

**Nationally Significant Infrastructure Project: EN10123  
Heckington Fen Solar Park**

**Response to The Examining Authority's written questions and requests for  
information (ExQ2) issued on 19 December 2023**

**Prepared by Lincolnshire County Council**

**January 2024**

The following table sets out the Council’s response to the Examining Authority’s (ExA’s) written questions and requests for information (ExQ2) where a response from the County Council was sought.

ExQ2	Question	LCC Response
<b>1</b>	<b>General, miscellaneous and and cross-topic questions</b>	
GEN.2.1	<p>The revised National Planning Policy Framework is expected to be published shortly.</p> <p>All parties are invited to make comment on any relevant implications for the Application.</p>	<p>The revised National Planning Policy Framework (NPPF) was published on 19 December 2023 and, like the previous version, does not contain specific policies for nationally significant infrastructure projects as these are instead set out in National Policy Statements. However, the NPPF is still relevant and so should still be taken into account when making decisions on NSIP projects.</p> <p>The vast majority of the revisions and additions to the December 2023 version of the NPPF relate to housing delivery, land supply and local plans however a key and notable change which is relevant is the wording contained within paragraph 181 and in particular footnote 62 which states: <i>“Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. The availability of agricultural land used for food production should be considered, alongside the other policies in this Framework, when deciding what sites are most appropriate for development”</i>.</p> <p>In our view the inclusion and now specific reference to the need to recognise and consider the value of agricultural land for food production is a material planning consideration and (as also commented in response to LUS.2.4 below) reinforces the need to ensure that should the DCO be granted then it is necessary that measures are secured to ensure sheep grazing is undertaken on the land during the 40 year operational period (albeit this is not like for like replacement in terms of potential yield or value in terms of food production). It also reaffirms the need to ensure</p>

ExQ2	Question	LCC Response
		provision is made for early decommissioning and reinstatement of the land occur in the event the development ceases operating before the 40 year period sought.
GEN.2.2	<p>On 22 November 2023 the Department for Energy Security and Net Zero published updated versions of the draft National Policy Statements (NPS) for Energy (EN1 to EN5) which contain some changes to elements regarding the scope of critical national priority (CNP) infrastructure and the decision-making process for low carbon generation applications in general (amongst other changes), including for solar generating stations and related connections. These revised draft Statements have been laid before Parliament but are yet to be designated for the purposes of section 104 of the Planning Act 2008.</p> <p>All parties are invited to provide comments on the potential effect of changes in the November 2023 versions of the revised draft Energy NPS on matters related to the Proposed Development compared to the March 2023 versions of the Energy NPS.</p>	<p>The November 2023 versions of the EN-3 and EN-1 have been updated and include provisions which support the urgent need for new low carbon infrastructure by stating that all onshore and offshore electricity generation subject of the NPSs that do not involve fossil fuel combustion are now considered to be Critical National Priority (CNP) Infrastructure. This revision means that large scale solar projects such as the proposal at Heckington fall within the definition of CNP and that <i>‘the urgent need for CNP Infrastructure to achieving our energy objectives, together with the national security, economic, commercial, and net zero benefits, will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy’</i>.</p> <p>The transitional provisions at paragraph 1.6.2 of the latest draft of EN-1 reaffirms that <i>“any application accepted for examination before designation of the 2023 amendments, the 2011 suite of NPSs should have effect in accordance with the terms of those NPS”</i>. Therefore as a starting point we would highlight that the 2011 version of the NPSs remain in force until they are replaced. Whilst the November 2023 NPSs represent the Government’s latest energy-related policy, with technology specific policies relevant to solar PV in the NPS for renewable energy infrastructure (EN-3) (November 2023), they nevertheless remain undesignated and so like the previous versions, whilst they are important and relevant considerations and weight should be given to them, they do not yet carry full weight.</p>
GEN.2.4	The Applicant’s response to ExQ1 GEN 1.7 <a href="#">[REP2-077]</a> included some further detail regarding methodology for assessment of likely significant effect on some of the miscellaneous issues presented within Environmental Statement (ES) Chapter 18 <a href="#">[PS-077]</a> .	No comments offered or issues with the methodology or approach adopted by the Applicant in relation to these matters.

ExQ2	Question	LCC Response
	Could Lincolnshire County Council (LCC), North Kesteven District Council (NKDC) and Boston Borough Council (BBC) confirm if they have any comments regarding the methodology for Major Accidents and Disasters; Waste; Electric, Magnetic and Electromagnetic Fields; and Telecommunications as presented.	
GEN.2.5	An addition has been made to the outline Decommissioning and Restoration Plan <a href="#">[REP3-023]</a> at paragraphs 1.18.2 and 1.18.5 c) relating to monitoring reporting to Relevant Planning Authorities (RPAs) and the action to be taken in the event of a failure. LCC, NKDC and BBC are invited to comment on this additional provision within the Plan.	LCC welcomes the commitment to submit a monitoring report however, it is noted that this report will only be submitted every quarter. Whilst the risk of any new significant environmental impacts is expected to be low (on the basis that environmental controls will have previously been secured) there nevertheless remains a risk that impacts could be identified and actions implemented by the Applicant (without approval of the RPAs) for number of months without any prior scrutiny. Whilst LCC has no objection to the submission of a report every quarter we do feel the text should be strengthened to confirm that in the event any failures are identified then details of the actions/measures taken to address this will be discussed with the RPA immediately and that these are agreed with the eventual monitoring report still then being submitted quarterly.
GEN.2.7	An Equality Impact Assessment was submitted at D3 <a href="#">[REP3-031]</a> which includes consideration of persons or groups with a protected characteristic in order to inform the Examining Authority (ExA) how the Applicant has considered the Equality Act 2010 and provide information to assist the decision maker in applying the Public Sector Equality Duty. Could LCC, NKDC, BBC and any other Interested Parties provide any comments they wish to raise.	No specific comments offered on the EqlA and its conclusions.

ExQ2	Question	LCC Response
GEN.2.8	<p>At Issue Specific Hearing (ISH) 3 [Agenda Item 5b, <a href="#">REP3-038</a>] the Applicant provided an explanation as to why Protective Provisions under Schedule 13 of the DCO for Lincolnshire Fire and Rescue would be inappropriate. The outline Energy Storage Safety Management Plan was revised at D3 [<a href="#">REP3-013</a>] to include at paragraph 2.1.4 provisions for a fee made to Lincolnshire Fire and Rescue. LCC's response to ISH3 Action point 8 [<a href="#">REP3-052</a>] indicates that discussions are ongoing as to how the matter is best dealt with.</p> <p>The Applicant and LCC on behalf of Lincolnshire Fire and Rescue are asked to clarify:</p> <ul style="list-style-type: none"> <li>i) Agreed reasons why Protective Provisions for Lincolnshire Fire and Rescue would be an inappropriate method of securing such fees.</li> <li>ii) Details of how the fees were calculated.</li> <li>iii) Confirmation as to whether the Applicant's proposal for funding would be adequately secured within the outline Energy Storage Safety Management Plan as set out in Requirement (R) 7, or whether a Section 106 Agreement (S106) or similar obligation should be sought. If a S106 is necessary, confirmation if this could be achieved within the Examination timetable.</li> </ul>	<ul style="list-style-type: none"> <li>i). LCC disagrees that whilst the Energy Storage System (ESS) is not owned by LFR that it would not be appropriate to use a Protective Provision in this case. LCC's preference would be for the LFR provisions/fees to be secured as a Protective Provision as this is the same approach that has been promoted by the legal team for the Gate Burton NSIP project and agreed with LCC (see Part 13 of latest version of the dDCO for that project [<a href="#">REP5-018</a>]). The use of a Protective Provision to cover similar matters is also precedented in the <a href="#">Longfield Solar Farm Order 2023</a>, which includes Protective Provisions for the East of England Ambulance Service Trust. Therefore whilst LCC's preference would still be to secure this via Protective Provision as indicated in the response to iii) below so long as this is secured by some means we are content.</li> <li>ii). LCC has adopted a generic charge out rate of £90 per hour so this figure has been used to calculate the working day for reviewing the information and undertaking the necessary work to monitor and review the ESS. This hourly rate includes the associated additional costs as well as the salary for undertaking this work.</li> </ul> <p>In the first year of operation the LFR have calculated that in order to provide the necessary assurance that all the correct systems and measures are in place this would involve 21 days of Fire Service time. A minimum of one middle manager will be assigned to work on any ESS application/submission and due to the technical nature of the work, have built in resilience to the process and wherever possible will have 2 managers working on the application details. All work will be signed off by the department head which will then require dedicated time for the senior manager to engage, review and sign off the completed work. Due to the technical nature of the work, there may on occasions be a requirement to</p>

ExQ2	Question	LCC Response
		<p>commission work to support sign off of the more technical elements. At a current rate of £765 per day this equates to £16,665 in the first year.</p> <p>In subsequent years it would be necessary for an annual review of the site to take place which would be £1530 per annum. This accounts for 2 days site visit work (including vehicle and fuel costs) and time to prepare an assurance report.</p> <p>The Applicant and LCC have agreed these fees based on the above and the amounts reflect those also agreed with the promoter of the Gate Burton NSIP project and which LFR will be looking to secure in connection with all large scale solar projects where battery storage is proposed.</p> <p>iii). Notwithstanding our response to i) whilst we note the additional wording and commitments made in the outline Energy Storage Safety Management submitted at Deadline 3 <a href="#">[REP3-014]</a>, it is our understanding that monies cannot be secured by way of a Requirement or through a control/management plan (much like a planning condition imposed via the TCPA regime). Therefore if the funding is not embedded as a Protective Provision (like at Longfield) which is LCC's preferred position, then in our view this would need to be secured by way of a S106 Agreement. We have made the Applicant aware of this position and await their response. Should the decision be taken to progress a S106 we would hope to be able to agree Heads of Terms and submit these to the ExA before the end of the Examination and then work to have a signed/completed S106 with before the ExAs recommendation report goes to the SoS.</p>
GEN.2.11	The Applicant's response to ExQ1 BIO 1.5 <a href="#">[REP2-077]</a> clarifies that a major beneficial effect relates to hedgerow resource only and that Table 6.10 ES Chapter 6 <a href="#">[PS-059]</a> does not report tree resource during the	iii) LCC would consider it reasonable to apply the 'time to target condition' multiplier and assign a different effect significance which takes account of that maturity over time.

ExQ2	Question	LCC Response
	<p>construction phase as these effects were not deemed to be significant. Other non-significant residual effects are reported within Table 6.10.</p> <p>i) Could the Applicant provide further explanation why tree resource has been excluded from Table 6.10 or update it to include tree resource.</p> <p>In the Applicant’s response to part iv) of ExQ1 BIO 1.5 it is stated that residual beneficial effects are reported solely on the quantum of the proposed vegetation rather than their maturity. Considering this relates to an assessment of the significance of a landscape feature it is unclear why maturity has not been considered.</p> <p>ii) Could the Applicant provide an explanation of why they consider this is appropriate for the landscape assessment.</p> <p>iii) Could LCC, NKDC and BBC provide comment on the Applicant’s response to ExQ1 BIO 1.5 [<a href="#">REP2-077</a>].</p>	
<p><b>2. Biodiversity, Ecology and the Natural Environment</b></p>		
<p>BIO.2.2</p>	<p>The most recent update to the draft DCO [<a href="#">REP3-004</a>] includes an amendment to R8(c) which increases minimum Biodiversity Net Gain (BNG) of habitat units to 65% using the Biodiversity Metric 4.0.</p> <p>Statutory Biodiversity Metric tools and guides were released by the Department for Environment, Food and Rural Affairs on Wednesday 29 November 2023.</p>	<p>The following comments are offered in response to the questions aimed at the RPA’s.</p> <p>i). LCC does not see any significant issue or implications associated with the application of the latest BNG Metric and guidance as it does not differ significantly from the previous versions. Whilst it is accepted NSIPs are not yet required to demonstrate compliance with the statutory BNG requirements we do feel it appropriate for schemes such as this to provide opportunities to secure and enhance BNG nevertheless.</p>

ExQ2	Question	LCC Response
	<p>NKDC in their response to ISH3 Action Points [AP3, <a href="#">REP3-040</a>] notes that they have no objection to fixing the use of Biodiversity Metric 4.0 in R8.</p> <p>Longfield Solar Farm (Correction) Order 2023 includes amendments to DCO Schedule 2 R9(2)(a) in relation to the application of Biodiversity Metric 4.0.</p> <p>Could NKDC, BBC and LCC provide comment on:</p> <ul style="list-style-type: none"> <li>i) The implications of the recent BNG tools and guidance (noting that this is not yet statutory for NSIPs).</li> <li>ii) The amendments to R8 to include an increase to the minimum percentage of BNG to 65%.</li> <li>iii) Whether to fix the use of Metric 4.0 given the above</li> </ul>	<ul style="list-style-type: none"> <li>ii). LCC welcomes the Applicant’s revision to R8 in the dDCO submitted at DL3 [REP3-004] and commitment to secure a minimum 65% BNG rather than 60% as originally drafted however as stated in our response to Action Point ISH3-AP3 [<a href="#">REP3-052</a>] this is still a significant shortfall from the “over 100% in habitat units” claimed by the Applicant in their previous submissions. Whilst we appreciate the Applicant does not wish to over commit themselves at this stage given the detailed design of the scheme has yet to be confirmed, given the 40% difference between the two figures, we believe there is still scope for a higher % to be agreed that would strike a reasonable balance between giving the Applicant the flexibility they require whilst ensuring one of the key benefits.</li> <li>ii). LCC note the recent correction to the Longfield DCO however as stated in our response to Action Point ISH3-AP3 [<a href="#">REP-3-052</a>], LCC has no objection to fixing the use of Metric 4.0 within R8 given that to remove this (or to update to refer to a more generic term of ‘Statutory Metric’) could introduce future uncertainty in relation to complying with a fixed BNG figure.</li> </ul>
<b>3.</b>	<b>Compulsory Acquisition and Temporary Possession</b>	
CA.2.3	<p>Revision 5 of the Schedule of Negotiations with Undertakers and Landowners [<a href="#">REP3-010</a>] indicates that LCC do not wish to engage in negotiations during the Examination period.</p> <p>Could LCC:</p> <ul style="list-style-type: none"> <li>i) Provide reasoning for lack of engagement with the Examination in relation to CA and TP matters.</li> <li>ii) Provide an indication whether there are likely to be any significant constraints on landholdings and</li> </ul>	<ul style="list-style-type: none"> <li>i). Politically LCC does not support the use of best and most versatile land for the large scale solar and renewable energy projects and accordingly the development of land that it holds for such purposes. For these reasons, LCC as an affected landowner, has taken the stance not to engage with Applicants where proposals affect its land.</li> <li>ii). LCC does not consider there to be any significant constraints which would prevent the Rights sought by the Applicant being exercised should the SoS grant the DCO and the powers sought.</li> </ul>



ExQ2	Question	LCC Response
	<p>highways which would prevent the Rights sought by the Applicant.</p> <p>iii) Clarify if there are any areas of land that the Applicant is seeking to acquire Rights whether by CA or TP which LCC consider would not be needed?</p>	<p>ii). We note the Applicant's recent removal of Plot 299 from the project and can confirm that there are no other areas of LCC land over which the Applicant is seeking rights which would not be needed.</p>
<b>4. Development Consent Order</b>		
DCO.2.6	<p>An amendment to Schedule 14 (2) of the draft DCO <a href="#">[REP3-004]</a> increases the timeframe for Relevant Planning Authorities to give notice of decision on a Requirement from eight to ten weeks. The Applicant's post-hearing submission [Agenda item 6, <a href="#">REP3-038</a>] explains that no further changes will be made to the deemed discharge mechanism, referring to the 'critical national priority' status of solar in the final draft National Policy Statements.</p> <p>LCC, NKDC and BBC are asked to provide any further comments they may wish to raise on Schedule 14.</p>	<p>LCC welcomes the Applicant's agreement to extend the timeframe to give a decision on a Requirement from eight to ten weeks and with the exception of our comments on fees (set out below), we are content with the drafting of Schedule 14 as set out within the draft DCO submitted at DL3 <a href="#">[REP3-004]</a>.</p>
DCO.2.7	<p>ISH3 agenda item 6 referred to Schedule 14 (5) of the draft DCO <a href="#">[REP3-004]</a> (Fees) and the Applicant's post hearing submission/ action point 10 <a href="#">[REP3-038]</a> further responds to NKDC's comments regarding refunds to fees and notes that there is a mechanism to retain fees at paragraph 5(2)(b)(i).</p> <p>Schedule 14 (5)(1) refers to the 2012 Fee Regulations. The Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits)</p>	<p>ii) LCC agrees that a fee should be payable per Requirement and not per application given that an application could potentially seek to discharge several Requirements at the same time and therefore command only one fee. However, if there is a need to submit subsequent applications pursuant to a Requirement then this should also be subject of a fee and not be exempt.</p> <p>iii) LCC agree that annual indexation of fees from 1 April 2025 (as set out in Regulation 18A) should be reflected within the draft DCO. However, we do not agree with the Applicant's proposal to link the fee amount payable to that set out under regulation 16(1)(b) of the Fee Regulations (recently amended by <a href="#">Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site</a></p>

ExQ2	Question	LCC Response
	<p>(England) (Amendment) Regulations 2023 came into force on 6 December 2023.</p> <p>i) The Applicant is requested to amend the relevant wording of Schedule 14 (5) accordingly to reflect the 2023 Regulations.</p> <p>The Applicant, LCC, NKDC and BBC are asked to also consider:</p> <p>ii) The merit of fees being paid per Requirement rather than per application.</p> <p>iii) Whether the provision to introduce an annual indexation of fees from 1 April 2025 as set out in Regulation 18A should be reflected within the draft DCO.</p>	<p><a href="#">Visits) (England) (Amendment) Regulations 2023</a>). This fee has recently increased from £116 to £145 however this is still wholly insufficient. As stated previously [under Agenda Item 6 of <a href="#">REP3-052</a>] this project is much larger and of greater complexity than projects dealt with under the TCPA and so too are the Requirements. The fee amount proposed undervalues the time and importance of the work undertaken to discharge DCO requirements and so needs to be much higher. LCC will work with the applicant to suggest/propose alternative drafting in relation to Schedule 14(5) of the DCO with the hope this can be reflected in later versions and a position agreed before the end of the Examination.</p>
<b>5.</b>	<b>Historic Environment</b>	
HE.2.2	<p>The D3 update to the outline CEMP <a href="#">[REP3-019]</a> at paragraphs 7.71 to 7.75 includes provision for protection zones and historic building record of non-designated heritage assets.</p> <p>Could NKDC and LCC confirm if they are satisfied with this approach.</p>	LCC is content with the update and approach proposed/made.
HE.2.3	<p>R6 (2) of the draft DCO <a href="#">[REP3-004]</a> includes an additional criteria regarding the need for design details to take account of the results of archaeological investigations.</p> <p>Could LCC, NKDC and BBC confirm their agreement to the proposed additional wording.</p>	LCC is agreeable with the additional wording as this reflects that which we sought and used for R6(2) of the final draft DCO for Mallard Pass (see <a href="#">REP9-005</a> ).

ExQ2	Question	LCC Response
6.	<b>Land-use and Soils</b>	
LUS.2.2	<p>R8 LEMP and R19 Operational Environmental Management Plan (OEMP) of the draft DCO <a href="#">[REP3-004]</a> include provision for securing sheep grazing on the solar park site. In response to comments made by NKDC at ISH3/4 the Applicant has proposed an additional commitment within the outline OEMP [paragraphs 2.22 to 2.24, <a href="#">REP3-034</a>] relating to sheep grazing management.</p> <p>LCC, NKDC and BBC are asked to comment on this addition to the OEMP</p>	<p>LCC is content that should the DCO be granted then sufficient provision/commitments have been made in the OEMP and OLEMP and the draft wording of Requirement 19 to ensure sheep grazing is secured.</p>
LUS.2.4	<p>The Applicant has submitted a post-hearing submission for ISH3 agenda item 8 regarding use of Best and Most Versatile (BMV) agricultural land [Appendix 3, <a href="#">REP3-038</a>]. This includes submissions regarding cumulative assessment, changes to calculations of amounts of BMV affected on other solar farm projects in Lincolnshire, and explanation of consideration of significant effect terms.</p> <p>LCC, NKDC and BBC are asked to provide any comments they may wish to raise.</p>	<p>The following comments are offered in response to this question and also as our response to Action Point ISH3-AP13 identified for ISH3 <a href="#">[EV-018e]</a>.</p> <p>We have reviewed the Applicants submission and the arguments made are noted but do not alter LCC's concerns and comments made previously in respect of the impact and loss of BMV land as a result of this proposal. Whilst we accept some areas of Grade 1 and 2 BMV land have been removed from the development, a large proportion of the site still contains high grade BMV land and so disagree with the assertion this represents any prioritisation to the use of poorer quality land.</p> <p>In relation to comments regarding the weight and relevance of the Central Lincolnshire Local Plan policy on BMV, in our view this policy is entirely consistent with the approach taken by both draft EN-1 and EN-3 (including the most recent November 2023 versions) and also the amended NPPF in December 2023 and so should not be given minimal weight. As indicated in our response to GEN.2.1 the revised NPPF recognises the need to consider impacts on food production and in</p>

ExQ2	Question	LCC Response
		<p>doing so, in our view, reinforces the need to ensure that should the DCO be granted then it is necessary to ensure that measures are secured ensure that sheep grazing is undertaken on the land during the 40 year operational period (even if this is not like for like replacement in terms of potential yield or value in terms of food production).</p> <p>Finally, in respect of the <i>Applicant’s reference and reliance on IEMA guidance in terms of how they have assessed the significance of any effects in terms of loss of land and soils, in our view this guidance treats temporary and permanent effects as entirely binary and fails to acknowledge that some temporary effects are temporary in name only. This is out of step with other specialist guidance on assessing effects for EIA purposes – for example such as GLVIA3. In our view a 40 year lifespan is all but equivalent to an entire life time and, on a human scale, is hardly “temporary” in the common use of this word. As recognised by GLVIA3, effects of this longevity should be assessed as essentially permanent effects as that is how they are experienced in reality. In this case the applicant has committed to carrying out sheep grazing during the operational life of the development and whilst this is supported should the DCO be granted, this does not represent a like for like and although the soil resource may eventually become available again, its loss for 40 years is a significant and weighty adverse effect of the proposal. This is particularly so when assessed in combination with other projects in Lincolnshire which are all for similar timescales and as such should be assessed on this basis.</i></p>
<b>7.</b>	<b>Socio-economics</b>	
SE.2.1	The updated outline Supply Chain, Employment and Skills (SCES) Plan <a href="#">[REP3-015]</a> includes provision of an Apprenticeship Scheme amongst other initiatives and commitments, and states at section 3 that a fund to	Although this question was not specifically targeted to LCC, LCC does have an economic development interest and works with local businesses and training providers to develop and support opportunities for investment, employment and

ExQ2	Question	LCC Response
	<p>facilitate training and apprenticeships will be provided for the operational lifetime of the Proposed Development, the mechanism for which is to be agreed with NKDC and BBC following determination of the DCO. NKDC and BBC are asked to comment on the amendments to the outline SCES Plan including the amount of and approach to the funding for training and apprenticeships.</p> <p>The Applicant, NKDC and BBC are to clarify:</p> <p>i) How the proposed funding of £50,000 was calculated.</p> <p>ii) If the Applicant’s proposal for funding can be adequately secured within the outline SCES Plan to be secured by R16, or whether a Section 106 Agreement or similar obligation should be sought and if so, could its agreement be achieved within the Examination period.</p>	<p>economic growth across the County. We therefore offer the following comments at this stage</p> <p>i) No comment</p> <p>ii) Similar to our response to GEN.2.8(iii) we do not believe monies can be secured by way of a Requirement or through a control/management plan (much like a planning condition imposed via the TCPA regime) and so this would need to be secured by way of a S106 Agreement. We are aware that the other RPAs agree with this view and that the Applicant has now indicated their intention to pursue a S106 and that all three RPAs would be subject of that agreement given we all have an interest with regard to how the funding is spent. As a minimum we hope to be able to agree Heads of Terms and submit these to the ExA before the end of the Examination and then work to have a signed/completed S106 with before the ExAs recommendation report goes to the SoS.</p>
<b>8.</b>	<b>Traffic, Transport and Public Rights of Way</b>	
TT.2.1	<p>The Technical Note: Transport and Access relates to an assessment of a worst-case scenario of high sensitivity at Cowbridge Road, Bicker Drove and Vicarage Drove <a href="#">[REP3-030]</a> following discussion at ISH4 agenda item 8 and the Applicants post hearing submission <a href="#">[REP3-039]</a>.</p> <p>Could LCC provide comment on the Technical Note and advise if any further information is sought.</p>	<p>LCC welcomes the Technical Note and notes its conclusions and raises no further comments or issue on this matter.</p>