

Heckington Fen Solar Park

EN010123

Statement of Common Ground with Boston Borough Council, North Kesteven District Council and Lincolnshire County Council

Applicant: Ecotricity (Heck Fen Solar) Limited

Document Reference: 7.6a

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

Deadline 2: 7th November 2023

Document Revision: 2

November 2023

Track Changes



STATEMENT OF COMMON GROUND

Document Properties		
Regulation Reference	Regulation 5(2)(q)	
Planning Inspectorate Scheme Reference	EN010123	
Application Document Reference	7.6a	
Title	Statement of Common Ground	
Prepared By	Heckington Fen Energy Park Project Team North Kesteven District Council Lincolnshire County Council Boston Borough Council	
Version History		
Version	Date	Version Status
Rev 1	February 2023	Draft for Application Submission
Rev 2	September 2023	Deadline 1
Rev 3	November 2023	Deadline 2

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INTRODUCTION

- 1.1 This Statement of Common Ground (SoCG) has been prepared by Ecotricity (Heck Fen Solar) Limited ("the Applicant") in conjunction with North Kesteven District Council ("NKDC"); Lincolnshire County Council ("LCC"); and Boston Borough Council ("BBC").
- 1.2 The proposed development comprises the construction, operation (including maintenance), and decommissioning of a ground mounted solar photovoltaic (PV) electricity generation and energy storage facility (hereafter referred to as "the Energy Park"), cable route to, and above and below ground works at, the National Grid Bicker Fen Substation (hereafter referred to as "the Proposed Development" (inclusive of Energy Park)) on land at Six Hundreds Farm, Six Hundreds Drove, East Heckington, Sleaford, Lincolnshire.
- 1.3 In the table below of this SoCG:
- "Agreed" or "No comment" indicates where the issue has been resolved or the parties have no comment,
 - "Not Agreed" indicates a final position of the parties that is not agreed, and
 - "Under discussion" indicates where these points are the subject of on-going discussion wherever possible to resolve, or refine, the extent of disagreement between the parties.
- 1.4 It can be taken that any matters not specifically referred to in this SoCG are not of material interest or relevance and therefore have not been considered further. It is recognised however that engagement between all parties will need to continue due to their joint interest in matters arising from the Proposed Development.
- 1.5 The purpose of the SoCG is to identify the areas where the principal parties do not agree and remain in dispute. This will allow the Examination to focus on the most pertinent issues.

The Proposed Development

- 1.6 It is agreed that the proposed development is for a temporary use of land only which will be in place for a period of 40 years from the date of the commencement of electricity generation.

Development Consent Order

- 1.7 It is agreed that North Kesteven District Council and Boston Borough Council will act as a relevant planning authority in relation to the discharging of the requirements of the DCO applicable to their administrative area and LPA boundary. Where the expertise of LCC is required then the County Council will either be the discharging authority or subject to consultation during the approval process, or vice versa as appropriate.

Planning Policy Context

- 1.8 It is agreed that the development plan applicable to the development proposal comprises:
- The Central Lincolnshire Local Plan 2018 - 2040, adopted 13 April 2023
 - South East Lincolnshire Local Plan 2011 – 2036, adopted 8 March 2019
- 1.9 It is agreed that the Central Lincolnshire Local Plan 2018 - 2040 replaces in full The Central Lincolnshire Local Plan 2012 - 2036 (April 2017).

Planning History

- 1.10 The planning history related to the Energy Park and relevant to the proposed development is included at Table 1.

Table 1 – Planning history of renewable projects

	Description of Development	Decision	Date
09/0628/FUL	Installation of a 70m high wind monitoring mast for a temporary period of 18 months	Approved	15 October 2009
09/1067/S36	Application (submitted under section 36 of the Electricity Act 1989) for consent to construct and operate a wind energy electricity generating station	Local Authority objected to the proposal. Application approved subject to conditions – February 2013	08 February 2012
15/0416/S36	S.36C of the Electricity Act 1989 and S. 90(2ZA) of the Town and Country Planning Act 1990. Application to vary S. 36 consent and deemed permission for the Heckington Fen Wind Park, Heckington Fen, near East Heckington.	Local Authority had no objection to the proposal but expressed concerns regarding landscape impacts and proposed re-wording of the RMS condition. Local Authority raised concerns regarding differing noise reports from applicant and objectors and proposed re-wording of the RMS condition. Application not being progressed – confirmed November 2022*	05 June 2015* 24 January 2017
18/1384/S36	S.36C of the Electricity Act 1989 and S. 90(2ZA) of the Town and Country Planning Act 1990. Application to vary S. 36 consent and deemed planning permission for the Heckington Fen Wind Park, Heckington Fen, near East Heckington to allow for the date by which development must be commenced from 5 years to 10 years.	Local Authority raised significant concerns to the proposal. Application refused – July 2022	06 December 2018
*Although no formal decision has been issued by BEIS on the 2015 application, they (BEIS) have advised that they do not intend to			

	Description of Development	Decision	Date
	consider the 2015 Variation application further. The Applicant have therefore not assessed the wind turbine permission as part of the baseline for Environmental Statement. NKDC's position is that the wind turbine application (09/1067/S36) has expired and is incapable of being implemented.		

Impacts of the development

- 1.11 It is agreed that all environmental constraints and sensitive receptors relevant to the determination of the application have been considered in the application plans and documents.
- 1.12 It is agreed that the development proposed is an EIA development, and the submitted EIA assesses the realistic worst-case effects of the development.
- 1.13 The parties agree that, with the exception of the impacts listed under Table 2 (Matters to be agreed), the proposal includes mitigation measures that are capable of reasonably and satisfactorily address all other substantive impacts of the proposal necessary to make the development acceptable in planning terms.
- 1.14 Notwithstanding the fact that mitigation measures to address the impacts listed in Section 2 are yet to be agreed, it is agreed that these outstanding matters are capable of being addressed through the DCO Requirements, subject to ongoing review by NKDC, BBC and LCC, and its advisors (including legal).

Requirements

- 1.15 It is agreed that the DCO requirements will be necessary to address the following matters (further amendments may come forward following discussions with legal representatives and during the Examination):

2. *Commencement of the authorised development*
3. *Phasing the authorised development and date of final commissioning*
4. *Requirement for written approval*
5. *Approved details and amendments to them*
6. *Detailed design approval*
7. *Fire safety management*
8. *Landscape ecological management plan*
9. *Implementation and maintenance of landscaping*
10. *Fencing and other means of enclosure*
11. *Surface and foul water drainage*
12. *Archaeology*
13. *Construction environmental management plan*
14. *Construction traffic management plan*
15. *Operational noise*
16. *Supply chain, employment and skills*

17. Permissive path

[18. Decommissioning and restoration](#)

[19. Operational Environmental Management Plan](#)

[20. Soil Management Plan](#)

[18-21. Community Orchard](#)

1.16 A draft schedule of DCO Requirements is to be considered as part of the Examination (doc. ref. 3.1, AS-007).

Summary of main issues not agreed

1.17 Based on engagement to date and subject to review of the ES and other documentation, common ground may not be possible to fully resolve in particular in relation to the following elements (or sections within these):

- Land use and agriculture – NKDC, including cumulative effects with other NSIP solar proposals across Lincolnshire
- Cultural heritage (archaeology) – NKDC, LCC, and BBC
- Cultural heritage (South Kyme Tower) - NKDC
- Biodiversity assessment including botanical surveys (timings and survey effort), impact pathway assessment for birds, and loss of nesting habitat and the verification of BNG estimates - NKDC
- Biodiversity linkage between Bicker Fen Substation and the Energy Park - BBC

Table 2 - Matters to be agreed

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
1. Biodiversity, Ecology and the Natural Environment					
1.1 Agreed / No comment	Implications for statutory and locally protected habitats sites	Implications are detailed in the Chapter 8, with various mitigation measures summarised. No residual impacts deemed significant.	Defer to other parties with expertise, notably Natural England, North Kesteven District Council's ecological advisors and Lincolnshire Wildlife Trust.	It is agreed that impacts on statutory and local sites have been adequately assessed. AECOM offer no comments in relation to HRA generally, noting that the assessment of wintering birds is appropriate provided that Natural England agrees with the findings of the HRA report.	Defer to other parties with expertise, notably Natural England, North Kesteven District Council's ecological advisors and Lincolnshire Wildlife Trust. No comment.
1.2 Under Discussion	Appropriateness of habitat surveys	Considered appropriate. Quail was a target species at Heckington - so every survey commenced at dawn and every survey commenced with very careful listening right across the open agricultural landscape	Defer to other parties with expertise, notably Natural England, North Kesteven District Council's ecological advisors and Lincolnshire Wildlife Trust.	Not agreed, in particular in relation to quail, terrestrial habitats (see below) and botanical surveys, as the survey did not cover the period at dusk specified for surveys for quail.	Defer to other parties with expertise, notably Natural England, North Kesteven District Council's ecological advisors and Lincolnshire

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		<p>for prolonged periods for Quail. 'Intensive searching' is therefore considered to have been undertaken for this species. More importantly, pragmatic mitigation was outlined at para 8.5.10 of Appendix 8.10 for appropriate future surveys to be undertaken (at dawn and dusk) specifically for this species immediately prior to development.</p> <p>Although good practice survey methods recommend dusk surveys for Quail, Quail actually sing just as frequently and loudly at dawn. In order to reasonably and sensibly streamline time and cost efficiencies, and</p>			<p>Wildlife Trust No comment.</p>

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		especially given the known problems with the species outlined at para 8.2.9 of Appendix 8.10, dawn surveys for Quail were therefore deliberately combined with the early morning surveys for all other bird species.			
1.3 Under Discussion	Effects on specific species and their habitats, including European protected species (EPS)	<p>Bats are the only EPS found on site, no impacts on bat roosts, enhancement of foraging habitat, potential impact of lighting is mitigated for.</p> <p><u>Badger</u></p> <p><u>The Applicant is in the process of composing a draft badger licence and is liaising with Natural England in order to secure a Letter of No</u></p>	Defer to other parties with expertise, notably Natural England, North Kesteven District Council's ecological advisors and Lincolnshire Wildlife Trust.	<p>Not agreed, in particular in relation to badger.</p> <p>As set out in the NKDC LIR, AECOM raise some concerns in relation to the timing of botanical surveys, specifically the timing and survey effort and in particular the suitability of surveying for occurrences of scarce arable flora.</p> <p>AECOM also raise some concerns regarding assessment of birds which is rather high</p>	<p><u>Defer to other parties with expertise, notably Natural England, North Kesteven District Council's ecological advisors and Lincolnshire Wildlife Trust.</u></p> <p>No comment.</p>

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		<p><u>Impediment should badger licencing be required. During this process existing badger survey data will be reviewed by Natural England and the Applicant will further refine mitigation measures, including the siting of badger gates within fencing, if necessary.</u></p> <p><u>It is considered that Badgers have only recently colonised the Energy Park site and, whilst it is recognised that two clans are present, these clans are still in the process of establishing their territories (reflected in the fluctuating occupancy levels of outlier sets).</u></p> <p><u>Whilst no further survey is proposed</u></p>		<p><u>level. (including impact on and t</u></p> <p><u>The need for further information on badger and deer gates in relation to security fencing.</u></p> <p><u>Details of the timings and arrangements of proposed sheep grazing is also needed, due to use of pasture by ground nesting birds.</u></p>	

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		<p>during the examination process, pre-commencement surveys will be undertaken and secured appropriately through the granting of the DCO.</p> <p>A further survey of badgers would be undertaken prior to construction with numbers and precise locations of badger gates determined during the composition of the badger licence utilising any data from pre-commencement badger surveys.</p> <p>Security fencing would be high enough to exclude deer from within the solar arrays areas, but the ditch and grassland</p>			

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		<p>buffers throughout the site are being provided at such a scale that the landscape would remain permeable enough for deer to move through the landscape - ensuring local deer hadpopulations have continued access to grassland margin habitats, and wereare able to move seasonally through the landscape. With no —and weren't— at risk of being enclosed within solar array areas.</p> <p>Botanical Surveys (Arable Field Margins)</p> <p>Survey Approach: Methodology</p> <p>A Preliminary</p>			

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		<p>Ecological Appraisal (PEA) of the site (RSK, 2022), was undertaken in April 2022. This identified areas of arable margin that required further botanical survey.</p> <p>NVC survey methods were not used when undertaking arable plant surveys. Arable Plant surveys followed methodologies derived from Criterion B of the Plantlife 'Important Arable Plant Areas' (IAPA) methodology (Plantlife, 2015). This approach is set out in Section 2.3 of Appendix 8.6 (particularly paras 2.3.4, 2.3.5 and 2.3.6 and Tables 2 and 3).</p> <p>Therefore, concerns</p>			

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		<p>regarding the use of National Vegetation Classification (NVC) Survey methods appear to be based on a misinterpretation of the methodologies set out in section 2.0 of Appendix 8.6.</p> <p>As such the Applicant is not proposing to undertake further survey work.</p> <p>Survey Approach: Survey Timing</p> <p>Fifteen areas were selected for detailed arable survey and botanical surveys were undertaken on 9th, 10th, 11th and 12th May 2022.</p> <p>Whilst the Applicant acknowledges that surveys occurred in May only. Surveys were undertaken by a</p>			

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		<p>botanical surveyor who holds a FISC Level 6 survey accreditation with specialisms in arable flora. FISC level 6 surveyors are recorders/field surveyors with a national status, who are likely to be commissioned to survey particular plant groups at the national level (BSBI 2023).</p> <p>Surveys recorded a total of 91 species of which only four were listed on the IAPA list of conservation concern: Green Field-speedwell (<i>Veronica agrestis</i>), Smooth Tare (<i>Ervum tetraspermum</i>), Small-flowered Crane's-bill (<i>Geranium pusillum</i>).</p>			

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		<p>and <u>Wild Radish</u> (<u>Raphanus raphanistrum</u> ssp. <u>raphanistrum</u>). These species were species of local concern with IAPA scores of 1-2 only.</p> <p>Of the 15 arable plots surveyed:</p> <ul style="list-style-type: none"> • <u>4 plots scored 3 marks</u> • <u>2 plots scored 2 marks</u> • <u>1 plot scored 1 mark, and</u> • <u>8 plots contained no species listed on the IAPA list.</u> <p>Section 2.5 of Appendix 8.6 sets out how May is an acceptable month for the survey of arable vegetation communities,</p>			

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		<p><u>acknowledging that, whilst arable sites may lack certain late-flowering members of families such as Amaranthaceae and Polygonaceae at this time, the value of an arable plant assemblage can still be assessed by the presence of other species, (with most species present at that time in a vegetative state at least).</u></p> <p><u>Para 4.1.7 clarifies this further, explaining that whilst surveys later in the flowering season may have added one or two more species to the list, this would not be enough to raise the score above the fifteen points</u></p>			

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		<p><u>necessary for a site to achieve 'County' level importance within the IAPA framework.</u></p> <p><u>As such the Applicant is not proposing to undertake further survey work, or to update existing reporting due to the timing of the surveys undertaken.</u></p> <p><u>Impacts upon ground nesting birds</u></p> <p><u>The Applicant has given further consideration to the impact pathways upon breeding birds. In particular the impacts arising through potential loss of breeding habitat to ground nesting birds (including skylark and yellow wagtail). A</u></p>			

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		<p>revised cumulative assessment has been provided at Deadline 2 (ExA.ESTN-Cumulative-D2.V1).</p> <p>Grazing</p> <p>The Applicant has submitted an oLEMP (document reference 7.8), part of which details current progress with securing grazing at the Energy Park site. Both stocking levels and grazing rotation patterns will be designed to maximise floral diversity, pollinator resource and opportunities for ground nesting birds. At the request of the RPAs, the Applicant has also agreed to include an additional requirement and control plan for an</p>			

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		<p>Operational Environmental Management Plan (OEMP), secured through Requirement 19 of the DCO. Requirement 19(2) of the DCO states that the OEMP must include details of how sheep grazing will be managed and maintained throughout the operation of the development. Sheep grazing is therefore clearly secured through both the oLEMP and oOEMP.</p>			
1.4 Under Discussion	Effects on trees and hedgerows	The overall scheme offers a significant improvement for trees and hedgerows. Some minor interferences in relation to the grid route and connection	Subject to LIR confirmation, this issue is under discussion.	No comment other than to highlight that the Oak within Group G39 will need to be re-assessed for 'veteran tree' status and that stand-off distances/root protection zones might need to be	Removal of trees at Bicker Fen Substation is unfortunate. Where opportunities to connect the main Energy

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		<p>but the overall biodiversity net gain is positive and exceeds the 10% requirement.</p> <p>Further survey effort of the veteran tree can be undertaken once the land access is agreed.</p> <p><u>If further planting around Bicker Fen Substation does not come forward, then the Applicant will pursue a contribution to a planting scheme elected in conjunction with Boston Borough Council.</u></p>		adjusted.	<p>Park site with Bicker Fen Substation ecologically is possible this should be explored and implemented.</p> <p><u>As an alternative, an appropriate contribution to a planting scheme within the Borough may be appropriate.</u></p>
1.5 Under Discussion	Habitat creation, enhancement and application of Net Gain	Positive with hedgerow and woodland creation, enhancement of existing features and application of Net Gain showing	Subject to LIR confirmation, this issue is under discussion.	AECOM note that the level of detail is sufficient to understand what is being offered in broad terms, but it does not represent a full specification suitable to	No additional comment further to the above.

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		<p>significant improvement on current intensive arable landscape which will become grassland.</p> <p>Requirement 8 of the DCO sets out how a minimum of 60% biodiversity net gain in habitat units, calculated using The Biodiversity Metric 4.0, will be secured during the operation of the whole of the authorised development.</p> <p>Further information on the Biodiversity Net Gain calculations will be considered for at the next appropriate deadline.</p>		<p>set terms of reference for agreement of the detailed plan later as a Requirement. Whilst the quantum of BNG to be achieved is likely to over 10%, it cannot be agreed until sufficient information has been provided to verify the Applicant's BNG calculations. Amongst other things, grassland provision might have been overstated, the gains associated with 'over-sowing' of existing grassland headlands are challenged, the balance between new hedgerow creation and the gapping up of existing hedgerows is unclear, and the condition scores for the baseline and proposed habitats are not fully provided; including the 'Strategic Significance' weighting associated</p>	

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				with some areas of ditch which are mapped as ‘green infrastructure’.	
2. Compulsory Acquisition					
2.1 Under Discussion	Whether the full extent of the land, rights and powers that are sought to be compulsorily acquired, including access for maintenance, temporary possession, powers to override easements and rights under streets, are necessary to facilitate or are incidental to the Proposed Development	There is no freehold acquisition sought in the DCO. An agreement has been reached with the landowner of the Energy Park. The remaining powers sought are in relation to the acquisition of new rights and/or temporary possession which is proportionate and necessary to facilitate the Proposed Development.	LCC is a landowner for the Highways network and also on the grid route. Discussions remain ongoing with landowner’s agents.	No comment.	No comment.
2.2 Under Discussion	The Statement of Reasons and whether the powers sought are required for the development to which the order relates,	Legitimate, necessary, and proportionate for delivery of a Nationally Significant Infrastructure Project.	LCC is a landowner for the Highways network and also on the grid route. Discussions remain ongoing with	No comment.	No comment.

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	whether they are legitimate, necessary, and proportionate and whether it is clear how the Applicant intends to use the land	Clarity can be provided if unclear.	landowner's agents.		
2.3 Under Discussion	Whether there is a compelling case in the public interest for the compulsory acquisition of the land, rights and powers that are sought by the dDCO that justifies interference with the human rights of those affected	There is no freehold acquisition sought in the DCO. An agreement has been reached with the landowner of the Energy Park. The remaining powers sought are in relation to the acquisition of new rights and/or temporary possession which is proportionate and necessary to facilitate the Proposed Development. Negotiations continue with landowners to ascertain the rights being sought are appropriate and to secure private	LCC is a landowner for the Highways network and also on the grid route. Discussions remain ongoing with landowner's agents.	No comment.	No comment.

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		agreements.			
2.4 Under Discussion	Whether the temporary possession powers sought are needed to enable the construction, operation, or decommissioning of the Proposed Development; the total period for which the land may be subject to temporary possession; and whether the powers sought are compatible with human rights tests	The temporary possession powers are appropriate, and in line with precedent, for a Nationally Significant Infrastructure Project (NSIP) of this nature.	LCC is a landowner for the Highways network and also on the grid route. Discussions remain ongoing with landowner's agents.	No comment.	No comment.
2.5 Under Discussion	Whether all reasonable alternatives to compulsory acquisition have been explored	The Applicant outlines the approach to alternatives in the Statement of Reasons (doc. ref: 4.1) and Chapter 3 of the ES (doc. ref. 6.1.3). Negotiations continue with stakeholders to avoid the need for compulsory	LCC is a landowner for the Highways network and also on the grid route. Discussions remain ongoing with landowner's agents.	No comment.	No comment.

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		acquisition.			
2.6 Under Discussion	The adequacy and security of project funding.	Relevant information is provided in the Funding Statement (doc ref 4.3, APP-019).	LCC is a landowner for the Highways network and also on the grid route. Discussions remain ongoing with landowner's agents.	No comment.	No comment.
3. Draft Development Consent Order (dDCO)					
3.1 Under Discussion	The appropriateness of the draft Development Consent Order including its structure, scope, provisions, requirements and protective provisions	The draft DCO is based on legal precedent and includes the appropriate structure, scope, provisions, requirements and protective provisions.	Under Discussion.	Under Discussion.	Under Discussion.
4. Energy Generation and Storage					
4.1 No comment	Likely potential energy generated by the solar panels	Sufficient to power some 100,000 homes – calculations are provided in the Consultation Report – Appendix 1 (APP-	No comment.	No comment.	No comment.

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		024).			
4.2 No comment	Capacity of the secured Grid connection	Sufficient for the scheme proposed as detailed in the Grid Connection Statement (doc. ref. 5.4, APP-051).	No comment.	No comment.	No comment.
5. General and Cross-Topic Matters					
5.1 No comment	Air Quality	There are not expected to be any significant cumulative and in combination effects with any other schemes on the shortlist for this ES. There are expected to be no significant effects to air quality as a result of the Proposed Development.	Defer to other parties with expertise, notably North Kesteven District Council and Boston Borough Council’s Environmental Health Officers.	No comment. The Council agrees that allied with the annual average background concentrations, and the suggested additional mitigation of dust emissions and Non-Road Mobile Machinery emissions during the construction phase as set out in the Outline Construction Environmental Management Plan, there will be no likely significant effects to air quality at existing	No comment.

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				sensitive receptors, with the overall impact 'negligible'.	
5.2 Under Discussion	Alternatives and site selection	<p>Alternatives such as other technologies have been considered, as well as a comprehensive back check process, as outlined in Chapter 3 of the ES (doc. ref. 6.1.3, APP-056). This is guided primarily by grid availability, and a willing landowner.</p> <p>Further details on the alternatives and requirement of Policy EN-1 are covered in the Applicant's Issue Specific Hearing 2 Summary of Oral Statement - that being that any alternative site would fail to comply as they are not deliverable in</p>	Under discussion.	Flood risk sequential test parameters agreed with The Applicant. However this topic remains under discussion as it remains for the Examining Authority to determine if a smaller scheme would have reduced the impact on Best and Most Versatile Agricultural Land, and therefore an alternative to the Proposed Development. There is a large reliance in the sequential test approach to being able to bring forward earlier renewable energy delivery relative to a connection into Spalding substation, and also more straightforward option/legal agreements relative to multi-	No comment.

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		the same timescale.		landowner alternative sites, and which should be a particular focus for the ExA.	
5.3 Under Discussion	Benefits	Benefits include a permissive path, business rates, a community orchard with access by arrangement, ongoing farming and energy provision for the landowner in conjunction with a shepherd, and most importantly working towards net zero targets.	Welcome the addition of the permissive path, question how much it will be used, preference for paths to be permanent. Links to other paths outside of the Order Limits would also be welcomed. Biodiversity Net Gain noted subject to being secured. Further information is required on how the grazing is secured.	Partial agreement as NKDC questions the farming benefit accruing from grazing, and whether this is tangible. NKDC agrees that if the Flood Risk Sequential Test is accepted then the scheme would satisfy the 'exception test' community benefit element.	No comment.
5.4 Under Discussion	Cumulative and in-combination effects with other projects and developments in the locality including other solar farm proposals in	Cumulative and in-combination effects considered within the relevant EIA Chapters. The Applicant has addressed the	Totality of the projects across Lincolnshire will be a key focus for LCC during the Examination, particularly in relation	Partial agreement - Cumulative socio-economic and climate change are considered positive. Cumulative ALC and farming implications across all projects are	No comment.

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	the region	<p>cumulative projects in the Interrelationship Report submitted at Deadline 1 (REP1-021).</p> <p>A further cumulative assessment including those projects listed by NKDC is submitted at Deadline 2 (ExA.ESTN-Cumulative-D2.V1).</p> <p>The cumulative adverse effect on agricultural land noted is due to the proposed reservoir, which has a significance impact on a project-alone level. The conclusion on land use is that the additional cumulative sites result in greater land use change, but that is not an economic environmental</p>	to loss of Best and Most Versatile land; and potential landscape impacts. Update the list with any new schemes coming forward.	negative. Table 25.1 of the NKDC LIR contains a summary of cumulative effects. NKDC note the information gap between —Beacon Fen Solar, Fosse Green Solar, Springwell Solar and the Reservoir. — However, accept that the Applicant had to draw a line to ensure the ES could be completed — in time Following the submission of the Interrelationship Report NKDC note — cumulative adverse effect in relation to agricultural land across Lincolnshire and cumulative adverse LVIA effect in relation to Beacon Fen Energy Park.	

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		impact. The conclusion on LVIA is that the addition of the Proposed Development would cause no significant cumulative effects upon the character of the landscape or visual receptors.			
5.5 No comment	Electromagnetic field effects	Considered within Chapter 18 of the ES.	No comment.	No comment.	No comment.
5.6 No comment	Extent of the Rochdale envelope	Considered within Chapter 4 of the ES, with necessary flexibility in-built for a project of this nature.	No comment.	No comment.	No comment.
5.7 Under Discussion	Fire and safety hazards associated with storage technology	Considered within a separate Outline Energy Storage Safety Management Plan. This is a certified document,	LFR seeking Section 106 to monitor ESS systems.	No comment other than to note that NKDC will be making written submissions regarding the need to consider the use of Lithium-Iron	No comment LIR neutral negative subject to Lincolnshire Fire and Rescue

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		secured under Requirement 7 of the DCO.		Phosphate batteries.	agreement of the provisions. All BBC can achieve is that fire risk is considered, it is designed out as far as possible and there are protocols and mechanisms in place to further reduce risk and manage its impact if fire occurs. Doc. ref. 7.11 seeks to do this.
5.8 Under Discussion	Greenhouse gas emissions arising during all phases	Considered within Chapter 17. <u>To confirm we have not assessed the energy required for disposal / recycling due to the uncertainty of processes and quantity of material -</u>	Not querying the conclusions of Chapter 17, similarly to NKDC, if recycling is included in the assessment and would this change overall conclusions.	The submitted data / estimates in the ES does not account for GHG emissions associated with the recycling or disposal of components and panels at specialist disposal facilities; rather that all material is produced for the first	No comment.

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
		<p><u>as outlined at paragraph 13.3.44 of Chapter 17 (PS-071). But equally neither have we used the high recyclability of this material to mitigate the impacts of the initial embodied carbon (e.g. assuming that no recycled material has been used in their production) – as per 13.3.47 'To reduce the lifetime impact associated with the embodied carbon of all products and equipment, recycling of reclaimed materials would be strongly encouraged upon end of life decommissioning. However, this assumption has not been applied to the calculation</u></p>		<p>time use in the development, and then recycled post-development.</p>	

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
		<p>methodologies to be consistent with the conservative approach to impact assessment.</p> <p>The nature of recycling makes the attribution of embodied carbon impacts of materials a bit ambiguous across many use lifecycles to avoid double counting, and therefore we have made the assumption that all material is essentially produced for the first time use in the development, and then recycled post-development. Recycling is covered in the Outline Decommissioning and Restoration Plan (document reference 7.9).</p>			

STATEMENT OF COMMON GROUND

RELEVANT PLANNING AUTHORITIES

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
5.9 No comment	Human health and wellbeing	Considered throughout the ES.	No comment.	No comment.	No comment.
5.10 Agreed	Need case	Considered within the Planning Statement and Statement of Need, crucially to meet net zero requirements.	As per EN1/EN3 the Applicant does not need to prove a Need case for renewable energy, as such LCC has no comment.	As per EN1/EN3 the Applicant does not need to prove a Need case for renewable energy, as such NKDC has no comment.	As per EN1/EN3 the Applicant does not need to prove a Need case for renewable energy, as such BBC has no comment. No comment.
5.11 Under Discussion	Noise and vibration	Considered within Chapter 12. An Operational Environmental Management Plan is submitted at Deadline 2 (ExA.oOEMP-D2.V1).	Defer to other parties with expertise, notably North Kesteven District Council and Boston Borough Council's Environmental Health Officers.	Short term negative construction impact. Particular consideration needed for Elm Grange school. Operationally no comment, as this forms part of the Requirements / Outline CEMP and requested Operational Environmental Management Plan.	No comment.
5.12 Under	Policy and legislation including emerging	ES complete and supported by	Policies will be detailed further in the	The NKDC LIR discusses relevant policy to be	No comment.

Reference and Status	Topic	Applicant’s Position	LCC’s Position	NKDC’s Position	BBC’s Position
Discussion	National Policy Statements (NPS).	<p>Statement of Need and Planning Statement. NPS considered in Updated Statement of Need and Planning Statement with the Change Application.</p> <p>At Issue Specific Hearing 2, the Applicant explained that Best and Most Versatile land accounts for 42% of England but in Lincolnshire it is about 71% and in North Kesteven about 67% (ES Chapter 16, paragraph 16.5.20, APP-069).</p> <p>The practical difficulties of farming the BMV mixed with the poorer quality land, is hindered by a complex pattern of land quality (Inserts</p>	LIR. An appendix of policies to be added to a further iteration of this SOCG. This issue is under discussion.	engaged in relation to each technical chapter. Not agreed, notably due to the Draft EN3 which notes avoidance on BMV impacts. NKDC specifically references paragraph 3.10.14 of the 2023 draft National Policy Statement for Renewable Energy Infrastructure (EN-3) which confirms that whilst land type is not a determining factor, only where the proposed use of any agricultural land over and above despoiled and brownfield 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)’. NKDC consider that the	

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
		<p>6, 7, 8 and 9 of Chapter 16, APP-069).</p> <p>Using the BMV land for pasture is considered a change of use; rather than a loss and therefore ongoing agricultural operations can continue.</p>		<p>Applicant has not proven that the 'need' to develop BMV land has been clearly established (by reference to CLLP policy S67, point (i), nor in relation to point (iii)) that the impacts of the proposal upon ongoing agricultural operations have been minimised through the use of appropriate design solutions.</p>	
5.13 Under Discussion	Relevant DCO decisions and High Court challenges	The DCO is based on various made Orders across the energy sector and, more specifically, solar DCO projects such as Longfield, Little Crow DCO, and Cleve Hill.	Under review.	To be agreed. No High Court challenges to comment on.	No comment.
5.14 No comment	Waste management, including replacement equipment and decommissioning	Considered in Chapter 18, and Chapter 17 where necessary.	No comment, GHG associated with decommissioning covered above.	No comment, GHG covered above.	No comment.

Reference and Status	Topic	Applicant’s Position	LCC’s Position	NKDC’s Position	BBC’s Position
6. Historic Environment					
6.1 Under Discussion	Effects on designated and non-designated heritage assets and their settings	Considered in Chapter 10. <u>With regards to South Kyme Tower, there are no known significant sightlines towards or across the Energy Park. When the tower was in use, it formed part of a larger building and so in all likelihood views towards the Proposed Development would have been possible only from a second floor window and the tower battlement. There are of course mid and long ranging views of the Tower from the surrounding landscape. There is no indication that the Tower was positioned or orientated to ensure its prominence</u>	In respect of build form LCC defers to North Kesteven District Council’s Conservation Officer, Heritage Trust Lincolnshire and Historic England. Further comments below in relation to non-designated heritage assets in particular buried archaeology.	Only South Kyme Tower (scheduled and listed) some harm to setting. Degree of less than substantial harm by Conservation Officer. Otherwise agree with ES conclusions.	No comment.

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
		<p><u>specifically in views from or across the Energy Park. The Energy Park would be visible at long range from the top of the tower, seen within a landscape whose character is derived principally from 18th-century drainage and later development – i.e. not representative of the medieval and earlier post-medieval periods when the tower was built and used. There would be some co-visibility of the Energy Park and the Tower in views from the A17 but these views are at such long range that it is difficult to clearly distinguish and identify the tower; therefore these are</u></p>			

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
		<p><u>not considered key views of the asset.</u></p> <p><u>The geographical and topographical context of the tower, and the current potential range of the views towards and from it, would not be changed. The change to the character of a part of the wider landscape that is already of modern character will not result in harm to the significance of the asset.</u></p>			
6.2 Under Discussion	Appropriateness of schemes of investigation for archaeology	Trial trenching not completed on the cable route. Outline WSIs included for Evaluation and Mitigation sections, associated with the cable route and energy park (and	Key areas to be considered include archaeology - LCC Archaeologist advice that trial trenching is completed. Sufficient trenching completed on Energy Park to inform a	Key areas to be considered include archaeology - Heritage Trust Lincolnshire advice that trial trenching is needed before determination. NKDC position is that there is an appropriate level of	BBC notes the Applicant is undertaking trial trenching on the cable grid route where access is available. Subject to

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
		<p>subsequent cable route following Evaluation e.g. trial trenching). Trial trenching on the cable route is scheduled to be completed after harvest, subject to the necessary landowner consents. An Outline Written Scheme of Investigation – Evaluation and an Outline Written Scheme of Investigation – Mitigation is submitted with the Application (doc. ref. 7.13 and 7.14) and secured within Requirement 12 of the DCO. Mitigation is secured by the Requirements and therefore should it not be possible to complete trial</p>	<p>Mitigation Strategy.</p>	<p>baseline information to inform the Archaeological Mitigation Strategy for the energy park site, however clarity of the six priority areas proposed for 'strip map record' (NKDC LIR paragraph 16.21) is required. However, impact significance cannot yet be determined along the cable corridor pending the submission of trial trenching results.</p>	<p>Historic England and Heritage Trust Lincolnshire agreement BBC offer no further comment.</p>

Reference and Status	Topic	Applicant’s Position	LCC’s Position	NKDC’s Position	BBC’s Position
		trenching prior to determination there is sufficient protection in the Requirements to ensure it is completed prior to commencement.			
7. Land Use and Soils					
7.1 Under Discussion	Appropriateness and accuracy of Best and Most Versatile designations within the site	The Energy Park comprises 50.6% Grade 3b, and 49% a mix of Grades 1 (11.1%), 2 (7.4%) and 3a (30.5%) in a complex pattern mostly intermixed with Grade 3b, such that few fields are wholly of BMV quality. A total of 81% is Grade 3.	Subject to LIR confirmation, this issue is under discussion.	NKDC’s position is that the spatial approach, distribution and analysis of soil augering is acceptable relative to the size of the site. Appropriate methodologies have been adopted. NKDC agree with the proportions of BMV presented however point to there being very limited margin for professional interpretation, noting the subjectivity of overall assessment. This is relevant mindful of the	No comment.

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
				near 50/50 proportions of BMV to non-BMV.	
7.2 Under Discussion	Loss of BMV agricultural land including implications for food production and supply	<p>The Savills Report (APP-220) provides useful context to why the land is not producing food for human consumption, e.g. availability of irrigation; drainage; storage; soil quality; weed and pest burdens. Food production will remain possible due to the presence of sheep being grazed.</p> <p>Policy S67 refers to the 'loss' of the BMV land – the word loss is important in this context, as it is predominantly a change of use – not a loss.</p> <p>Taking to the rest of the Policy, it is noted</p>	Subject to LIR confirmation, this issue is under discussion.	Not agreed. NKDC highlight that there is a near 50/50 distribution of BMV to non-BMV across the energy park site and its does not differentiate between the proportions of G1, G2 and G3(a); all are noted as Best and Most Versatile. Whilst the assessment methodology is accepted, in real terms the difference between G3(a) and (b) is quite small and there is a degree of subjectivity in interpretation. The Council's position is that the loss of 257ha of BMV across the energy park site is 'significant' both in an individual and cumulative (with other solar NSIPs) context.	No comment.

Reference and Status	Topic	Applicant’s Position	LCC’s Position	NKDC’s Position	BBC’s Position
		<p>the need has been clearly established and insufficient lower grade land available; benefits and/or sustainability considerations outweigh the need to protect such land; taking into account the economic and other benefits; impacts upon agricultural operations have been minimised through the use of appropriate design solutions (including a Soil Management Plan) and where feasible the land will be restored. These points will form a large part of the Examination and it is not proposed to repeat them verbatim here - however the need for</p>		<p>NKDC consider that the Applicant has not proven that the ‘need’ to develop BMV land has been clearly established (by reference to CLLP policy S67, point (i), nor in relation to point (iii) that the impacts of the proposal upon ongoing agricultural operations have been minimised through the use of appropriate design solutions Key areas to be considered include weight afforded to best and most versatile land in planning balance and mitigation through grazing.</p>	

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
		renewable energy is paramount; providing economic benefits locally; minimal impact as agriculture will continue with no jobs lost; and can be returned to its former use after the operational life of the project.			
7.3 Under Discussion	Proposed uses of the land once operational	The site will remain in agriculture as it will be grazed. This is secured by legal obligation of Requirement 8, which secures the Landscape Ecological Management Plan (the outline of which explains the detail of sheep grazing).	Subject to LIR confirmation, this issue is under discussion.	As above – plans for mitigation of BMV impacts through grazing are not yet defined/agreed.	No comment.
7.4 No comment	Proposals for soil stockpiles and bunds	These will largely be in areas determined by final track positions and in	No comment.	No comment. NKDC agrees without prejudice that a Soil Management Plan can be secured by	No comment.

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
		<p>proximity to where the soil is removed. Further details will be added to the Outline Soil Management Plans which is included <u>now a standalone plan, and requirement of the DCO at Deadline 2 (document reference 7.15).</u> as part of the Outline Construction Environmental Management Plan, secured under Requirement 13 of the DCO.</p>		Requirement.	
7.5 Under Discussion	Soil Management Plans	<p>Outline Soil Management Plans (Energy Park and Cable Route) are included <u>(document reference 7.15).</u> as part of the Outline Construction Environmental Management Plan.</p>	Further review of the Outline Plans to be completed by LCC.	Dealt with by Requirement, further discussion on additional Requirement with the Applicant (without prejudice to the Council's position regarding BMV).	No comment.

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
		This can be updated with further clarification accordingly if required.			
7.6 Under Discussion	Site restoration following decommissioning	Outline Decommissioning and Restoration Plan are required as part of the certified documentation pack.	Further review of the Outline Plans to be completed by LCC.	Dealt with by Requirement the terms of which are still under discussion.	No comment.
8. Landscape and Visual, and Design					
8.1 Under Discussion	The study area, including Zones of Theoretical Visibility (ZTV)	The study area and ZTV have been considered appropriately, and proportionately.	Subject to LIR confirmation, this issue is under discussion.	No comment, agree with the ES.	No comment.
8.2 Under Discussion	Landscape effects, identification of valued landscapes and setting of settlements	Any potential for adverse effects has been judged to be considerably limited by the existing vegetation that characterises the close to medium	Refer to LIR, in particular definition of and application of 'significant' in relation to 'moderate effect'.	No comment, agree with the ES. The Council's position is that negative LVIA impacts accrue. Chapter 12 of the NKDC LIR refers.	No comment.

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
		range landscape.			
8.3 Under Discussion	Visual effects and identification of sensitive receptors	Whilst certain elements of the Proposed Development would, inevitably, be more visible, for a scheme of its scale the residual landscape and visual effects arising are considered to be highly limited.	Subject to LIR confirmation, this issue is under discussion.	No comment, agree with the ES. The Council's position is that negative LVIA impacts accrue. Chapter 12 of the NKDC LIR refers.	No comment.
8.4 Under Discussion	Glint and glare	Considers residential properties, road, rail, air traffic and national trails. Glint is theoretically possible for many receptors before taking screening into account but is only visible to a few receptors after the existing screening is accounted for.	Subject to LIR confirmation, this issue is under discussion.	No comment, agree with the ES.	No comment.
8.5 Under	Mitigation proposals	The proposed	Subject to LIR	To be agreed by	No comment.

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
Discussion		mitigation planting has the potential to considerably reduce significant effects, which would be geographically highly limited, both in character and visual terms.	confirmation, this issue is under discussion.	Requirement (Outline Landscape and Ecological Management Plan - document reference 7.8).:-	
8.6 Under Discussion	The Rochdale Envelope in relation to design and scale parameters and flexibility	ES complete including where Rochdale Envelope principle required.	Subject to LIR confirmation, this issue is under discussion.	No comment	No comment.
8.7 Under Discussion	Consideration of good design and relevant guidance for all above ground structures including solar panels, substations and storage equipment	Since inception of the project design has been considered and updated following consultation; including set back from properties and watercourses; relocation of the substation and energy storage and routing of the grid connection to Bicker Fen	Subject to LIR confirmation, this issue is under discussion.	No comment	No comment.

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
		Substation.			
8.8 Under Discussion	The need for a Design Approach document to guide detailed design, with consideration of future consultation and approval of detailed design proposals post-consent	The design approach document to guide detailed design is the Outline Design Principles (doc. ref. 7.1) which will be a certified document and is secured by Requirement 6 of the DCO. Consultation is a necessary part of the Examination process and is in-built into Requirement 6 for submission of the final design details.	Subject to LIR confirmation, this issue is under discussion.	No comment – no objection to securing by Requirement.	No comment.
9. Socio-Economics					
9.1 Under Discussion	Economic and employment effects during all phases including on tourism and local businesses	The Proposed Development would lead to no adverse significant effects from a socio-economic perspective. The Proposed Development will	No comment.	Partially agreed – some negative impact on accommodation availability during construction (to tourists).	Potentially positive during construction, otherwise neutral.

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
		<p>result in beneficial effects in terms of employment, economic contribution, and business rates in all relevant phases of development, and adverse but not significant effects in EIA terms on accommodation demands in the construction and decommissioning phases. An Outline Supply Chain, Employment and Skills Plan has been produced to optimise the number of local people who will have access to employment and training opportunities arising from the Proposed Development and is secured by DCO requirement (Doc.</p>			

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
		Reference 7.12).			
9.2 Under Discussion/Agreed	Effects on local living conditions and communities including recreational impacts	<p>Whilst there are some localised significant visual effects none would be overbearing. Potential significant noise effects are identified if trenchless works is required and remains active at night, depending on the final locations where this may be required on the grid route. No recreational impact currently allowed over the majority of the Energy Park site save for nearest neighbours walking their dogs by agreement with the landowner.</p> <p>The CTMP doesn't go into detail for each road crossing as</p>	Topics considered within other sections of the SOCG including permissive path; construction traffic management, and landscape and visual including residential visual amenity.	Negative residential visual amenity until year 5 as per the ES. Positive on the community orchard (access by agreement) and permissive path subject to securing by Requirement. Overall agree with ES conclusions and Lavender Test. Particular consideration needed of construction impacts to Elm Grange School. CEMP and OEMP to be secured by Requirement; under discussion.	No comment.

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
		<p>typically traffic management would be determined by the contractor. However, para. 7.26 suggests that it may be necessary to implement some night-time closures on the A17. The CTMP suggests that drills may be required for the A17, railway line and South Forty Foot Drain but a worse case for the traffic and access considers trench and duct. Paragraphs 7.30 to 7.36 suggest that the traffic will likely be managed by either give and take, stop/go boards, temporary traffic signals or as a last resort, a road closure. In terms of impacts on residents, the</p>			

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		<p>CTMP at para. 7.24 notes that it is envisaged the cable run will be constructed outside the peak construction for the Energy Park to minimise conflict and impact on the highway network, and at paragraph 7.25 suggests that before construction a letter will be delivered to the nearest properties.</p>			
<p>10. Traffic and Transport</p>					
<p>10.1 Under Discussion</p>	<p>Access proposals</p>	<p>Main site entrance approved via previous application and still represents the best solution to avoid the nearest neighbours. Scheme amended to incorporate Triton Knoll access track to avoid Bicker village</p>	<p>At this stage, traffic and transport, subject to agreement with Construction Traffic Management Plan and Construction Environmental Management Plan this is considered neutral with no fundamental</p>	<p>No comment.</p>	<p><u>No comment</u> Neutral—subject to LCC agreement.</p>

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
		<p>and residents on Cowbridge Road for the Applicant's construction traffic. Discussions are ongoing with National Grid to secure appropriate measures for construction of the Bicker Fen extension and seek to minimise the impact on residents along Cowbridge Road. Tracks connecting to the grid route corridor are included to ensure they can be maintained for grid route access, e.g. repair potholes etc.</p>	<p>concerns. There is an impact but can be dealt with through Requirement. Further detail including in the LIR.</p>		
<p>10.2 Under Discussion</p>	<p>Effects on the local and strategic road networks, rail network and public rights of way (considered under 10.3)</p>	<p>Numbers are below 10% threshold of A17. There will be an increase in vehicles using the local highway network during the</p>	<p>Refer to LIR.</p>	<p>No comment.</p>	<p>No comment.</p>

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
		<p>construction period from both HGV movements and construction staff accessing the site. The impact of the construction phase traffic for the Energy Park, the cable route and the National Grid Bicker Fen Substation Extension is considered to be of Negligible significance, and therefore in EIA terms is Not Significant.</p> <p>No impact on rail network anticipated.</p>			
10.3 Under Discussion	Effects on non-motorised users, public rights of way and bridleways	The impact on bridleways and public rights of way are limited to the grid route, whereby they will be predominantly drilled under e.g. along the South Forty	Refer to LIR.	No comment.	No comment.

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
		Foot Drain.			
11. Water Environment and Flood Risk					
11.1 Under Discussion	Flood Risk Assessment (FRA) including identification of risk zones and climate change allowance	Considered as part of Chapter 9, and a separate appendix.	Refer to LIR.	Sequential test noted above, to be agreed interpretation of sequential test and alternatives. Exception Test likely to be passed is agreed. No comment in relation to identification of risk zones and climate change allowance. NKDC has no comments on the Flood Risk Assessment.	No comment.
11.2 Under Discussion	Surface water drainage strategy	Considered as Part 2 of the FRA which is an appendix to Chapter 9. Predominantly swales at field edges.	Refer to LIR.	Agreed/no comments.	No comment.
11.3 Agreed / No comment	Water quality including groundwater	Considered within Chapter 9 of the ES.	No comment.	Agreed/no comments.	No comment.
11.4 Agreed / No comment	Watercourse crossings	Considered within Chapter 4 of the ES.	No comment.	Agreed/no comments.	No comment.

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
11.5 Agreed / No comment	The Water Framework Directive	Considered within Chapter 9 of the ES.	No comment.	Agreed/no comments.	No comment.
12. Other Matters					
12.1 Under Discussion	The Environmental Statement including its scope, methodology, baseline, likely significant effects, in-combination effects, mitigation measures and management plans.	All environmental constraints and sensitive receptors relevant to the determination of the application have been considered in the application plans and documents. The submitted EIA assesses the realistic worst-case effects of the development.	Methodology of LVIA as outlined above.	NKDC confirm that the methodology, likely significant effects, in-combination effects for all chapters agreed, the exception is the baseline for archaeology. NKDC agree that in principle Requirements can be drafted to agree mitigation measures and management plans. NKDC does not agree with mitigation measures currently presented in relation to BMV land (sheep grazing), and certain archaeological and ecological matters including evidence of ability to deliver the BNG amounts as predicted.	No comment.

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
12.2 Under Discussion	The need case, site selection and consideration of alternatives.	ES complete and considers alternative layouts and back check review on other sites. Planning Statement includes Need Case. The Applicant details local Policy S67 above; and further consideration of EN-1, and it's latest Draft are covered in the Statement of Need and Planning Statement.	Refer to Section 5.10 above.	The general 'need' case is not challenged, site selection is covered under Flood Risk and alternatives. NKDC does not consider that the 'need' to develop BMV land has been fully justified by reference to national and local policy. Alternative layouts have been considered, and NKDC notes removal of some areas of BMV from the draft Order Limits during pre-application.	Refer to Section 5.10 above. Neutral overall for climate change impacts (noting scheme is predominantly in NKDC rather than BBC).
12.3 Under Discussion <u>Agreed</u>	Cumulative effects with other NSIPs and major projects in the region.	ES considers cumulative schemes including a further interrelationship report to be used as part of the Examination.	Refer to Section 5.4 above.	Beacon Fen, Fosse Green and Springwell, and Lincolnshire Reservoir - not addressed in detail owing to timescales of submission. Two further TCPA 1990 sub-50MW solar farms at Little Hale Fen (live planning application) and	No comment.

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
				Scredington (EIA Screening) also highlighted. NKDC highlights a particular concern regarding cumulative BMV impacts with other NSIP solar projects in Lincolnshire. The Interrelationship Report now considers these schemes (REP1-021).	
12.4 Under Discussion	Planning compliance. policy	Planning Statement and Chapter 5 consider the compliance with local and national planning policy.	Refer to Section 5.12 above.	Not agreed primarily in relation to BMV. See NKDC LIR for discussion of policy compliance for specific technical areas.	No comment.
12.5 Under Discussion/Agreed	The dDCO, its Articles and Requirements.	Further details available in the Explanatory Memorandum.	Refer to Section 3 above. Under Discussion.	Refer to Section 3 above. Under Discussion	No comment.
12.6 Agreed / No comment	Any other matters raised by interested local residents, Members of the Council	Agri-voltaics considered by subsequently ruled out. Compromise is	No further comment in addition to the above.	No comment. See above in relation to cumulative effects and fire risk (battery selection)	No comment.

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
	and internal consultees.	reducing the Order Limits and areas remaining in arable agriculture along the southern and western boundary.		raised by NKDC Members in debate of the NKDC LIR. These matters will be set out in the Written Representation.	

SIGNATORIES

The above SoCG is agreed between Ecotricity (Heck Fen Solar) Limited ("the Applicant"), North Kesteven District Council, Lincolnshire County Council and Boston Borough Council, as specified below.

Duly authorised for and on behalf of Ecotricity (Heck Fen Solar) Limited

Duly authorised for and on behalf of Lincolnshire County Council

Name:	Laura White
Job Title:	Senior Development Manager
Date:	
Signature:	

Name:	
Job Title:	
Date:	
Signature:	

Duly authorised for and on behalf of North Kesteven District Council

Duly authorised for and on behalf of Boston Borough Council

Name:	
Job Title:	
Date:	
Signature:	

Name:	
Job Title:	
Date:	
Signature:	