

# Heckington Fen Solar Park

EN010123

## Applicant Response to Deadline 1 Submissions

Applicant: Ecotricity (Heck Fen Solar) Limited

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**APPLICANT RESPONSE TO DEADLINE 1 SUBMISSIONS**

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**1. INTRODUCTION**

- 1.1 The purpose of this report is to provide responses from the Applicant to the documents received at Deadline 1.
- 1.2 The following documents were received by the Planning Inspectorate at Deadline 1:
  - Boston Borough Council (BBC) summary of Relevant Representations (**REP1-026**);
  - Lincolnshire County Council (LCC) response to Action Points from Issue Specific Hearings 1 and 2 (**REP1-030**)
  - Black Sluice Internal Drainage Board (BSIDB) further information as requested during Issue Specific Hearing 2 (**REP1-034**);
  - BBC response to the Change Request Application (**REP1-027**);
  - North Kesteven District Council (NKDC) response to the Change Request Application (**REP1-032**); and
  - Environment Agency’s (EA) response to the Change Request Application (**REP1-035**).
- 1.3 Other documents received at Deadline 1 included the Local Impact Reports - which are considered in the **Applicant’s Response to Local Impact Reports** – Deadline 2 Submission (ExA.ResponseLIR-D2.V1). Requests from Interested Parties for locations for the Accompanied Site Inspection were received in advance of Deadline 1 and incorporated into the Figure attached to the **Cover Letter** submitted by the Applicant at Deadline 1 (ExA.CL-D1.V1 – REP1-001) and resubmitted with the **Cover Letter** for Deadline 2 (ExA.CL-D2.V1) along with the Draft Itinerary for the Accompanied Site Inspection (detailed in the Cover Letter). This document considers the remainder of the documents received at Deadline 1, as listed above, separated into six tables.

**Table 1 – Responses to BBC summary of Relevant Representations**

Theme	Consultee Comment (REP1-026)	Applicant Response
Residential Visual Amenity	The solar park is located within North Kesteven District and the eastern boundary of the site runs along the Borough / District boundary. The Borough has residents that are about 800m from the site boundary. One dwelling that fronts the A17 will be about 450m from the solar park and will have the cable route pass to its north and east. The impact of the solar park on Boston Borough residents is reduced by distance, any intervening natural and built landscape features and the proposed boundary hedge to the solar park.	The Applicant notes this comment, and no further response is deemed necessary.
Grid Connection	The direct impact of the solar park on the Borough relates to the cable route to the National Grid substation at Bicker Fen. However, this impact is temporary whilst the route is excavated, the cables installed and the trench re filled, with the agricultural land being restored to agriculture.	The Applicant notes this comment, and no further response is deemed necessary. An Outline Soil Management Plan (based on previous information appended to the Outline Construction Environmental Management Plan) has been prepared and submitted as part of the application (Document Reference 7.15) which strives to protect the quality of the soil during the construction process so that it retains its integrity once it returns to agriculture at

Theme	Consultee Comment (REP1-026)	Applicant Response
		the operational phase. Natural England have reviewed this Outline Soil Management Plan. The latest Statement of Common Ground shows Natural England’s broad agreement with the Outline Soil Management Plan (document reference 7.6i).
Grid Connection	The Borough has experience of Triton Knoll offshore wind farm and Viking Link Interconnector installing cables across our landscape to connect to the Bicker Fen Substation. BBC also had an Anglian Water pipeline installed to link the town of Boston to a point of supply to the north that also crossed East Lindsey District Council. From this experience once the cable work is complete the visual impact of the disturbed route is minimal, relating to marker posts to warn of buried cables and any repaired hedgerow planting whilst it establishes.	The Applicant notes this comment, and no further response is deemed necessary.
Climate Change	BBC is broadly supportive of the proposals for a variety of reasons including but not limited to: It contributes to the nation’s transition from hydrocarbons. The solar park will have less whole life cycle GHG intensity than hydrocarbon fuels (Chapter 13 inset 13.2) and although its individual impact on sea level rise is close to zero it, along with other non-hydrocarbon fuels, represents an appropriate direction of travel.	The Applicant notes this comment, and welcomes the support offered by BBC.
Air Quality	BBC does however believe there are a series of issues which require further detail, clarification, analysis or discussion, these include but are not limited to: The documentation shows that dust and emissions will be controlled during construction and decommissioning by various management plans. However, wind direction could introduce fumes from fire across the Borough and so the Borough would like more detail on what measures are to be employed in the event of a fire to protect residents from fumes;	The Applicant refers BBC to the Outline Energy Storage Safety Management Plan (OESSMP) (document reference 7.11/APP-242) which will be updated once the final technology for energy storage has been chosen. The energy storage system emergency response plan (section 2.1.4 of the OESSMP) will include the management of fumes from fire and will be informed by several factors, such as final technology choice; plume analysis; and a Fire Risk Assessment which is noted in the OESSMP. As can be expected there will be a strong emphasis on prevention of fire, suppression of fire and containment of fire to prevent it spreading. The OESSMP was developed following consultation with the Lincolnshire Fire Authority. The design of the Energy Storage System (ESS) follows the principles requested by Lincolnshire Fire Authority in these pre-submission discussions. The National Fire Chiefs Council (NFCC) published on 21/04/2023 a Guidance Note for “Grid Scale Battery Storage System Planning” which outlines the possible design considerations which should be considered. This Guidance Note states that consideration should be given

Theme	Consultee Comment (REP1-026)	Applicant Response
		<p>to site geography and prevailing wind conditions, which has been undertaken in the submitted Plume Assessment within the OESSMP. It also advises that research is indicating that the installation of a water-based suppression system for suppression of a fire within a cell model system is most effective and a gas suppression system for electrical fires within non-cell systems. The design presented within the application has incorporated design allowances for both types of fire suppressant system to ensure the air quality risk from a fire within the operational ESS is reduced to 'As Low As Reasonably Practicable (ALARP)'. The Health and Safety at Work Act 1974 introduces the principle of reducing risks 'So Far As Is Reasonably Practicable' (SFAIRP). Reducing risk 'As Low As Reasonably Practicable' (ALARP) is essentially the same thing, and compliance with The Health and Safety at Work Act 1974 is a legal requirement. The OESSMP activities will deliver a safety justification that will show that this is met.</p>
<p>Cultural Heritage</p>	<p>The documentation says heritage setting assessments, archaeological desk-based assessment and geophysical survey of the Cable Route Corridor for the grid connection has been undertaken. However, unlike the Energy Park site no trial trenching has been undertaken prior to submission. A written Scheme of Investigation for trial trench evaluation of the cable route shows 240 trenches over the cable route. BBC would like to know when this work is to be undertaken;</p>	<p>The Applicant notes this comment and confirms that further trial trenching will be undertaken prior to commencement of development of the cable route. As at Deadline 1 (3 October 2023) 57No. archaeological trenches had been dug within the grid route corridor and considered by the County Archaeologist. A further 10 additional contingency trenches were dug. The documentation submitted at Deadline 2 has been updated to incorporate the results of the trial trenching, completed on the cable route to date. Discussions are ongoing with the landowners of the Offsite Cable Route Corridor. The progress of these discussions can be seen within the Book of Reference (BoR) (doc. ref. 4.3, Version 4) submitted at Deadline 2. Because of the intrusive nature of these investigation works landowner consent has not yet been obtained along the full route. It is likely that this work will now be undertaken after the next harvest. However, in the event that the Applicant is unable to undertake a full scheme of trenching prior to the close of examination, it will become a pre-commencement activity as the control is secured under Requirement 12, Schedule 2 of the draft DCO (document reference 3.1). The Applicant cannot commence construction of the cable route until the archaeological evaluation is carried out and, to the extent necessary, mitigation put in place; it is therefore a matter of</p>

Theme	Consultee Comment (REP1-026)	Applicant Response
Biodiversity	<p>The majority of the land is considered to be of low conservation value. Biodiversity net gain is to be achieved on the Energy Park. What can be achieved along the cable route to link the new habitat on the solar park with landscaping around the Bicker Fen National Grid, Triton Knoll and Viking Link substations plus mitigation of impacts on the South Forty Foot Drain Local Wildlife Site?</p>	<p>when and not if the trial trenching will take place.</p> <p>The Applicant has considered BBC’s comment in relation to biodiversity gain along the cable route.</p> <p>Because the cable route crosses land and roads that are not under the control of the Applicant, increasing biodiversity and connectivity of habitats along the route is challenging. However, the Applicant has considered opportunities such as including infill planting within the roadside verge at Bicker Fen Substation. Other enhancements could include further planting within the district which may come forward under alternative mechanisms, or financial assistance given to third parties to undertake habitat enhancement and/or tree planting. No impacts on the South Forty Foot Drain need mitigating, as the cable will pass underneath the drain via a horizontal directional drill.</p>
Landscape and Visual Glint and Glare	<p>Various documents consider landscape and residential visual amenity, noise and vibration plus glint and glare. Outlook from the properties and the consequent impact on residential amenity is mitigated by the expansive nature of the location, distance between the Solar Park and the dwelling and any intervening landscape features. Two viewpoints in the Borough will experience a significant effect for a temporary period as the cable is installed. None of the properties judged to be visually affected are in the Borough but mitigation measures for the dwellings in North Kesteven will also benefit dwellings in Boston Borough such as physical separation, reducing the height of the panels and the position of the substation. Glint and glare on residents of the Borough relates to Boston Aerodrome, users of the A1121, part of the A17 and living near to the solar park. The highways have the potential for Significant effect prior to mitigation. This becomes Not Significant after mitigation. For residential impact there are a number of observation points that have been used to assess impact. Those in Boston Borough are OP24 to OP34. The impact on OP24 to OP28 are Not Significant. The impact on OP29 to OP34 is Significant prior to mitigation and Not Significant after mitigation. A mitigation feature is the planting of a boundary hedge but the height is different in different documents. The height needs clarifying.</p>	<p>The height of the hedgerows around the perimeter are different to help assimilate them into the landscape, and to ensure they do not shade the solar panels. Internal retained field hedgerows are proposed to be cut to a maximum of 3m high and site boundary hedgerows will be retained and maintained at either 3m, 3.5m or 5m to ensure views into the site are filtered. These heights are shown on the Landscape Strategy Plan shown in the Outline Landscape and Ecological Management Plan (document reference 7.8).</p>
Access	<p>We have looked at the draft DCO, and its schedules. In Schedules 4 and 7 BBC is</p>	<p>Schedules 4 and 7 in the DCO relate to the District in which the works are proposed,</p>

Theme	Consultee Comment (REP1-026)	Applicant Response
	listed. However, LCC is Highway Authority and we consider they should listed instead. We appreciate that the DCO may need to evolve throughout the DCO process as the Applicant seeks to respond to any issues raised.	rather than the Highway Authority. BBC are correct that LCC will be the discharging authority for works in the Highway.
Cumulative	Cumulative impacts in relation to the cable connection route should be adequately assessed, due to the number of proposed renewable energy proposals seeking to route cable connections to Bicker.	The cumulative sites to be considered within the ES was discussed at ISH2 with the RPAs offering oral input on the additional sites that should be considered. An update to the cumulative assessment is provided as a standalone report Deadline 2, ES Technical Note- Updated Information on Cumulative Projects (document reference ExA.ESTN-Cumulative-D2.V1).

**Table 2 – Responses to LCC response to Action Points from Issue Specific Hearings 1 and 2**

Theme	Consultee Comment (REP1-030)	Applicant Response
ISH1-AP6	<b>Article 17 - Authority to survey and investigate the land Part (6)</b> LCC take a neutral position regarding the 28 day period proposed and the deemed consent provision for non-determination of an application to dig trial holes. It is however suggested that the wording at (176) be amended to refer to 'an application for consent for trial holes' for the avoidance of doubt and to make clear which application is being referred to.	The Applicant notes this comment and has updated the draft DCO (document reference 3.1) at Deadline 2 with the wording suggested by LCC.
ISH1-AP2	<b>Comments on Schedule 2 and Schedule 14 of the DCO</b> The RPA's have liaised with the Applicant and provided them with a table identifying and suggesting which Authority should be responsible for the discharge of each of the Requirements.  The RPAs have provided the Applicant with some suggested revisions to the current drafting of the draft Development Consent Order (dDCO) which includes revisions to Article 42 and Schedule 14.	The Applicant is grateful to the RPAs for the table identifying and suggesting which Authority should be responsible for the discharge of each of the Requirements, received on 29 September 2023. The Applicant has worked with the RPAs to reach common ground on a number of the proposed DCO amendments (which are included in the DCO submitted at Deadline 2 (document reference 3.1, version 4)) and the Applicant has included a response document with the Deadline 2 submissions, Applicant Response to RPA Comments on the Draft DCO (document reference: ExA.ResponseDCO-D2.V1).  The Applicant is grateful to the RPAs for the table identifying and suggesting which Authority should be responsible for the discharge of each of the Requirements, received on 29 September 2023. As the Applicant only had 1 full business day to review before Deadline 1 this Action could not be completed. However, the Applicant has worked with the RPAs to reach common ground on a number of the proposed DCO amendments (which are included in the DCO submitted at Deadline 2 (document reference 3.1, version 4)) and the Applicant has included a response document with the Deadline 2 submissions,



Theme	Consultee Comment (REP1-030)	Applicant Response
		Applicant Response to RPA Comments on the Draft DCO (document reference: ExA.ResponseDCO-D2.V1) to make the necessary updates to the DCO for Deadline 2.
ISH2-AP11	<b>Accompanied Site Inspection (ASI)</b> The RPAs have liaised and agreed with the Applicant suggested additional viewpoint locations for consideration as part of the ASI. A copy of a plan showing the location of these (produced by the Applicant) has been provided separately as one of the Deadline 1 responses - it is understood the Applicant and NKDC have also done the same.	Recommendations from the RPAs were incorporated into the ASI plan and submitted at Deadline 1. A copy is attached to the Cover Letter (ExA.CL-D2.V1) for Deadline 2 also.

**Table 3 – Responses to BSIDB further information as requested during Issue Specific Hearing 2**

Theme	Consultee Comment (REP1-034)	Applicant Response
Biodiversity	BSIDB submitted information regarding an alternative to the existing proposals for compensatory tree planting. At the hearings, BSIDB stated that the Board were working with a local landowner and the Forestry Commission regarding a potential area of woodland and pond areas for educational purposes for local schools, located to the east of the Bicker Fen substation. BSIDB attached 3 no. maps showing the location of the proposed tree planting within the order limits and the proposed educational woodland in relation to the order limits. BSIDB understand that the Applicant is also in correspondence with the relevant landowner regarding their proposals	The Applicant thanks BSIDB for submitting this information. Discussions with the relevant parties is ongoing to reach a solution that satisfies BBC. The Applicant can confirm a discussion with the relevant landowner has been undertaken.  As stated at ISH2 the submitted oLEMP (document reference 7.8/PS-148) includes an area of land 0.42ha in size for replacement of the plantation woodland lost from Bicker Fen. The area of plantation lost from Bicker Fen Substation is 0.4ha.
Biodiversity	Map 1 with the text: <i>"Proposed area of compensatory tree planting. Bounded on three sides by IDB-maintained watercourses which have their own 9 metre easements to allow the IDB to maintain them, thereby potentially restricting the area of trees to be planted?"</i>	The area for tree planting is proposed on Figure 6.2- Landscape Strategy (document reference 6.2.6/PS-091) and OLEMP (document reference 7.8/PS-148). The proposal incorporates the 9m setback for the IDB watercourses. The area for planting shown on the BSIDB Map includes a larger area of proposed planting, and a wider buffer of approximately 25m.
Biodiversity	Map 2 with the text: <i>"Proposed area of compensatory tree planting"</i> and <i>"Proposed area of woodland proposed by the Forestry Commission and landowner"</i>	The Applicant thanks BSIDB for this information.
Biodiversity	Map 3 with the text: <i>"Proposed educational area with 'dipping pond'"</i>	The Applicant thanks BSIDB for this information.

**Table 4 – Responses to BBC response to the Change Request Application**

Theme	Consultee Comment (REP1-027)	Applicant Response
Biodiversity	Boston Borough Council in its LIR and its response to the Change Application for the works required at the Bicker Fen Substation have raised the loss of the trees at Bicker Fen Substation. This would be	The Applicant is working with BBC to try and lessen the impact of the tree removal. From a landscape character point of view the existing woodland W7 located immediately to the south of the National

Theme	Consultee Comment (REP1-027)	Applicant Response
	<p>harmful in terms of character, screening and ecology impacts.</p>	<p>Grid Bicker Fen Substation, is considered to be of low value with its function being primarily a mitigation planting associated with the planning permission for the Bicker Fen Substation which was approved in 2005 (under Boston Borough Council reference B/05/0046), and not associated with the traditional field pattern. It adds to the amount of tree cover in the landscape, helps interrupt and screen views, but is a recent man-made feature and only appreciated from a very limited number of public vantage points. In other words, it adds very little to the overall landscape character. In terms of ecology, whilst the woodland compartment has some localised structural value in terms of providing connectivity within and around the substation it is considered to have a limited value in terms of ecological functionality, mainly due to the woodland compartments age and current unmanaged state. Therefore, its partial removal is not considered to be materially harmful / or significant in terms of ecological function and landscape character.</p>
<p>Biodiversity</p>	<p>As a Borough, Boston has a limited amount of tree coverage and the proposals to remove trees would further reduce this and as a consequence we do not consider replanting them on the Energy Park, some distance away and within NKDC, is an appropriate solution. We do not object to tree planting on the Energy Park as an activity, but do not consider it resolves the issue relating to the loss of trees at the substation and within Boston Borough.</p>	<p>The Applicant is working with BBC to try and lessen the impact of the tree removal but would like to stress that the planting on the Energy Park which is under the control of the Applicant is provided as replacement planting for the loss of planting at Bicker Fen and therefore should be taken into account when considering the loss at Bicker Fen. However, it is noted that BBC's preference is for enhancements within its boundary and the Applicant is exploring ways to accommodate BBC's preferences for enhancement which would be in addition to the planting within the Energy Park.</p>
<p>Biodiversity</p>	<p>During the Issue Specific Hearing 2 Black Sluice IDB mentioned that a local landowner intended to plant an area of trees and the Examining Authority requested that details of this were submitted at this Deadline 1. This is an interesting initiative, but the Borough Council points out if this planting was going to happen in any case and the Heckington Fen Solar farm did not require the trees to be felled at the substation, the Borough would have benefited from additional tree planting in any case. As a result of the felling required at the substation, the Boston Borough will remain short of what it could have had in tree coverage.</p>	<p>The Applicant notes this response, and is working with BBC to reach a solution that satisfies their concerns, as correctly noted the trees are underway.</p>
<p>Biodiversity</p>	<p>The Examining Authority will decide if the details of the tree planting scheme and any support the Applicant can provide to it are</p>	<p>The Applicant notes this comment, and no further response is deemed necessary.</p>

Theme	Consultee Comment (REP1-027)	Applicant Response
	sufficient compensation and whatever mechanism is used to achieve this is suitable.	
Biodiversity	The Borough Council would like to suggest additional compensation is sought to offset the loss of the trees.	The Applicant notes this comment, and is considering how best to achieve this to BBC's satisfaction.
Biodiversity	The South East Lincolnshire Local Plan Policy 28 in section 3a ii and iv (appended to the LIR) encourages addressing gaps in the ecological network. Nationally policy encourages 'landscape scale solutions'.	The Applicant notes this comment, and is considering how best to achieve this to BBC's satisfaction.
Biodiversity	Within the farmed landscape there is screen planting around the Bicker Fen National Grid substation, a similar planting scheme is to be planted around the Triton Knoll substation, the South Forty Foot Drain is a Local Wildlife Site and there is a network of drains around the fields. In addition, if built, the two nearby sub 50MW solar schemes propose to plant hedges. Finally, as illustrated in the discussions on 'Best and Most versatile' agricultural land the land quality is not uniform and so there may be pockets of poorer land where the farming businesses may be considering using the Governments new agricultural support mechanism to convert them to biodiversity planting because the land maybe less productive than other land. The Heckington Fen solar park site (within NKDC) will also introduce a large area of new habitat.	The Applicant notes this comment and is working on a solution to satisfy BBC. Due to constraints of the Order Limits it will not be possible to incorporate additional land for planting provision, especially as the rights requested are for construction of the grid connection.
Biodiversity	The Borough Council is suggesting, within the confines of the red line of the DCO, that there may be an opportunity to connect these habitats together for the wider ecological benefit. The A17, the railway and the South Forty Foot Drain do severely disconnect the solar park from the wider substation area and bridging that would be difficult. However, potentially a length of hedge, a copse or a pond would help link habitats together to improve connectivity for wildlife, improving biodiversity across the wider area and improving resilience of species as mitigation of the works being undertaken in this area. Boston Borough Council would therefore request that these options are taken into account by the Examining Authority when assessing the proposals.	The Applicant notes this comment, and is considering how best to achieve this to BBC's satisfaction.
Biodiversity	BBC summarise the Change Request and make the following comments: One area labelled AW2 is screened by the existing substation and Boston Borough Council have no objections to it. The other area labelled AW1 requires the removal of trees that were planted when the substation was constructed in order to	The Applicant notes this comment. The Applicant agrees that the area to the south of the substation is very remote and this supports the Applicant's conclusion that the trees had limited screening purpose.

Theme	Consultee Comment (REP1-027)	Applicant Response
	<p>screen it which is disappointing. They are on the southern boundary and so visual impact is lessened by the fact that few people will venture here as it is very remote.</p>	
Biodiversity	<p>The amount of trees to be removed depends on what type of infrastructure is used. One type (Air insulated) requires a large amount, the other (Gas insulated) requires less and would be in a building. A row of oak trees on the frontage are to remain.</p> <p>The trees are not protected by a TPO and even if they were by virtue of the interplay between Article 14(1)(a)(iii)(cc) of the TPO regs 2012 and Part 15 Class B(a) of the GDPO development of up to 29 cubic metres would allow their removal. However, it seems this proposal requires permission as if it is not covered by the DCO an application under the planning act is required, and not the favoured option.</p>	<p>Gas-Insulated Switchgear (GIS) infrastructure is typically only offered in exceptional circumstances, and it is understood that an Air-Insulated Switchgear (AIS) is likely to be progressed by NGET due to their Electricity Act licence obligations in relation to public value for money of upgrading the network. However, until detailed design is further completed, both AIS and GIS are assessed to ensure both options remain available and have been adequately assessed in the ES.</p>
Biodiversity	<p>The submitted documents on the PINS website include a BNG calculation but the contents are blank. NSIPs will be required to produce 10% uplift from 2025. Given what is suggested on the solar park itself there could be an opportunity to show a 10% net gain despite the felling of these trees.</p>	<p>The BNG Calculation is available on request but it is not possible to upload Excel documents on the PINS website as they can be manipulated. A minimum of 10% BNG will still be achieved from the Energy Park for the whole of the Proposed Development and this is secured by Requirement 8 of the draft DCO (document reference 3.1). Deadline 2 confirms that 60% BNG in habitat units will be secured by the DCO.</p>
Biodiversity	<p>BBC relayed details from the consultation which balanced the direct adverse effects of the trees' removal with the proposed orchard planting on the solar park. However, the sites are some distance apart and the orchard does nothing for this localised impact. It would be welcomed if the loss of the trees could be mitigated for on the substation site. Therefore, Boston Borough Council would prefer the gas insulated option so fewer trees are felled and those that are felled are replanted on the substation to repair the localised harm.</p>	<p>Following consultation in summer 2023, a further area of tree planting was proposed on the Energy Park site to overcome this concern (in addition to the orchard). Furthermore, trees were added along the hedgerow on the northern border.</p> <p>As noted above, the final decision on the GIS solution will be taken by National Grid considering the circumstances at Bicker Fen Substation.</p>
Cumulative	<p>This amended proposal should also take into consideration the Temple Oaks and Beacon Fen solar farm projects in terms of additional infrastructure that may be required at the substation and cumulative impacts this may have.</p>	<p>The cumulative impacts are assessed so far as possible with the information available. The exact dates and locations of the connections at Bicker Fen have not been speculated in this application as it is for those projects to pursue those connections and relevant planning approvals if required. The Applicant submitted an Interrelationship with other Nationally Significant Infrastructure Projects (document reference ExA.IRReport-D1.V1/REP1-021) at Deadline 1 and will be submitting an updated cumulative assessment at Deadline 2, ES Technical Note- Updated Information on Cumulative</p>

Theme	Consultee Comment (REP1-027)	Applicant Response
Employment and Skills	<p>The amendments constitute a further extension within the Borough’s area, and so from an economic and social perspective, the Council would like to see the development doing as much as it possibly can to maximise the benefits for local people and businesses for hosting this infrastructure. Such examples could include local ‘low voltage’ grid upgrades; additional capacity being created within the substation (beyond that to serve the development) to enable further projects to have capacity to connect; options for enhanced skills offerings, particularly in relation to Net-Zero and energy for local people via colleges etc; promotional events and supporting communities to engage with the development during construction and during operation – e.g. skills fairs, procurement advice; use of social value engines to maximise benefits, and development of other schemes which can create a positive legacy for hosting this sort of infrastructure.</p>	<p>Projects (document reference ExA.ESN-Cumulative-D2.V1).</p> <p>Unfortunately, as this is a high voltage connection, it is connecting into the transmission network whereby low voltage connections are not available. Those low voltage connections would be managed by the Distribution Network Operator (DNO).</p> <p>An Outline Supply Chain, Employment and Skills Plan is included with the application (doc. ref. 7.12 / APP-243) and is secured by Requirement 16 of the draft DCO (doc. ref. 3.1). It is anticipated that the 36 roles likely required to construct the Additional Works at Bicker Fen will already be workers or contractors employed by National Grid; this is necessary due to the specialist high skilled role and training which is required when working on electricity infrastructure of this nature. However, in relation to the Applicant’s works, there is greater ability to influence the local community and skills/supply chain in this context; for example, based on discussions the Applicant has undertaken to date, firms and contractors often have apprenticeships and other opportunities which would be confirmed through submission of the final Supply Chain, Employment and Skills Plan submitted under Requirement 16 of the draft DCO.</p>

**Table 5 – Responses to NKDC response to the Change Request Application**

Theme	Consultee Comment (REP1-032)	Applicant Response
General	<p>North Kesteven District Council has already responded to the applicant in relation to the Change Request Application. A copy of the supplemental reply from AECOM ecology on behalf of NKDC along with the covering email are included. Please note that the reference to 4ha of woodland habitat in the AECOM reply should read 0.4ha</p>	<p>The Applicant notes this comment, and no further response is deemed necessary. NKDC’s comments were addressed in the Change Consultation Report (document reference PS-004) submitted with the Change Application in August 2023.</p>
Biodiversity	<p>AECOM reviewed the implications arising from the proposed minor order limits change in the vicinity of Bicker substation within the borough of Boston. This change would result in further localised permanent losses of semi-natural habitats adjacent to the substation. The time series of aerial imagery available via Google Earth shows these habitats to be of secondary origin and in the order of 18 years of age, originating c. 2005-2007 at the time of construction of the substation.</p>	<p>The Applicant notes this comment, and no further response is deemed necessary. NKDC’s comments were addressed in the Change Consultation Report (document reference PS-004) submitted with the Change Application in August 2023.</p>

Theme	Consultee Comment (REP1-032)	Applicant Response
Biodiversity	<p>The main additional habitat impact of note is the loss of 4ha [sic 0.4ha] of plantation woodland comprised of native tree species (the submitted plans indicate this would be over 50% of the affected woodland). The South East Lincolnshire Local Plan states (paragraph 7.5.11) that there is little woodland in South East Lincolnshire. AECOM do not agree with the assessment that the woodland is of local nature conservation value only. Given the scarcity of woodland in the Local Plan area, district/borough value would seem most appropriate in accordance with the method statement in Section 8.3 of Chapter 8 of the Environmental Statement (ES).</p>	<p>The Applicant notes this comment, and has proposed additional planting (0.42ha) in land it has control over for further planting. Following ongoing discussions with BBC this does not satisfy their concern and the Applicant is looking to overcome this with additional planting, but an area for this is not yet confirmed.</p>
Biodiversity	<p>Local Plan Policy 28 includes a presumption that existing woodland will be protected. If the need for the woodland loss can be demonstrated (after first considering options for impact avoidance and reduction), habitat compensation will be required. It would take a prolonged period of time to re-establish woodland of comparable structure and condition i.e. upwards of 18 years. Further, if the existing woodland was retained it would continue to mature and accrue biodiversity value. So, even after 18 years of growth, the new woodland would not have the same biodiversity value as the existing woodland if it was retained.</p>	<p>The Applicant notes this comment, and appreciates the presumption in the Local Plan Policy 28. Due to engineering constraints it is not possible to relocate the connection point. The Applicant notes AECOM's comment about the woodland maturity and confirms the required level of compensation will be determined by the Biodiversity Net Gain (BNG) assessment. The BNG metric calculation includes standard 'time to target condition' and 'difficulty in creation' multipliers for woodland habitats that will weight the amount of woodland planting required to compensate adequately for the loss of c.0.4ha of plantation woodland &lt;20yrs in age. Furthermore, the metrics 'trading rules' will ensure that any habitat created in compensation is of the same level of habitat distinctiveness or higher. The woodland at Bicker Fen Substation appears to have limited management since the area was planted.</p>
	<p>AECOM agree that the additional areas of land affected by the order limits change are of relatively low biodiversity value. And also that protected and notable species are not likely to be meaningfully affected. Therefore, AECOM agree that the wider conclusions of the ES remain as previously assessed. AECOM perceive no material impact on the conclusions of the assessment of cumulative effects.</p>	<p>The Applicant notes this comment, and no further response is deemed necessary.</p>
	<p>If the need for the woodland loss is accepted, then the required level of compensation should be determined by the Biodiversity Net Gain (BNG) assessment. This compensation should preferably be located in close proximity to the woodland loss, given the scarcity of woodland within the affected landscape. New woodland creation should not be at the expense of other habitats of existing biodiversity value.</p>	<p>The BNG assessment was updated to incorporate the loss of woodland at Bicker Fen Substation. It was subsequently updated for the Change Request Application submission to include the additional area of woodland added to the Energy Park as noted above. The Applicant is considering further opportunities to plant closer to the area of removal at Bicker Fen Substation. AECOM's prior comments were not incorporated into the BNG Calculation, as the Change Request Application documentation</p>

Theme	Consultee Comment (REP1-032)	Applicant Response
	NKDC reiterate the above statement in their covering letter. AECOM’s prior comments in relation to the BNG assessment should be considered when updating the assessment to include the additional habitat losses.	only focused on amendments as a result of the Bicker Fen Substation Change. A further revision of the BNG Calculation incorporating these comments is submitted at Deadline 2 (Appendix 8.12, Revision 3).
Cumulative	AECOM do not highlight any habitat or cumulative effect having reviewed the Appendix 8.13 supplemental ecology survey however as noted the effects of partial woodland loss will need to be incorporated into a revised BNG assessment but noting that compensation plantings should be in close proximity to the area of woodland loss.	The Applicant notes this comment. Appendix 8.13 – Further Extended Phase 1 Habitat Survey Report (PS-153) was submitted with the Change Request Application, along with a further Biodiversity Net Gain Calculation (Appendix 8.12, PS-128).
Cultural Heritage	In relation to archaeological matters, NKDC note that the consultation document references Requirement 12 of the draft Development Consent Order and the suggestion of dealing with impacts through the Written Scheme of Archaeological Investigation. NKDC will address this approach more generally in the LIR along with the current drafting of Requirements separately however in that context we have no further comments regarding the suggestion of adding AW1 and AW2 into the overall scope and coverage of the WSI.	The Applicant will continue to progress the implementation of the Written Scheme of Investigation: Evaluation with NKDC and their advisors. Due to the existing electrical infrastructure within the Bicker Fen Substation, which may have previously impacted on the archaeological resource and which also now limits the areas accessible for survey, it is unlikely that evaluation of the south end of the proposed cable route will be possible or productive. The opportunities for mitigation by design for the grid connection here are also considerably limited. It is therefore proposed that further evaluation/mitigation at the Substation takes the form of archaeological monitoring of construction groundworks (i.e., preservation by record, as opposed to preservation in situ).

**Table 6 – Responses to EA response to the Change Request Application**

Theme	Consultee Comment (REP1-035)	Applicant Response
Draft DCO	<b>Post Hearings submission</b> The Environment Agency was unable to attend the Hearings in September 2023. The EA has reviewed the recordings particularly in relation to whether the Environment Agency (EA) should be a consultee to Requirement 11 in respect of surface and foul water discharge – recorded as action point ISH1-AP11 [EV-004a]. The EA are aware that the only foul drainage required at the site will be during the construction phase (mentioned in paragraph 7.94 of Document 7.7 Outline Construction Environmental Management Plan [AS-026]) and have provided the Applicant with information on the permitting requirements for septic tanks, which is the method proposed. The EA advises that they will not comment on surface water drainage matters, as these fall under the remit of the Lead Local Flood Authority (LCC) and BSIDB. As such, the EA does not believe it is necessary to be a consultee to Requirement 11, as any matters arising from the foul drainage proposal can be dealt with through the environmental permitting process.	The Applicant notes this comment, and will reflect this in discussions with the RPAs on the discharging requirements. No changes are needed to Requirement 11 in this respect as the Environment Agency were not listed as a consultee or discharge body under Requirement 11.

<b>Theme</b>	<b>Consultee Comment (REP1-035)</b>	<b>Applicant Response</b>
Hydrology	The EA advice is that all critical infrastructure required to ensure the continuous running of the site is raised above the 1:1000 (0.1% annual probability) plus climate change flood level. This will ensure any equipment required to run the site should remain operational in the event of a flood of that design standard, which is considered to be a more extreme flood event. Providing this mitigation is incorporated into the development we would agree with the Applicant’s assessment of ‘no significant effects’ in respect of fluvial flood risk for the operational or decommissioning phases related to the Additional Works.	The Applicant notes this comment, and no further response is deemed necessary as the ES has assessed the development to operate within a 1 in 1,000 year flood event +20% for climate change.
Hydrology	The EA notes that their advice has not considered the risk of flooding from groundwater, drainage systems, reservoirs, canals or ordinary watercourses. Advice from other relevant flood risk management authorities in respect of flooding from these sources should be sought.	The Applicant notes this comment and confirms that BSIDB and LCC as the Lead Local Flood Authority have been consulted.