

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

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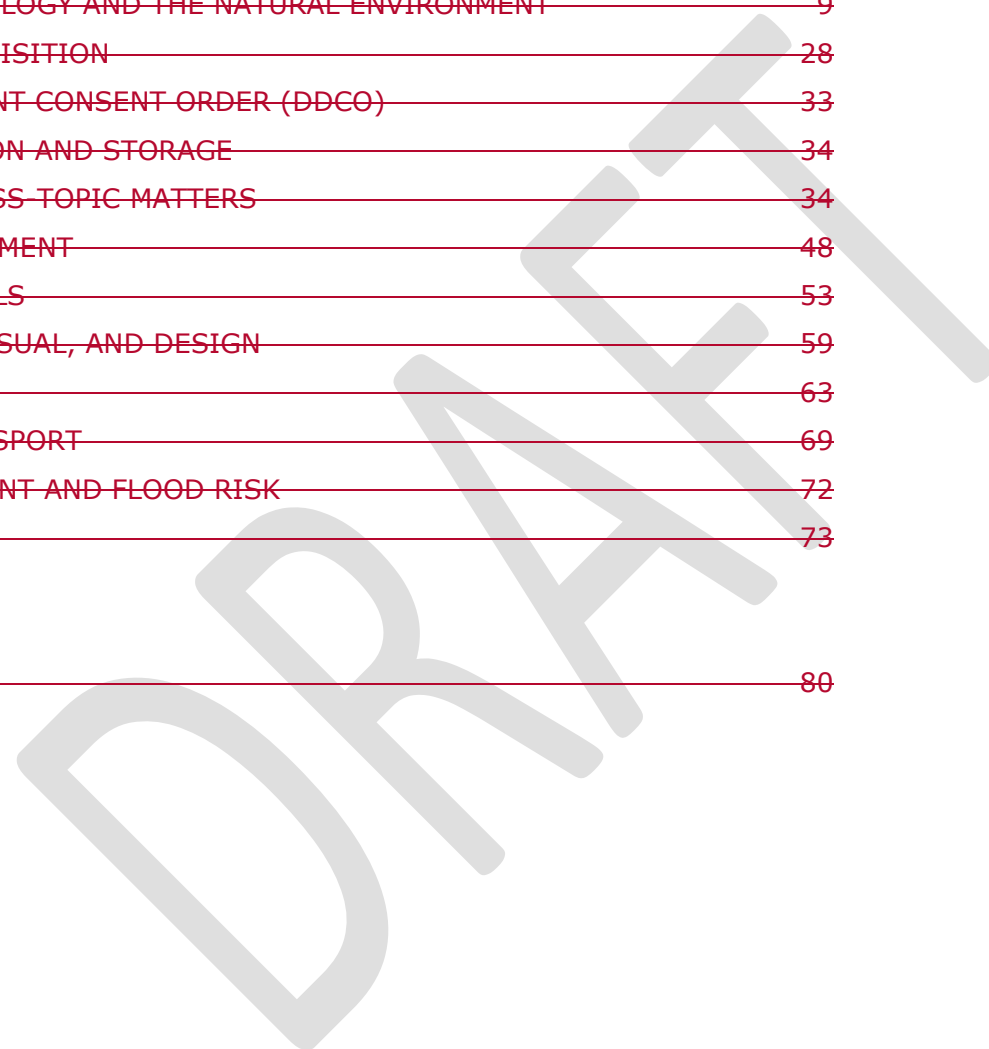
STATEMENT OF COMMON GROUND

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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 further comment, and
 - ~~"Not Agreed" indicates a final position of the parties that is not agreed, and~~
 - ~~"Unresolved discussion" indicates where there are different views or points are the subject of on-going discussion wherever possible to resolve, or refine, the extent of~~ disagreement between the principal parties on the specific matter.
- 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 there is agreement but also 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.

Local 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).

1.91.10 Table 3 covers the local policies which are considered important and relevant.

Planning History

- 1.101.11 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

~~1.111.12~~ 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.

~~1.121.13~~ It is agreed that the development proposed is an EIA development, and the submitted EIA assesses the realistic worst-case effects of the development.

~~1.131.14~~ 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 addressing 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*

21. *Community Orchard*

1.16 A ~~draft~~ schedule of DCO Requirements is ~~to be considered as part of the Examination~~ included in the draft DCO (document-reference: 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~~ has not been possible to fully resolve ~~in particular~~ in relation to the following elements (or sections within these):

- ~~Land use and agriculture (BMV land) – NKDC and LCC, including~~ cumulative effects with other NSIP solar proposals across Lincolnshire
- Landscape – LCC, over-reliance on hedgerow planting methodology and application of 'significance' in relation to 'moderate effect'.
- ~~Cultural heritage (archaeology) – NKDC, LCC, and BBC~~
- Cultural heritage (South Kyme Tower) level of harm not agreed but agreement that (but the public benefit test is met addressed) - 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~~ – Matters addressed

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.
1.2 Under Discussion <u>Agreed</u>	Appropriateness of habitat surveys	Considered appropriate. Survey for Quail will be undertaken in 2024. was a target species at Heckington – so every survey	Defer to other parties with expertise, notably Natural England, North Kesteven District Council’s ecological	<u>Assessment of impacts on scarce arable flora has been addressed and the Council agrees</u>	Defer to other parties with expertise, notably Natural

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		<p>commenced at dawn and every survey commenced with very careful listening right across the open agricultural landscape 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 especially given the known problems with the species outlined at para 8.2.9 of Appendix 8.10, dawn surveys for Quail were</p>	<p>advisors and Lincolnshire Wildlife Trust.</p>	<p>that additional survey work for quail can be secured by Requirement. 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.</p>	<p>England, North Kesteven District Council's ecological advisors and Lincolnshire Wildlife Trust.</p>

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		therefore deliberately combined with the early morning surveys for all other bird species.			
1.3 Under Discussion <u>Agreed</u>	Effects on specific species and their habitats, including European protected species (EPS)	<p>Requirements can satisfactorily deal with arable flora; ground nesting birds; and fencing. Natural England's process for badger licencing covers mitigation requirements. 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>Badger</p> <p>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 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</p>	Defer to other parties with expertise, notably Natural England, North Kesteven District Council's ecological advisors and Lincolnshire Wildlife Trust.	<p>The Applicant's proposed mitigation strategy for badger (Natural England badger licence) is acceptable. Not agreed, in particular in relation to badger.</p> <p>Previous concerns in relation to scarce arable flora have been addressed and the Council is satisfied that further surveys for quail can be secured by Requirement. A skylark mitigation strategy is still to be agreed, again secured by Requirement, and the need for further information on badger and deer gates in relation to security</p>	Defer to other parties with expertise, notably Natural England, North Kesteven District Council's ecological advisors and Lincolnshire Wildlife Trust.

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		<p>the siting of badger gates within fencing, if necessary.</p> <p>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).</p> <p>Whilst no further survey is proposed during the examination process, pre-commencement surveys will be undertaken and secured appropriately through the granting of the DCO.</p> <p>Security fencing would be high enough to exclude deer from within the solar arrays areas, but the ditch and grassland buffers throughout the site are being provided at such a scale that the landscape would remain permeable enough for deer to move through the</p>		<p>fencing can also be addressed by Requirement.</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 level.</p> <p>The need for further information on badger and deer gates in relation to security fencing.</p> <p>Details of the timings and arrangements of proposed sheep</p>	

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		<p>landscape—ensuring local deer populations—have—continued access to grassland margin habitats, and are able to move seasonally—through—the landscape. With no risk of being enclosed within solar array areas.</p> <p><u>Botanical Surveys (Arable Field Margins)</u></p> <p><u>Survey Approach: Methodology</u></p> <p>A Preliminary 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</p>		<p>grazing is also needed, due to use of pasture by ground nesting birds.</p>	

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		<p>2.3.4, 2.3.5 and 2.3.6 and Tables 2 and 3).</p> <p>Therefore, concerns 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 botanical surveyor who holds a FISC Level 6 survey accreditation with specialisms in arable flora.</p>			

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		<p>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>) and Wild Radish (<i>Raphanus raphanistrum</i> ssp. <i>raphanistrum</i>). These species were species of local concern with IAPA scores of 1-2 only.</p> <p>Of the 15 arable plots surveyed:</p> <p>4 plots scored 3 marks</p> <p>2 plots scored 2 marks</p> <p>1 plot scored 1 mark, and</p> <p>8 plots contained no species listed on the IAPA list.</p>			

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		<p>Section 2.5 of Appendix 8.6 sets out how May is an acceptable month for the survey of arable vegetation communities, 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).</p> <p>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 necessary for a site to achieve 'County' level importance within the IAPA framework.</p> <p>As such the Applicant is not</p>			

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		<p>proposing to undertake further survey work, or to update existing reporting due to the timing of the surveys undertaken.</p> <p>Impacts upon ground nesting birds</p> <p>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 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</p>			

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		<p>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 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	Grazing impact on ground nesting bird	The Applicant has submitted an oLEMP (doc. ref. 7.8), and an oOEMP (REP3-034)	No comment.	Details of the timings and arrangements of proposed sheep grazing is also needed, due to use of pasture by ground nesting birds. This matter is under	No comment.

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			which detail <u>stocking levels and grazing rotation patterns designed to maximise floral diversity, pollinator resource and opportunities for ground nesting birds.</u>		<u>discussion.</u>
<u>1.41.5 Under Discussion Agreed</u>	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 but the overall biodiversity net gain is positive and exceeds the 10% requirement. Further survey effort of the veteran tree can be undertaken once the land access is agreed.	<u>In relation to existing trees and hedgerows LCC have no significant comments but supports the replacement of trees lost around the Bicker Fen Substation as agreed with Boston Borough Council. Subject to LIR confirmation, this issue is under discussion.</u> <u>Outline Landscape and Ecological Management Plan</u>	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 adjusted.	Removal of trees at Bicker Fen Substation is unfortunate. Where opportunities to connect the main Energy Park site with Bicker Fen Substation ecologically is

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		<p>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, covered in the oLEMP.</p>	<p>updated at Deadline 3 satisfies this issue.</p>		<p>possible—this should—be explored—and implemented. Outline Landscape and Ecological Management Plan updated at Deadline 3 satisfies this issue, and BBC is comfortable that the mitigation is adequately secured in the oLEMP and given that the final scheme submitted under Requirement 8 must be in accordance with the outline scheme, and BBC have</p>

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		<p style="font-size: 48px; opacity: 0.3; transform: rotate(-45deg);">DRAFT</p>			<p><u>approval powers.</u></p> <p><u>The parties agree that the exact legal mechanism and/or contractual arrangements for the payment of the fee can be dealt with alongside submission and approval of the final plan, subject though to the OLEMP being amended to reflect that a s106 agreement will be used to fully discharge this matter. However, the parties will</u></p>

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					<p><u>work together to agree heads of terms during the examination period and proceed to enter into the section 106 agreement shortly thereafter.</u></p> <p><u>As an alternative, an appropriate contribution to a planting scheme within the Borough may be appropriate.</u></p>
<p><u>1.51.6 Under Discussion/Agreed</u></p>	<p>Habitat creation, enhancement and application of Net Gain</p>	<p>Positive with hedgerow and woodland creation, enhancement of existing features and application of Net Gain showing significant improvement on current</p>	<p><u>Subject to LIR confirmation, this issue is under discussion. LCC welcome the commitment made at Deadline 32 to secure a minimum 65% BNG however</u></p>	<p><u>NKDC welcomes the commitments made at Deadlines 2 and 3, and note that 65% BNG is now proposed and would be worded into</u></p>	<p>No additional comment further to the above.</p>

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		<p>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 submitted at Deadline 2 to be considered for at the next appropriate deadline.</p>	<p>this is still significantly less than that claimed within the application. LCC believes 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 of this scheme as promoted by the Applicant is secured/delivered., and recognise this is a benefit to the scheme, and higher than the 10% minimum BNG requirement. LCC recognise this can be given greater weight in the planning balance as a benefit with the commitment confirmed in Requirement 8 of the DCO.</p> <p>LCC has no issue with the Requirement fixing the use of Metric 4.0 / an exact metric given that to remove this reference could introduce future uncertainty in relation</p>	<p>a Requirement 8. The information presented is suitable to set terms of reference for agreement of the detailed plan later as a Requirement, however the Council’s position remains that it should be possible to exceed the 65% BNG specified from the information presented with the DCO application. NKDC consider 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 of this scheme as promoted by the Applicant is secured/delivered. AECOM note that the level of detail is sufficient to</p>	

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			<p><u>to complying with a fixed BNG figure.</u></p>	<p>understand what is being offered in broad terms, but it does not represent a full specification suitable to 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 be 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</p>	

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
				unclear, and the condition scores for the baseline and proposed habitats are not fully provided; including the 'Strategic Significance' weighting associated with some areas of ditch which are mapped as 'green infrastructure'.	
2. Compulsory Acquisition					
2.1 Under Discussion <u>Agreed / No comment</u>	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	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. <u>From a Highway perspective, LCC is content that the detail of the the-proposed highway improvements can be addressed through the DCO without utilising the Compulsory Acquisition powers.</u> Discussions remain ongoing with the landowner's agents regarding the parcel of land	No comment.	No comment.

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	streets, are necessary to facilitate or are incidental to the Proposed Development		owned by LCC (at plot 76B) on the grid connection route formal has been and no agreement has been reached.		
2.2 Unresolved	<u>LCC landownership</u>	<u>The Applicant has sought engagement with LCC's agents but have been notified they do not wish to engage at this time.</u>	<u>Discussions remain ongoing with the landowner's agents regarding the parcel of land owned by LCC (at plot 76B) on the grid connection route, however no formal representation has been made by LCC in its capacity as a landowner and at this time no agreement has been reached. Also refer to LCC response to ExQ2 CA.2.3 (Document reference TBC)</u>	<u>No comment.</u>	<u>No comment.</u>

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
2.2 — Under Discussion Not agreed	The Statement of Reasons and whether the powers sought are required for the development to which the order relates, whether they are legitimate, necessary, and proportionate and whether it is clear how the Applicant intends to use the land	Legitimate, necessary, and proportionate for delivery of a Nationally Significant Infrastructure Project. Clarity can be provided if unclear.	LCC is a landowner for the Highways network and also on the grid route. Discussions remain ongoing with landowner's agents. No representation made by LCC in its capacity as a landowner at this time. As per 2.1 above	No comment.	No comment.
2.3 — Not agreed 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	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	LCC is a landowner for the Highways network and also on the grid route. Discussions remain ongoing with landowner's agents. No representation made by LCC in its capacity as a landowner at this time. As per 2.1 above	No comment.	No comment.

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
	<p>justifies interference with the human rights of those affected</p>	<p>proportionate and necessary to facilitate the Proposed Development. Negotiations continue with landowners to ascertain the rights being sought are appropriate and to secure private agreements.</p>			
<p>2.4 Not agreed Under Discussion</p>	<p>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</p>	<p>The temporary possession powers are appropriate, and in line with precedent, for a Nationally Significant Infrastructure Project (NSIP) of this nature.</p>	<p>LCC is a landowner for the Highways network and also on the grid route. Discussions remain ongoing with landowner's agents. <u>No representation made by LCC in its capacity as a landowner at this time.</u> <u>As per 2.1 above</u></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
	whether the powers sought are compatible with human rights tests				
2.5 Under Discussion <u>Not agreed</u>	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 acquisition.	As per 2.1 above LCC is a landowner for the Highways network and also on the grid route. Discussions remain ongoing with landowner's agents. No representation made by LCC in its capacity as a landowner at this time.	No comment.	No comment.
2.6 Under Discussion <u>No comment</u>	The adequacy and security of project funding.	Relevant information is provided in the Funding Statement (doc ref 4.3, APP-019).	No comment. 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	The draft DCO is based on legal precedent and includes the appropriate structure, scope, provisions, requirements and	Under discussion, position to be confirmed in the final SOCG. Under Discussion.	Under discussion, position to be confirmed in the final	Under discussion, position to be confirmed in

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
	Consent Order including its structure, scope, provisions, requirements and protective provisions	protective provisions.		<u>SOCG.</u>	<u>the final SOCG. Under Discussion.</u>
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-024).	No comment.	No comment.	No comment.
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	Defer to other parties with expertise, notably North Kesteven District Council and Boston Borough Council's Environmental Health Officers.	<u>No comment. The Council agrees that a Requirement can be used to address control of emissions during construction and</u>	No comment.

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
		air quality as a result of the Proposed Development.		<p>operation.</p> <p>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 sensitive receptors, with the overall impact 'negligible'.</p>	
5.2 Under Discussion <u>Agreed / No comment</u>	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</p>	<p>Under discussion. LCC notes the Applicant's approach to the site selection process and recognises that this has been influenced taking into account</p>	<p><u>NKDC has agreed the flood risk sequential test parameters with the Applicant. NKDC notes the Applicant's</u></p>	No comment.

Reference and Status	Topic	Applicant’s Position	LCC’s Position	NKDC’s Position	BBC’s Position
		<p>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 <u>ISH-2 Summary of Oral Statement (REP1-020)</u> – that being that any alternative site would fail to comply as they are not deliverable in the same timescale.</p>	<p>a number of different factors including proximity to a grid connection; minimising impacts on designated sites (e.g. SSSI/Listed Buildings, etc). LCC cannot reach agreement on the use of Best and Most Versatile Land.</p>	<p>approach to the site selection process and recognises that this has been influenced taking into account a number of different factors including proximity to a grid connection; minimising impacts on designated sites (e.g. SSSI/Listed Buildings, etc). NKDC cannot reach agreement on the use of Best and Most Versatile Land, and the consideration of alternatives in the context of agricultural land considerations should be a particular focus for the ExA. Flood risk sequential test parameters agreed with The Applicant. However this topic remains under discussion as it remains for the</p>	

Reference and Status	Topic	Applicant’s Position	LCC’s Position	NKDC’s Position	BBC’s Position
		<p style="font-size: 48px; opacity: 0.3; transform: rotate(-45deg);">DRAFT</p>		<p>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-landowner alternative sites, and which should be a particular focus for the ExA.</p>	

Reference and Status	Topic	Applicant’s Position	LCC’s Position	NKDC’s Position	BBC’s Position
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. <u>The Operational Environmental Management Plan covers the permissive path for the lifetime of the project as well as securing the grazing.</u>	Welcome the addition of the permissive path <u>but</u> , question how much it will be used <u>and despite the proposed 40 year life maintains a</u> , preference for paths to be permanent. Links to other paths outside of the Order Limits would also be welcomed. Biodiversity Net Gain <u>benefits are also noted (subject to being secured), however LCC maintains that the commitment could be higher than that included in the dDCO – see comments in Section 1.5 above. 3. Further information is required on how the grazing is secured.</u> <u>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. Notwithstanding concerns about the loss of BMV land,</u>	Partial agreement as NKDC questions the farming benefit accruing from grazing, and whether this is tangible. <u>Whilst discussions are ongoing in relation to securing sheep grazing on the site, NKDC’s position is that this does not fully mitigate our concerns in relation to BMV impacts.</u> NKDC agrees that if the Flood Risk Sequential Test is accepted then the scheme would satisfy the ‘exception test’ community benefit element.	No comment.

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
			<u>LCC is therefore content at least with the mechanisms being offered to secure this benefit.</u>		
5.4 Under Discussion	Cumulative and in-combination effects with other projects and developments in the locality including other solar farm proposals in the region	<p>Cumulative and in-combination effects considered within the relevant EIA Chapters. The Applicant has addressed the cumulative projects in the Interrelationship Report <u>submitted at each relevant deadline.</u>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). 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</p>	<p>Totality of the projects across Lincolnshire will have been a key focus for LCC during the Examination, particularly in relation to loss of Best and Most Versatile land; and potential landscape impacts. <u>Update—LCC notes the Interrelationship Report for the list with any new schemes coming forward.</u></p>	<p>Partial agreement - Cumulative socio-economic and climate change are considered positive. Cumulative ALC and farming implications across all projects are negative. <u>NKDC notes the submission of the Interrelationship Report for schemes coming forward noting cumulative adverse effects in relation to agricultural land across Lincolnshire and cumulative adverse LVIA effect in relation to Beacon Fen Energy Park. It is noted and agreed that cumulative effects associated with other projects are</u></p>	No comment.

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
		<p>economic — environmental impact.</p> <p>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.</p>		<p>outside of the Applicant's control. Table 25.1 of the NKDC LIR contains a summary of cumulative effects. 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.</p>	
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 <u>Under Discussion/Agreed</u>	Fire and safety hazards	Considered within a separate Outline Energy Storage Safety	LFR seeking Section 106 or another mechanism such as	No comment other than to note that NKDC	No comment subject to

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/ No comment	associated with storage technology	<p>Management Plan. This is a certified document, secured under Requirement 7 of the DCO.</p> <p><u>The Applicant has included a provision in the outline Energy Storage Safety Management Plan [REP3-013], at paragraph 2.1.4, which commits to the requested provisions for LFR in the context of a familiarisation exercise and payment from the Applicant, as well as a monitoring fee for the benefit of LFR for the lifetime of the scheme.</u></p> <p><u>The parties agree that the exact legal mechanism and/or contractual arrangement for the payment of the fee can be dealt with alongside submission and approval of the final plan.</u></p>	<p>protective provisions (LCC has provided an example) to monitor ESS systems. This dialogue is ongoing and will be clarified in later additions of the DCO.</p> <p><u>LCC agrees that the safeguards for LFR are adequately secured in principle for the Project within the outline Energy Storage Safety Management Plan [REP3-013] given that the final scheme must be in accordance with the outline scheme under the terms of Requirement 7 of the DCO. LCC, in consultation with LFR and NKDC, are the approval body for Requirement 7 so there is adequate control.</u></p> <p><u>The parties agree that the exact legal mechanism and/or contractual arrangements for the payment of the fee can be dealt with alongside submission and approval of</u></p>	will be making written submissions regarding the need to consider the use of Lithium-Iron Phosphate batteries.	Lincolnshire Fire and Rescue agreement of the provisions.

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
			<u>the final plan.</u>		
5.8 Under Discussion <u>Agreed / No comment</u>	Greenhouse gas emissions arising during all phases	<p>Considered within Chapter 17.</p> <p>To confirm we have not assessed the energy required for disposal / recycling due to the uncertainty of processes and quantity of material 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 methodologies to be consistent with the conservative</p>	<p>Not querying the conclusions of Chapter 17, similarly to NKDC, if recycling is included in the assessment and would this change overall conclusions. <u>No comment.</u></p>	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 time use in the development, and then recycled post-development.	No comment.

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		<p>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.</p> <p>Recycling is covered in the Outline Decommissioning and Restoration Plan (document reference 7.9).</p>			
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

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
					energy, as such BBC has no comment.
5.11 Under Discussion <u>No further comment</u>	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 <u>No further comment</u> Under Discussion	Policy and legislation including emerging National Policy Statements (NPS).	ES complete and supported by Statement of Need and Planning Statement. NPS considered in Updated Statement of Need and Planning Statement with the Change Application. At Issue Specific Hearing 2, the Applicant explained that Best and Most Versatile land accounts for 42% of England	Policies will be detailed further in the LIR. An appendix of policies to be added to a further iteration of this SOCG. This issue is under discussion <u>Table 3 considers the local policies considered important and relevant.</u> <u>In relation to the November 2023 EN1 and EN3 guidance refer to LCC response to</u>	<u>Table 3 identifies the local policies considered important and relevant. The NKDC LIR and WR discusses relevant policy to be engaged in relation to each technical chapter and notes particular conflict with national and local policy and guidance</u>	No comment.

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		<p>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 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>EXQ2 question GEN.2.2 submitted at DL4 (Document ref tbc)</p>	<p>relating to BMV land; including in relation to the November 2023 EN1 and EN3 guidance. The NKDC LIR discusses relevant policy to be 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</p>	

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				<p>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 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 and High Court challenges	The DCO is based on various made <u>and emerging</u> Orders across the energy sector and, more specifically, solar DCO projects such as Longfield, Little	Under review <u>with no further schemes to add at Deadline 4.</u>	To be agreed. No High Court challenges to comment on.	No comment.

Reference and Status	Topic	Applicant’s Position	LCC’s Position	NKDC’s Position	BBC’s Position
		Crow DCO, and Cleve Hill <u>and those projects currently in Examination within Lincolnshire.</u>			
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.
6. Historic Environment					
6.1 <u>Under Discussion</u> <u>No further comment</u>	Effects on designated and non-designated heritage assets and their settings	Considered in Chapter 10. 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	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. NKDC position is that the proposals cause Degree of lower end ‘less than substantial harm’ to setting / significance of South Kyme Tower by Conservation Officer (scheduled and listed) but that the public benefit test would be met. Otherwise agree with	No comment.

Reference and Status	Topic	Applicant’s Position	LCC’s Position	NKDC’s Position	BBC’s Position
		<p>indication that the Tower was positioned or orientated to ensure its prominence 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 not considered key views of the asset.</p> <p>The geographical and topographical context of the tower, and the current potential</p>		<p>ES conclusions. S</p>	

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
		<p>range of the views towards and from it, would not be changed. The scheme he 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. This is covered in REP3-039.</p>			
<p>6.2 Under Discussion <u>No further comment</u></p>	<p>Appropriateness of schemes of investigation for archaeology</p>	<p>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 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</p>	<p>Key areas to be considered include archaeology — LCC Archaeologist advice that trial trenching is completed.</p> <p>Sufficient trenching completed on Energy Park to inform a Mitigation Strategy. <u>LCC agreeable to further trenching along cable route being secured as Requirement if not completed before the close of the Examination.</u></p>	<p><u>NKDC note the submission of REP2-048 and REP2-036 in relation to energy park archaeological mitigation areas and initial archaeological assessment of parts of the cable corridor. This has advanced the understanding of impact of significance along the cable corridor and the Council is satisfied that the archaeological mitigation strategy for the project can be secured by</u></p>	<p>BBC notes the Applicant is undertaking trial trenching on the cable grid route where access is available. Subject to Historic England and Heritage Trust Lincolnshire agreement BBC offer no further comment. BBC agreeable to further trenching along</p>

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
		<p>Requirement 12 of the DCO. Mitigation is secured by the Requirements and therefore should it not be possible to complete trial trenching prior to determination there is sufficient protection in the Requirements to ensure it is completed prior to commencement.</p>		<p>Requirement on that basis. 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 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>cable route being secured as Requirement if not completed before the close of the Examination.</p>

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
7. Land Use and Soils					
7.1 Under Discussion Agreed	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. LCC have no comments on the appropriateness and accuracy of the methodology and the results of the survey work undertaken.	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 near 50/50 proportions of BMV to non-BMV.	No comment.
7.2 Not agreed Under Discussion	Loss of BMV agricultural land including	The Savills Report (APP-220) provides useful context to why the land is not producing food	Refer to LIR paragraph 7.8.14 [REP1-028] and Written Representation [REP2-104].	Not agreed. NKDC highlight that there is a near 50/50 distribution	No comment.

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
	<p>implications for food production and supply</p>	<p>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 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</p>	<p><u>Nearly 50% of the total area of the main Energy Park comprises of BMV land and would take this land out of productive arable use for 40 years. The loss of this high-grade land is not only of significant concern to LCC in respect of this specific project and location but is also of significant concern given the cumulative and in-combination effects of such loss when taking into account other NSIP scale solar developments that are also currently being promoted across Lincolnshire that are similarly seeking to use high-grade agricultural land.</u></p> <p><u>Also refer to LCC response to ExQ2 LUS.2.4 (also response to Action Point ISH3-AP13) (Document reference TBC) Subject to LIR confirmation, this issue is under discussion. Refer to LIR paragraph 7.8.14 [REP1-028]</u></p>	<p>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. NKDC consider that the Applicant has not proven that the 'need' to develop BMV land has been clearly</p>	

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
		<p>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 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.</p>	<p>and Written Representation [REP2-104].</p> <p>Nearly 50% of the total area of the main Energy Park comprises of BMV land and would take this land out of productive arable use for 40 years. The loss of this high-grade land is not only of significant concern to LCC in respect of this specific project and location but is also of significant concern given the cumulative and in-combination effects of such loss when taking into account other NSIP scale solar developments that are also currently being promoted across Lincolnshire that are similarly seeking to use high-grade agricultural land.</p>	<p>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. <u>Key areas to be considered by the ExA will be the weight afforded to best and most versatile land in planning balance and whether suitable mitigation through grazing can be secured albeit NKDCs position in principle is that mitigation does not overcome impacts on BMV land.</u></p> <p>Key areas to be considered include weight afforded to best and most versatile land</p>	

Reference and Status	Topic	Applicant’s Position	LCC’s Position	NKDC’s Position	BBC’s Position
				in planning balance and mitigation through grazing.	
7.3 Under Discussion <u>Agreed</u>	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 and Requirement 19 which secures the Operational Environmental Management Plan (the outline of which explains the detail of sheep grazing).	<p>As above plans for mitigation of BMV impacts through grazing are not yet defined/agreed. Subject to LIR confirmation, this issue is under discussion.</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. Notwithstanding concerns about the loss of BMV land, LCC is therefore content at least with the mechanisms being offered to secure this benefit.</p>	<p>As above plans for mitigation of BMV impacts through grazing are not yet defined/agreed. NKDC note that the applicant has made provision/commitments in the OEMP and OLEMP and the draft wording of Requirement 19 to secure sheep grazing, the mechanism for which is agreed.</p> <p>Notwithstanding concerns about the loss of BMV land, NKDC is therefore content at least with the mechanism being offered to secure this mitigation.</p>	No comment.

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
7.4 No comment	Proposals for soil stockpiles and bunds	These will largely be in areas determined by final track positions and in proximity to where the soil is removed. Further details will be added to the Outline Soil Management Plans which is now a standalone plan, and requirement of the DCO at Deadline 2 (document reference 7.15).	No comment.	No comment. NKDC agrees without prejudice that a Soil Management Plan can be secured by Requirement.	No comment.
7.5 Under Discussion	Soil Management Plans	Outline Soil Management Plans (Energy Park and Cable Route) are included (document reference 7.15).	Further review of the Outline Plans to be completed by LCC for Deadline 5.	Dealt with by Requirement, further discussion on additional Requirement with the Applicant (without prejudice to the Council's position regarding BMV).	No comment.
7.6 Under Discussion	Site restoration following decommissioning	Outline Decommissioning and Restoration Plan are required as part of the certified documentation pack.	LCC has not yet agreed proposals for early decommissioning ahead of the 40 year operational time limit in the event of cessation of energy generation. Further review of the Outline Plans to be completed by LCC for	Dealt with by Requirement the terms of which are still under discussion. NKDC has not yet agreed proposals for early decommissioning ahead of the 40 year	No comment.

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
			<u>Deadline 5.</u>	<u>operational time limit in the event of cessation of energy generation.</u>	
8. Landscape and Visual, and Design					
8.1 Under Discussion <u>No comment</u>	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. <u>No comment.</u>	No comment, agree with the ES.	No comment.
8.2 Under Discussion <u>Not agreed</u>	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 range landscape.	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.
8.3 Under Discussion <u>Not agreed</u>	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.	<u>Refer to LIR [REP1-028] and Summary of Oral Representation at ISH4 [REP3-052]</u> <u>Agree with LVIA in that there would be negative effects. The area is predominantly flat which would help to limit long distance views, however from</u>	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
			<p>close range the LVIA identifies a significant change to high and medium sensitivity receptors. There is an over reliance upon hedgerow planting for mitigation (which are not a common characteristic of the site and the immediate locality) and hedgerows of 3m to 5m would introduce a significant vertical element into views which are currently long and open and characteristic of the area. The effect would be most notably experienced by users of country lanes to the north of the site where their views to the south would be foreshortened by very high hedges which are out of character for the area. Subject to LIR confirmation, this issue is under discussion.</p>		
<p>8.4 <u>No comment</u> Under Discussion</p>	<p>Glint and glare</p>	<p>Considers residential properties, road, rail, air traffic and national trails. Glint is</p>	<p>No comment. Subject to LIR confirmation, this issue is</p>	<p>No comment, agree with the ES.</p>	<p>No comment.</p>

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
		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.	under discussion.		
8.5 Under Discussion <u>Not agreed</u>	Mitigation proposals	The proposed mitigation planting has the potential to considerably reduce significant effects, which would be geographically highly limited, both in character and visual terms.	Subject to LIR confirmation, this issue is under discussion. <u>See 8.3 above.</u>	To be agreed by Requirement (Outline Landscape and Ecological Management Plan – document reference 7.8).	No comment.
8.6 No comment <u>Under Discussion</u>	The Rochdale Envelope in relation to design and scale parameters and flexibility	ES complete including where Rochdale Envelope principle required.	No comment <u>Subject to LIR confirmation, this issue is under discussion.</u>	No comment	No comment.
8.7 No comment <u>Under Discussion</u>	Consideration of good design and relevant guidance for all above ground structures including solar	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	No comment <u>Subject to LIR confirmation, this issue is under discussion.</u>	No comment	No comment.

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
	panels, substations and storage equipment	the grid connection to Bicker Fen Substation.			
8.8 No comment <u>Under Discussion</u>	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 built into Requirement 6 for submission of the final design details.	No comment – no objection to securing by Requirement. 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 <u>Agreed</u>	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 result in beneficial effects in terms of employment, economic contribution, and business rates in all relevant phases of	No specific comment but LCC do wish to be party of any legal agreement /contractual arrangement used to secure the funding and to be involved in discussions around how this is spent given we also have an economic development	No comment other than to note that NKDC agrees that the construction and operational phases will deliver socio-economic benefit but highlight some negative impact on accommodation	Potentially positive during construction, otherwise neutral. <u>BBC agrees that the oSCES [REP3-015] adequately</u>

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
		<p>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. Reference 7.12). The Applicant has included a provision in the updated outline Supply Chain, Employment and Skills (SCES) Plan [REP3-015] to include further detail on an apprenticeship scheme amongst other initiatives, and a fund to facilitate training and apprenticeships for the operational lifetime of the development. The fund is for £50,000 per annum (index linked).</p>	<p>interest and work with local businesses and training providers to develop and support opportunities for investment, employment and economic growth across the County.</p> <p>We agree the exact legal mechanism and/or contractual arrangements for the payment of the fee can be dealt with alongside submission and approval of the final plan.</p> <p>Also refer to LCC response to EXQ2 question SE.2.1 submitted at DL4 (document reference TBC)</p>	<p>availability during construction (to tourists).</p> <p>Partially agreed some negative impact on accommodation availability during construction (to tourists).</p> <p>NKDC agrees that the oSCES [REP3-015] adequately secures the principles of the apprenticeship scheme including the principle of a fund to facilitate training and apprenticeships to a value of £50,000 per annum (index linked) for the lifetime of the scheme, given that the final scheme submitted under Requirement 16 must be in accordance with the outline scheme and NKDC have approval powers.</p>	<p>secures the principles of the apprenticeship scheme including the principle of a fund to facilitate training and apprenticeships to a value of £50,000 per annum (index linked) for the lifetime of the scheme, given that the final scheme submitted under Requirement 16 must be in accordance with the outline scheme and BBC have approval powers. The</p>

Reference and Status	Topic	Applicant’s Position	LCC’s Position	NKDC’s Position	BBC’s Position
		<p><u>The parties will work together to agree heads of terms for the s106 agreement during the examination period and proceed to enter into the section 106 agreement shortly thereafter.</u></p> <p><u>The parties agree that the exact legal mechanism and/or contractual arrangement for the payment of the fee can be dealt with alongside submission and approval of the final plan.</u></p>		<p><u>NKDC suggests that the mechanism of a s106 is referred to in the oSCES plan as the appropriate 'legal agreement' to be entered into between the parties. The oSCES should not defer the method of securing the payment to post-determination, as currently drafted.</u></p> <p><u>The parties agree that the exact legal mechanism and/or contractual arrangements for the payment of the fee can be dealt with alongside submission and approval of the final plan, subject though to the oSCES being amended to reflect the need for a s106 Agreement to discharge this matter.</u></p>	<p><u>parties agree that the exact legal mechanism and/or contractual arrangements for the payment of the fee can be dealt with alongside submission and approval of the final plan, subject though to the oSCES being amended to reflect the need for a s106 Agreement to discharge this matter. However, the parties will work together to agree heads of terms during</u></p>

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
				<p><u>However, the parties will work together to agree heads of terms during the examination period and proceed to enter into the section 106 agreement shortly thereafter.</u></p>	<p><u>the examination period and proceed to enter into the section 106 agreement shortly thereafter.</u></p>
9.2 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 typically traffic management</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	No comment.

Reference and Status	Topic	Applicant’s Position	LCC’s Position	NKDC’s Position	BBC’s Position
		<p>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 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>		discussion.	

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
10. Traffic and Transport					
10.1 Under Discussion <u>Agreed</u> / <u>No comment</u>	<p>Access proposals</p> <p><u>Effects on the local and strategic road networks, rail network and public rights of way (considered under 10.3)</u></p> <p><u>Effects on non-motorised users, public rights of way and bridleways</u></p>	<p>Main site entrance approved via previous application and still represents the best solution to avoid the nearest neighbours. Scheme amended <u>prior to submission</u> to incorporate Triton Knoll access track to avoid Bicker village 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>At this stage, t Traffic and transport, subject to agreement with Construction Traffic Management Plan and Construction Environmental Management Plan this is considered neutral with no fundamental concerns. There is an impact but can be dealt with through Requirement. Further detail including in the <u>LIR and Responses to First Written Questions.-</u></p>	No comment.	No comment subject to LCC agreement.
Under Discussion	Effects on the local and strategic road	Numbers are below 10% threshold of A17. There will be an increase in vehicles using	Refer to LIR. See 10.1 above	No comment.	No comment.

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
	networks, rail network and public rights of way (considered under 10.3)	the local highway network during the 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. No impact on rail network anticipated.			
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 Foot Drain.	Refer to LIR. See 10.1 above	No comment.	No comment.
11. Water Environment and Flood Risk					
11.1 Under Discussion Agreed / No comment	Flood Risk Assessment (FRA) including identification of risk zones and	Considered as part of Chapter 9, and a separate appendix.	Refer to LIR. No comment.	Sequential test noted above, to be agreed interpretation of sequential test and alternatives. Exception	No comment.

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
	climate change allowance			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.	
11.2 Under Discussion <u>No comment</u>	Surface water drainage strategy	Considered as Part 2 of the FRA which is an appendix to Chapter 9. Predominantly swales at field edges.	No comment. 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.
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 <u>Agreed</u>	The	All environmental constraints	Methodology of LVIA as	<u>NKDC confirm that the</u>	No comment.

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
/ No comment	Environmental Statement including its scope, methodology, baseline, likely significant effects, in-combination effects, mitigation measures and management plans.	<p>and sensitive receptors relevant to the determination of the application have been considered in the application plans and documents.</p> <p>The submitted EIA assesses the realistic worst-case effects of the development.</p>	outlined above.	<p><u>methodology, likely significant effects, in-combination effects for all chapters is agreed. REP2-048 and 2-036 now advance the baseline evidence in relation to archaeology.</u></p> <p><u>NKDC agree that in principle Requirements can be drafted to agree mitigation measures and management plans. Regardless of the discussions in relation to mitigation of impacts in relation to BMV land (sheep grazing), NKDC does not agree that this will fully mitigate those impacts. NKDC agrees that Requirements can address remaining archaeological and ecological matters including evidence of</u></p>	

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
		<p style="font-size: 48px; opacity: 0.3; transform: rotate(-45deg);">DRAFT</p>		<p>ability to deliver the <u>BNG</u> amounts as predicted (min. 65%). NKDC confirm that the methodology, likely significant effects, in combination agreed, the exception is the baseline for archaeology.</p> <p>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 <u>BNG</u> amounts as predicted.</p>	

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
12.2 Under Discussion No further comment	The need case, site selection and consideration of alternatives.	<p>ES complete and considers alternative layouts and back check review on other sites. Planning Statement includes Need Case.</p> <p>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.</p>	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 <u>albeit it maintains that additional areas of BMV land could have been removed.</u>	Refer to Section 5.10 above.
12.3 Agreed	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	No comment.

Reference and Status	Topic	Applicant's Position	LCC's Position	NKDC's Position	BBC's Position
				owing to timescales of submission. Two further TCPA 1990 sub-50MW solar farms at Little Hale Fen (live planning application) and Screddington (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 <u>Not resolved</u>	Planning policy compliance.	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 <u>and WR</u> for discussion of policy compliance for specific technical areas.	No comment.
12.5 Agreed	The dDCO, its Articles and	Further details available in the	Refer to Section 3 above.	Refer to Section 3 above. Under	<u>Refer to Section 3</u>

STATEMENT OF COMMON GROUND

RELEVANT PLANNING AUTHORITIES

Reference and Status	Topic	Applicant’s Position	LCC’s Position	NKDC’s Position	BBC’s Position
	Requirements.	Explanatory Memorandum.	Under Discussion.	Discussion.	above. Under Discussion. No comment.
12.6 Agreed / No comment	Any other matters raised by interested local residents, Members of the Council and internal consultees.	Agri-voltaics considered by subsequently ruled out. Compromise is reducing the Order Limits and areas remaining in arable agriculture along the southern and western boundary.	No further comment in addition to the above.	No comment. See above in relation to cumulative effects and fire risk (battery selection) raised by NKDC Members in debate of the NKDC LIR. These matters will be set out in the Written Representation.	No comment.

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Table 3 – Local Policies considered important and relevant

<u>South East Lincolnshire Local Plan 2011-2036 (adopted March 2019)</u> <u>(SELLP)</u>		<u>BBC LIR</u>	<u>LCC LIR</u>
<u>Policy 1</u>	<u>Spatial Strategy</u>		✓
<u>Policy 2</u>	<u>Development Management</u>	✓	✓
<u>Policy 3</u>	<u>Design of New Development</u>		✓
<u>Policy 4</u>	<u>Approach to Flood Risk</u>		✓
<u>Policy 28</u>	<u>The Natural Environment</u>	✓	✓
<u>Policy 29</u>	<u>The Historic Environment</u>	✓	✓
<u>Policy 30</u>	<u>Pollution</u>	✓	✓
<u>Policy 31</u>	<u>Climate Change and Renewable and Low Carbon Energy</u>	✓	✓
<u>Policy 33</u>	<u>Delivering a More Sustainable Transport Network</u>		✓
<u>Central Lincolnshire Local Plan 2023-2040 (adopted April 2023) (CLLP)</u>		<u>NKDC LIR</u>	<u>LCC LIR</u>
<u>Policy S1</u>	<u>The Spatial Strategy and Settlement Hierarchy</u>	✓	
<u>Policy S2</u>	<u>Level and Distribution of Growth</u>	✓	
<u>Policy S5</u>	<u>Development in the Countryside</u>		✓
<u>Policy S10</u>	<u>Supporting a Circular Economy</u>	✓	✓
<u>Policy S11</u>	<u>Embodied Carbon</u>	✓	✓
<u>Policy S12</u>	<u>Water Efficiency and Sustainable Water Management</u>		✓
<u>Policy S14</u>	<u>Renewable Energy</u>		
<u>Policy S16</u>	<u>Wider Energy Infrastructure</u>	✓	✓
<u>Policy S21</u>	<u>Flood Risk and Water Resources</u>		
<u>Policy S28</u>	<u>Spatial Strategy for Employment</u>	✓	
<u>Policy S47</u>	<u>Accessibility and Transport</u>	✓	✓
<u>Policy S50</u>	<u>Community Facilities</u>	✓	✓
<u>Policy S53</u>	<u>Design and Amenity</u>	✓	✓
<u>Policy S54</u>	<u>Health and Wellbeing</u>	✓	✓
<u>Policy S57</u>	<u>The Historic Environment</u>	✓	✓
<u>Policy S59</u>	<u>Green and Blue Infrastructure</u>	✓	✓
<u>Policy S60</u>	<u>Protecting Biodiversity and Geodiversity</u>	✓	✓

Policy S61	Biodiversity Opportunity and Delivering Measurable Net Gains		
Policy S66	Trees, Woodland and Hedgerows		✓
Policy S67	Best and Most Versatile Agricultural Land		✓
Policy S84	Ministry of Defence Establishments	✓	

Table 4 – Management Plans

	<u>LCC's position</u>	<u>NKDC's Position</u>	<u>BBC's Position</u>
Outline Construction Traffic Management Plan	TBC	TBC	TBC
Outline Energy Storage Safety Management Plan	TBC	TBC	Agreed
Outline Landscape Ecological Management Plan	TBC	TBC	Agreed
Outline Written Scheme of Investigations – Evaluation & Mitigation	Agreed	Agreed	Agreed
Outline Construction Environmental Management Plan	TBC	TBC	Agreed
Outline Supply Chain, Employment and Skills Plan	TBC	TBC	Agreed
Outline Decommissioning and Restoration Plan	TBC	TBC	Agreed
Outline Operational Environmental Management Plan	TBC	TBC	Agreed
Outline Soil Management Plan	TBC	TBC	Agreed

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

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

Duly authorised for and on
behalf of Lincolnshire County Council

Name:	Neil McBride
Job Title:	Head of Planning
Date:	
Signature:	

Duly authorised for and on
behalf of North Kesteven District Council

Name:	
Job Title:	
Date:	
Signature:	

Duly authorised for and on
behalf of Boston Borough Council

Name:	
Job Title:	
Date:	
Signature:	