) will have cumulative adverse effects on agricultural land at a regional level. Application 23/1021/FUL has also identified loss of BMV land and whilst documents submitted with EIA screening application 23/0460/PREAPP at Mareham Lane Sleaford state that the site is not BMV land the LPA has not received a copy of the ALC report. Therefore, cumulative agricultural land impacts with this project also cannot be ruled out at this time.

The Council agrees with the conclusions stated in relation to the other NSIP and non-NSIP projects listed in North Kesteven, East Lindsey, South Kesteven and South Holland Districts, and Boston Borough.

## REP1-021

With reference to Table 1.1 'Initial assessment of other projects with potential cumulative effects' and specifically projects 1, 2, 4, 5, 6, 8, 9, 10, 11, 12 and 13 (NSIP schemes) the Council does not agree that cumulative agricultural land/BMV impacts will not be significant. This matter is also raised in the Council's LIR and Written Representation. Consistent with our LIR (Table 25.1) the Council agrees that cumulative impacts of Heckington Fen taken alongside the named solar NSIP projects in Lincolnshire (supplemented now by the One Earth solar project) will be 'neutral' for the other topic areas set out in that table, save for positive socio-economic effects across all named projects. The exception is Beacon Fen energy park where our LIR identifies potential (negative) cumulative effects in relation to BMV land, LVIA, cultural heritage and transport.

Aside from BMV matters, and excepting the Beacon Fen energy park, we agree with the applicant's assessment that cumulative adverse effects from those projects can be discounted due to extensive physical distance from the proposed development and that they do not share any common features.

## **Cumulative Effects with Beacon Fen Energy Park**

With reference to paragraph 3.18, we agree that it is highly likely that the Beacon Fen Energy Park will also use the A17 for construction vehicle routeing. Whether or not cumulative construction traffic movements will have a 'severe impact' (NPPF paragraph 111) after mitigation would be for the Highway Authority to also advise upon however based on the data submitted in relation to Heckington Fen (Table 14.9 – ES Transport and Access chapter) this appears unlikely. Paragraph 7.19 suggests a one percent impact in total vehicles and a 1.6% impact in HGV flow in terms of cumulative considerations.

If construction phase/s do overlap, the Council's view is that it would be possible through the discharge of dDCO Requirement 14 (Construction traffic management plan) to require the respective parties to evidence schedules of agreement in relation to, for instance, the timing of abnormal load movements along the A17 to reduce impacts. Subject to landowner agreement we also agree that in the event works are required at the Bicker Fen substation, the potential construction haulage route could potentially follow the same routing as that of the proposed development. We note the commitments made in paragraph 5.6 of Rep 1-021 in this respect.

We also note paragraph 4.5 which confirms that despite the difference in stages, both applicants for Heckington Fen Solar Park and Beacon Fen Energy Park are open and willing to collaboratively work together to understand project interactions and explore the potential for sharing a cable route connection, including the ability to share survey data for areas of overlap along the Offsite Cable Route Corridor to avoid repetition of survey work.

Whilst the applicant commits to providing further assessment in due course, at this stage (and consistent with our LIR) the Council wishes to highlight potential for cumulative impacts on this historic environment – in relation to both archaeology and above ground assets.

Whilst trial trenching is underway at present, the results of this will be required to inform the archaeological mitigation strategy. An Outline WSI for the cable corridor has been provided informed by the applicant's desk-based assessment and geophysical survey. The purpose of the trenching programme is to examine the cropmarks and geophysical anomalies identified together with areas where other techniques have not identified potential archaeological features.

Given that the results are not yet available to inform the applicant's assessment, and that the Beacon Fen project similarly does not have any information at present in relation to the archaeological baseline along the cable corridor, there are potentially cumulative adverse effects in areas where both projects might overlap and interact.

In terms of above ground heritage assets, we agree that there appears to be no historical or direct visual association between Mill Green Farmhouse and the land proposed for the Beacon Fen site and therefore do not consider there to be cumulative effect with this non-designated heritage asset. Views of Kyme Tower are possible from areas around the north west of Beacon Fen and as such, mindful of the Council's position in relation to the assessment of Kyme Tower in relation to the main energy park site, some cumulative adverse effect cannot be ruled out albeit we accept that no such assessment has yet been provided in relation to the Beacon Fen scheme.

With reference to cumulative LVIA considerations we agree that there is the potential for significant cumulative visual effects to occur during the construction stage of the offsite cable routes if the two NSIP schemes were built out at the same time, as the two offsite cable route corridors overlap. We agree that these effects are likely to be highly localised, short term and temporary.

In terms of cumulative LVIA considerations associated with the construction and operation of the energy park site, Figure 1.3 is very helpful at this stage, confirming that there is the potential that certain visual receptors may be subject to sequential significant visual effects; specifically those areas shaded blue on Figure 1.3 around the north, north-west and west of the Heckington Fen energy park site. At this stage and in the absence of emerging designs for the Beacon Fen proposal the Council could only conclude that some negative operational effects, primarily associated with the energy park site as opposed to the cable corridor works, would occur.

The Council agrees with the Ecology and Ornithology conclusions in relation to the internationally and nationally designated sites, and mindful that there are no LWSs within the energy park site (i.e. within North Kesteven District) we also agree that there would not be any cumulative effect with Beacon Fen in this regard. As the applicant highlights at paragraph 7.12, the expectation is that for developments yet to be granted Development Consent to achieve a minimum of 10% Biodiversity Net Gain within their site design. It is not possible to discern cumulative impacts on species or habitats at this stage.

The Council also agrees that cumulative operational noise and vibration and air quality effects are unlikely to occur associated with the operation of Heckington Fen and Beacon Fen. The Examining Authority should be guided by the Environment Agency and Internal Drainage Board in relation to flood risk and hydrology, however whilst we note that Beacon Fen Energy Park is also located in flood zone 3, it will also be subject to compliance with the relevant national policies and therefore be required to demonstrate that flood risk is not increased, that the surface water drainage regime and surface water quality are not adversely affected, and that groundwater aquifers are not affected.

We agree that cumulative climate change impacts will be positive, and we also agree that on the basis that Heckington Fen energy park has assessed that the most impacted residential properties are observation points OP6, OP35 and OP36 (which will experience a weather-adjusted duration of up to 835 minutes of glint per year (OP36 - Holme House, Littleworth Drove and assuming a 10 degree panel angle), equating to about 0.28% of annual daylight hours potentially affected by glint effects at receptor OP36, that cumulative glint and glare impacts are unlikely. We also note proposed mitigation by boundary landscaping.

With reference to cumulative agricultural land impacts, the proportions of BMV estimated to date at Beacon Fen Energy Park are restricted to those in the EIA Scoping Report; about 149ha of Subgrade 3a. The applicant then sets this figure in the context of 20.2ha of agricultural land being 'sealed over' at Heckington Fen energy park for the purpose of fixed equipment. As set out in our LIR we do not agree that 'sealing over' (i.e. permanent loss) should be the yardstick, although we accept that paragraph 7.38 summarises that cumulatively the proposed development and Beacon Fen Energy Park would lead to a cumulative temporary use of 406.88ha of BMV land used.

	As summarised in our LIR the Council is not yet satisfied that the applicant has proven that the 'need' to develop BMV land has been clearly established (with reference to CLLP policy S67, first bullet point), nor in relation to point 3 that the impacts of the proposal upon ongoing agricultural operations have been minimised through the use of appropriate design solutions. The proposals for sheep grazing are developed only to high level, with the applicant stating only that a contract with a grazier is in place but with no further detail provided. The applicant's suggestion at paragraph 7.37 that instead of 'loss', the granting of the DCO will lead to an alteration in the agricultural practice which will take place on the Energy Park site (from arable to pastoral) has not yet been detailed, and 'without prejudice' discussions in relation to the dDCO Requirement for sheep grazing continue.
	In overall summary of document REP1-021, the Council agrees with the majority of the commentary in relation to cumulative effects however to reiterate with reference to Table 1.1 'Initial assessment of other projects with potential cumulative effects' and specifically projects 1, 2, 4, 5, 6, 8, 9, 10, 11, 12 and 13 (NSIP schemes) the Council does not agree that cumulative agricultural land/BMV impacts will not be significant.
DLV.1.2	Q (i) – On the whole the Council considers that the submitted documents provide enough detail and a sufficient basis to guide detailed design development post consent; in particular PS-138 'Outline Design Principles' which contains a helpful 'design principles' section containing likely spatial parameters for works, buildings and structures. For the purpose of discharging Requirements it would be helpful if these principles could be extracted and cross referenced to the parameters, design and dimensions of the works, buildings and structures in each Work Area to show how the detailed design aligns with the outline parameters including highlighting where there are any divergences.
	Document PS-045 is helpful insofar as it contains images of examples of string and central inverters, 33/66kv and 400kv transformers. Whilst the DCO application is accompanied by series of plans and elevation drawings it would assist if the applicant could provide further images as far as possible of all works, buildings and structures; again for the purpose of assisting with a compare/contrast exercise when detailed designs are submitted.

Q (ii) - As drafted and contained with the dDCO (PS-024), Requirement 6 requires the submission and approval of details relating to (a) the layout; (b) scale; (c) proposed finished ground levels; (d) external appearance; (e) hard surfacing materials; (f) vehicular and pedestrian access, parking and circulation areas; (g) refuse or other storage units, signs and lighting; (h) drainage, water, power and communications cables and pipelines; and (i) programme for landscaping works. The latter has possible overlap with the LEMP (Requirement 8).

The Council does not consider that any additional details need to be added to this list and we have shared comments on the dDCO with the applicant confirming such. With reference to (h), it may be necessary for the applicant to submit typical cross sections of cable and pipeline works relative to features such as roads, railways, watercourses and green infrastructure, however as drafted the wording does not preclude the Councils seeking those details in relation to the applicable Work Areas.

The Councils are likely to need to consult bodies such as Lincolnshire Fire and Rescue, the Internal Drainage Board and the Environment Agency in relation to the detail of elements such as fire safety infrastructure comprising fire suppression systems and storage structures for the purposes of firefighting, and flood protection measures; depending on the Work Area. Whilst R6 binds that the details must accord with the submitted Flood Risk Assessment it might be helpful to expand (c) to also require submission of finished floor levels (as well as ground levels) in relation to Work Areas containing buildings; for example work numbers 2 and 4.

Q (iii) - Whilst North Kesteven District Council does not have an in-house or consultant urban designer we are confident that given the nature of the application we have sufficient skills, experience, expertise and competence to consider design matters post-consent. North Kesteven District Council has determined a number of solar PV energy park developments and are familiar and comfortable with the various elements and components of such developments, further there is also an experience in dealing with large-scale development proposals such as sustainable urban extensions. We do not consider that an external design review is necessary in this context. The Council uses a retained ecological consultancy (AECOM) who, alongside our Tree Officer would be able to provide a sufficiently detailed review of the LEMP insofar as the LEMP is a core component of the detailed design and layout of the site.

DCO.1.1	The Councils have exchanged a document with the applicant setting out the agreed position in relation to which authority is responsible for each of the individual discharge of requirements. A copy is attached at <b>Appendix 1</b> . Please note that this relates solely to discharging authority responsibility and not to the broader wording of the Requirement/s, which are still under review with the applicant.
HE.1.1	<ul> <li>Requirement/s, which are still under review with the applicant.</li> <li>The Council agrees that the following sites should be considered as 'non-designated heritage assets' (NDHA) given that they satisfy the criteria contained on the Council's NDHA checklist (Local List of Non-Designated Heritage Assets   North Kesteven District Council (n-kesteven.gov.uk);</li> <li>Mill Green Farmhouse <ul> <li>Former Primitive Methodist Chapel</li> <li>Rectory</li> <li>The derelict cottages and barn of Six Hundreds Farm</li> <li>Former drainage pump at Head Dike</li> </ul> </li> <li>Due to the extant condition, the following would not be considered as an NDHA: <ul> <li>Low boundary wall at Elm Grange</li> </ul> </li> <li>The five named assets are certainly of some interest, however we consider that the Former Primitive Methodist Chapel and Rectory do not require further assessment, but the farm buildings (cottages and barn) at Six Hundreds Farm and the former drainage pump should probably be subject to some further assessment.</li> <li>However, we are satisfied that on the basis these structures will not be physically impacted by the proposed development, this assessment could be linked with 'archaeological' matters through expanding the dDCO Requirement 12 and requiring a submission of a scheme for historic building recording for these two assets</li> </ul>
	which then can be placed on the Historic Environment Record as supplemental to existing entries. We do not consider that any additional pre-determination assessment of these assets in the context of impacts arising and significance (NPPF paragraph 203 and CLLP policy S57) is necessary.

HE.1.2	With reference to impacts on Kyme Tower, the Council's principle concern lies with the following description of the setting of the tower in paragraph 6.59 of the Environmental Statement (Volume 3: Technical Appendices Appendix 10.1: Heritage Desk Based Assessment DBA) (APP-206);
	"The long-ranging intervisibility of Kyme Tower and parts of the Energy Park is largely incidental to the significance of the asset; there is no evidence to suggest that visibility specifically of the Energy Park was ever important to the defensive function of the Tower, or that the Tower was intended to be seen specifically from the Energy Park or any location to its south or south-east from where the Energy Park may be co-visible".
	As a fortified tower there should not be an expectation that the tower was designed as part of a wider designed landscape. The tower was constructed to be both conspicuous in the landscape and functionally offering a 360-degree defensive view away from the tower. The principal of aligning its significance within a designed view/designed landscape would be to imply that it was a folly type structure, which is not the case. These views and the surrounding landscape add significance to the setting of the heritage asset. The application site falls within these views.
	Due to the historic function of the tower and the extant landscape setting, no views of the tower, or away from the tower, should be classed as "incidental". The fact that the tower is visible from the application site demonstrates the fact that Kyme Tower was designed to be a physical presence in the landscape.
	The application site would be visible and present within views away from the tower, thereby affecting the landscape character of the site, though this is yet to be properly assessed through the application. This would affect the setting of the tower, thereby having a degree of 'less than substantial harm' on its special interest. The impact of monumental architecture in the landscape is further exemplified by views of numerous church towers and spires located outside the study area, which are still clearly visible from the application site.
	As such the Council disagrees with the conclusion in paragraph 10.5.22 of APP-063 that the effect on Kyme Tower is "not significant" and that no harm is caused. In our view, we believe that the impact has yet to be fully assessed, however we accept that the harm lies towards the lower end of 'less than substantial' (engaging NPPF paragraph 202) however that the required counterbalance of public benefit would be met.

PPL.1.3	Q (i) – A copy of all relevant Development Plan policies referred to in the Council's LIR is attached at Appendix
	2.
	Q (ii) – There are no SPDs that are of relevance to these proposals within North Kesteven District, however the Central Lincolnshire authorities have produced a series of guidance notes and checklists in relation to delivery of Biodiversity Net Gain (CLLP policy S61) and Energy Efficient Design (CLLP policy S8). The latter will be applicable to works such as monitoring and control buildings with sources of electricity supply and heating for example those used by personnel. Copies are attached as <b>Appendix 3</b> . Other North Kesteven strategies and guidance applicable to these proposals are set out in section 9 of our LIR.
	Q (iii) – There are no made or emerging neighbourhood plans applicable to these proposals within North Kesteven District. South Kyme parish has held initial discussions with the Council regarding neighbourhood planning however this has not advanced to date.
	Q (iv) – North Kesteven District Council considers that Section 4 'Planning Policy Context' of Statement of Need and Planning Statement [PS-142] is comprehensive save for the below observations.
	The applicant summarises the position contained within the emerging NPSs in relation to a number of matters including the use of best and most versatile land (BMV). Paragraph 4.30 of Section 4 references part of this guidance (as contained in draft EN-3) however it does not quote the preceding paragraph in that guidance, as follows:
	"3.10.14 While land type should not be a predominating factor in determining the suitability of the site location applicants should, where possible, utilise previously developed land, brownfield land, contaminated land and industrial land. Where the proposed use of any agricultural land has been shown to be necessary, poorer quality land should be preferred to higher quality land (avoiding the use of "Best and Most Versatile" agricultural land where possible)" (draft EN-3, 2023 version)

The NPPF (2021) is summarised in paragraphs 4.39 onwards, however the NPPF has since been replaced by the September 2023 version. The applicant refers to a number of NPPF paragraphs however Chapter 15 'Conserving and enhancing the natural environment', paragraph 174 is not summarised. This paragraph notes that planning policies and decisions should contribute to and enhance the natural and local environment by, inter alia '(b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland'.

At paragraph 4.51 the applicant references Central Lincolnshire Local Plan Policy S5, Part F 'Agricultural Diversification'. The Council has not listed S5 as an applicable policy in our LIR. The preface to this policy does not give examples of types of 'agricultural diversification', however it does note at CLLP paragraph 2.5.3 that:

"Development needed to directly support such uses is important to foster a successful rural economy, but it can also have an impact on the landscape if not properly managed. As such it is important that such development is located and designed appropriately to minimise adverse impacts or even benefit the countryside".

The 15<sup>th</sup> December 2022 'National Statistics – Chapter 5: Diversification' document (<u>Chapter 5: Diversification - GOV.UK (www.gov.uk</u>) confirms that solar energy is the second most common form of diversified activity, and has increased by 21% over a 10 year period. However, in the context of CLLP policy S5 Part F, the applicant has not expressly set out how the scale of the proposed solar energy scheme in this case is 'appropriate to the business need.' Furthermore, whilst we accept that the December 2022 document refers to the increased popularity of solar energy in the agricultural context, solar energy proposals are not expressly envisaged in the operation of CLLP policy S5, which is why the Council has not previously referred to it as an applicable policy.

In addition the Council has referenced CLLP policy S10 'Circular Economy', S11 'Embodied Carbon', S28 'Spatial Strategy for Employment', S49 'Accessibility and Transport', S50 'Community Facilities', S54 'Health and Wellbeing', S66 'Trees, Woodland and Hedgerows', S67 'Best and Most Versatile Agricultural Land' and S84 'Ministry of Defence Establishments' in our LIR however these are not referred to in the PS-142 policy section. In that context we do not consider that PS-142 is comprehensive insofar as these policies are all applicable to a greater or lesser degree to the proposals.

	Finally with reference to paragraph 4.71 we note that the 'Renewable and low carbon energy' section of the NPPG was updated on 14 August 2023 with specific guidance dealing with BESS schemes.
SET.1.2	Q (i) – The Outline Supply Chain, Employment and Skills Plan is perhaps unsurprisingly at this stage a brief document containing limited detail about how the applicant will engage on these matters post- decision. We note that an updated version will be required in the discharge of Requirement 16; the method of discharge of which is yet to be confirmed. Given that there are likely to be financial elements to this discharge of this document (potentially funding of apprenticeships and educational/higher education placements) a s106 Agreement might be required. We will continue to engage with the applicant on this matter.
	Turning to the content of the Outline Supply Chain, Employment and Skills Plan, as a general observation it sets out basic actions but then does not follow up on any real detail of how these actions with be implemented and overseen. The first thing to note about this project will take around 30 months to construct; this is important to note since most projects last less time than this which means they cannot deliver apprenticeships, but at 30 months duration there is no reason why the main contractor cannot deliver apprenticeships in full.
	In addition, point 1 of the 'Objectives' states "Use of local labour where commercially viable and available". We are concerned that this provides an opportunity for the applicant to avoid the use of local labour and we are unclear what the implication of 'commercially viable' is. The applicant should instead commit to using local labour 'where possible'.
	Turning to the sub-headings in the document:
	1. Local Labour – the information given here is rather light on detail. Although the applicant refers to a careers type event being held locally in advance of the main construction starting on site, additional content could be provided. The applicant needs to explain how they will ensure that job seekers are aware of what types of employment opportunities and careers are available as a result of the development, not just in the construction phase but also what long term permanent career opportunities may exist. We would expect that further detail on what the careers event will look like, where is the best place to hold it, how will it be promoted etc, could all be provided as additional detail at this stage.

The applicant states that interested parties can contact them, but is this a message that is already being promoted? If so, we would expect the document to set out how and where. As drafted the suggestion seems to be that the applicant might rely on reactive approaches and expressions of interest from the local labour market rather than proactively and progressively seeking to advertise those opportunities more widely. In terms of the public and private sector organisations noted in Table 1 we consider that this is not ambitious enough. For example Lincoln College could be added to the list along with Secondaries and Academies in the Sleaford area (such as Carres Grammar, Kesteven and Sleaford High School, St Georges Academy) in terms of potential vocational opportunities.

- 2. Supporting local services whilst the applicant refers to local supply opportunities and state they are talking to local contractors, again no real detail of how this will operate in an open and fair way. An obvious opportunity here would be to have a contractors/suppliers exhibition whereby local contractors are invited to attend a conference to understand what the supply chain opportunities are and also what contractors opportunities they are, hosted by Ecotricity and their main contractor. As part of this they could engage with such organisations as the Federation of Small Businesses and the local Chamber of Commerce to identify potential businesses that could benefit. The opportunities need to be clearly promoted in an open and fair way, and the applicant needs to be clear on what the timescale for such opportunities are.
- 3. Recruitment and Training opportunities much of the above is also relevant here. The applicant should effectively consider hosting some kind of jobs fair that highlights what the employment opportunities are for this development. As above the applicant should engage with local colleges, especially Grantham, Lincoln and Boston about how they can work with the colleges to provide dedicated training programmes for young people looking to enter into the job market, particularly in the renewables sector. If they provide the colleges with funding, they can tailor training programmes to the main contractors needs.

We are concerned that the applicant's reference to their experience to date being that apprentices are already likely to be in placements with firms who offer construction services suggests that the applicant will not look towards funding more niche apprenticeships or university placements tailored to the renewables sector. For example, the University of Lincoln currently offers an MSc in Energy Materials and Battery Science (see Energy Materials and Battery Science | MSc | University of Lincoln) with a focus on emerging technologies in the battery sector. It also offers a BSc in Ecology and Conservation. There are multiple UK Universities offering courses in renewable energy engineering.

- 4. Support for Development of Skills Locally as above we support the general approach however detail is limited. An obvious opportunity here would be to have a contractors/suppliers exhibition whereby local contractors are invited to attend a conference to understand what the supply chain opportunities are and also what contractors opportunities they are, hosted by Ecotricity and their main contractor. The applicant should detail which specific local skills they are seeking to develop and then market those opportunities.
- 5. Monitoring and Evaluation as set out above, 'Table 2- Supply chain, employment and skills opportunities' is relatively limited in detail at this stage, mindful of the outline nature of the document. Whilst the 'Employment and Skills' column references communicating requirements for supply chain with local providers, it also promotes 'engaging with suppliers already known to the applicant' to highlight and understand gaps in provision of supplies and personnel. We accept that specialist teams may be brought in for technology-specific works packages (it might be helpful to identify these early) our view is that the starting point should be to prioritise local suppliers and labour (outwith any technology-specific works packages) and only then to engage suppliers etc known to the applicant.

Finally, a significant omission at this stage is how these commitments, and the additionality recommended above by the Council, will be funded. By way of recent precedent, Longfield Solar Energy Limited (LSE) have entered into a Community Benefit Agreement (CBA) with Essex County Council to provide £2.1 million in education, supply chain, skills and employment funding across the lifetime of the Longfield scheme, with training and apprenticeships in the renewables sector receiving £50,000 a year.

The applicant has not entered into detailed discussions with the Council, nor (as far as we are aware) other host authorities in relation to the required community benefits package, and as set out above it remains unresolved how the detail of draft Requirement 16 will be discharged. It seems very likely that certain elements (training, apprenticeships and higher education placements) will need to be addressed either by s106 Agreement or CBA. We would therefore encourage the applicant to provide further detail on this matter at the earliest opportunity (accepting that CBA discussions are to a degree detached from the PA2008 process), and mindful that the Longfield NSIP project is both recent and identical in export capacity (400MW) to Heckington Fen we would anticipate that the overall value of the training, apprenticeships and higher education placement is comparable.
Q (ii) – We can confirm that the Council would be able to liaise with the relevant educational institutions in order to discharge Requirement 16 of the dDCO, subject to the above comments in relation to Q (i).
Q (iii) – At present the Council is not aware of any current initiatives in place regarding promotion of related careers in renewable energy in the area/Lincolnshire. However as above the University of Lincoln currently offers an MSc in Energy Materials and Battery Science (see <u>Energy Materials and Battery Science   MSc  </u> <u>University of Lincoln</u> ) with a focus on emerging technologies in the battery sector and there are other regional universities offering courses in renewable energy engineering.

## List of Appendices

Appendix Reference	Description
Appendix 1	Confirmation of Discharging Authority
Appendix 2	Schedule of applicable Central Lincolnshire Local Plan policies
Appendix 3	Central Lincolnshire Local Plan guidance notes – Energy Statements and Biodiversity Net Gain