Date: 6 May 2022
Ref: 15349a

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BY EMAIL ONLY

Dear Mr Gildersleeves,

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)

BICKER SOLAR FARM LIMITED – PLANNING APPLICATION FOR UNDERGROUND CONNECTION CABLE REQUIRED TO FACILITATE BICKER SOLAR FARM, ON LAND TO THE NORTH WEST OF BICKER, BOSTON

We write on behalf of Renewable Connections Developments Ltd (the 'Applicant'), to submit an application to Boston Borough Council ('BBC') for full planning permission. The application seeks permission for the installation of an underground high voltage (132 kV) electrical cable and associated works (the 'Proposed Development'). The electrical cable is essential to connect the Bicker Solar Farm Project (recently granted planning permission by BBC) to the nearby Bicker Fen Substation ('the substation'). The Proposed Development will allow the renewable electricity generated by the future Bicker Solar Farm to be exported to the local distribution grid network. The proposed cable connection will cross form west to east to connect to the substation. The exact alignment of the cable route has not been determined but will be confirmed through the submission of details secured via planning condition.

The Applicant, Renewable Connections Developments Ltd ('Renewable Connections'), are one of the most experienced renewable energy teams in the UK having developed over 1GW of solar projects globally since 2010. Renewable Connections work in partnership with European Energy, one of the largest renewable energy investors in Europe.

'The Site' or 'Application Site' proposed for the cable route consists of a 0.9 hectare ('ha') parcel of land lying adjacent north west of Bicker Solar Farm Site. Further details of the Application Site and Proposed Development are provided in the below letter. Renewable Connections have secured the relevant permissions with the landowners in control of the Site, in order use the land for the Proposed Development.

The application has been submitted via the Planning Portal (ref. PP-11230405). The application fee is £494.20 and has been settled via electronic payment.

The Application Submission

The planning application comprises the following documents:

1. Application Covering Letter (this document);
2. Completed planning application forms and ownership certificates;
3. Site Location Plan (showing the Site and adjacent Bicker Solar Farm) Ref. Ref. RC041-001;
4. Site Redline Boundary Plan Ref. Ref. RC041-002;
5. Bicker Solar Farm Cable Connection - HDD Drill Profile Plan – Ref. RC041-003;
6. Bicker Solar Farm Cable Connection – 132kv Cable Trench Cross Section Plan Ref. RC41-004;
7. Ecology Phase 1 Note (Prepared by RDF Ecology in April 2022); and
8. Flood Risk Note (Prepared by Kaya Consultants, dated March 2022).

Background and Summary of the Proposed Development

The Applicant has planning permission (under the Town and Country Planning Act 1990 (as amended)) to construct and operate an 80-ha solar farm on land adjacent south west of the Proposed Development Site, known as Bicker Solar Farm. Once constructed and connected to the electricity grid, Bicker Solar Farm would export up to 49.9 megawatts ('MW'), enough to power approximately 15,000 homes. The planning permission (LPA ref. B/21/0443), granted on 17 February 2022, permits the Applicant to operate the Solar Farm for the period of 40 years, at which point it would be decommissioned and the land returned to its previous state.

The Proposed Development is essential to facilitate Bicker Solar Farm, a renewable energy project which would make a significant contribution to the national renewable energy demand. It follows that the established and accepted policy justification for Bicker Solar Farm (as set out in its 'Planning, Design and Access Statement'), remains both valid and relevant to this application. The remainder of this letter describes the Application Site, construction impacts and construction methods involved with the Proposed Development.

The Applicant requires the flexibility to select a cable alignment at a later date following further detailed design work at the Site. Consequently, the Applicant has assessed the entirety of the red line area (as shown on plan ref: RC041-002), including providing technical notes for ecology and flood risk which also cover the entire application site. It should be noted that any cable alignments shown in any of the documents submitted with this application are indicative and may not be representative of the final route. The Applicant has suggested a planning condition which could be added by BBC to the decision notice in order to secure details of the final alignment prior to any works:

(X) Prior to the commencement of development, details of the final underground cable alignment, including working widths shall be submitted to and approved by the Local Planning Authority.

The Application Site

The Application Site is located approximately 2.8 km north west of Bicker Bar. The Site is accessed via the Bicker Solar Farm site, which would use the public highway access (Vicarage Drove and Bicker Drove) to the south, as proposed in the Bicker solar farm application.

The Application Site measures approximately 0.9 ha in area. Once selected, the corridor of land required for the cable alignment would be less than 1m wide and approximately 250m long, from Bicker Solar Farm in the west of the Substation to the east of the Site. It is proposed that horizontal

directional drilling methods ('HDD') will be employed to remove disturbance to any ecological features (further details on construction methods can be found on Page 4 of this Letter).

The entirety of the Application Site is located within Flood Zone 3, the area most at risk of flooding according to the Environment Agency's online flood risk mapping. Information in relation to flood risk has been provided in both this letter and a submitted Flood Risk Note (prepared by Kaya Consultants). The Flood Risk Note covers how the Proposed Development, despite being located within Flood Zone 3, is not considered applicable to the Exception Test, on the basis the cable (besides temporary construction activities) would not interact with the above ground flood zone. It states that the proposed cable (which would be insulated) would be buried for its entire length between the solar farm and OHL tower (once operational), and would be an unmanned installation. As such, during its operational stage the cable would not be vulnerable to a flood event and there would be no risk to people.

There are no planning or environmental designations at or adjacent to the Site. The nearest environmental designation lies approximately 5.1 km south west at Horbling Fen SSSI. The Proposed Development is not considered to result in any impact to designations in the surrounding area at either construction or operation.

An ecological site walkover has also been undertaken at the Site and is detailed in the Ecological Walkover Survey Note (produced by RDF Ecology) submitted as part of the application. The ecological site walkover was carried out in line with the 'Extended Phase 1' habitat survey methodology as set out in the CIEEM Guidelines (2013). The Ecological Walkover Survey Note ('the Ecology Note') confirms that the majority of the Site which would be temporarily affected by the Proposed Development during construction is comprised of arable land of low ecological value. The tussocky grassland north of the sub-station is more diverse and appears to have been left unmanaged since the Bicker Fen sub-station was constructed. The majority of the grassland is of low botanical value supporting a limited range of common and widespread species. It is anticipated that the proposed cable route would only impact temporarily a small area of this habitat. It is likely that the cable route would require the loss of a short section of the hedgerow, unless the section can be installed through directional drilling. However, this loss of the hedgerow would not be significant as the hedgerow is already gappy and isolated from any other hedgerows or wooded area.

In addition to the above, the Ecology Note confirms that no badger setts were recorded within the site or within 50m of the site boundary. Several latrines were found at the ditch crossing south of the site boundary with some containing fresh badger droppings. Although, no evidence of badger foraging activity was recorded within the site boundary. Therefore, given the temporary and small-scale nature of the works no significant impacts upon foraging badgers are predicted.

The ecological site walkover also investigated for the potential of Water Voles and Otters within 50m of the Site. Whilst the ditch at the Site appears suitable for supporting water vole, no evidence of their presence was recorded during the walkover survey and this confirmed the previous survey undertaken by the Landscape Science Consultancy Ltd in 2021 which did not record any water vole activity at this location. Furthermore, no evidence suggesting the presence of otter was recorded during the walkover survey and the habitats present are sub-optimal for this species. In any case it is proposed that the cable will be installed using directionally drilling under the ditch and therefore no direct impacts are predicted on the habitats.

With regards to other species, the ecological note states that there are historical records for the presence of great crested newts (GCN) within a pond and drain located approximately 200m south of

the site to the south of the main sub-station compound. However, none of the results indicated the presence of GCN in any of the ditches and are still considered to provide an accurate reflection of their status.

Cable Installation Methods

It is anticipated that the electrical cable will be installed using both standard trenching techniques and HDD (where appropriate, such as under the ditch). Areas of any standard cable trenching (i.e. non-HDD) would involve the excavation of a narrow area before backfilling, following the placement of the duct and cable. The nominal depth of the trenching will be 1.3m, although in places (for example beneath existing watercourses/ditches) this may be increased to 2-3m.

A cross-sectional drawing has been included as part of this application, entitled '132kv Cable Trench Cross Section Plan – Ref. RC41-004', illustrating a typical cable installation. The electrical cable will be installed in ducts within the trench. The ducts will be surrounded by crushed stone, depending on the location and design requirements. The cable drums will be located at one end of the route and the winch at the other, the bond lead would be fed through the ducts, then connected to the cable and pulled through the ducts.

During the construction works, as referred to above, it is proposed that HDD techniques would be employed for selected sections of the route, these areas would consist (at least) of the field boundary ditch as it also serves as a drainage ditch. HDD is required for this section in order to carry out the works without causing disturbance to watercourses/drains. Chapters in both the Ecology Report and Flood Risk Note reference the use of HDD techniques as the least invasive in terms of preserving local ecology and drainage function, both subjects are covered in more detail below. More areas of HDD may be selected by the Applicant following further detailed design work and the selection of a final route alignment.

For when an alignment is selected and submitted to discharge the relevant condition, a working width of 6m either side of the cable trench will be allocated for the temporary placement/storage of soil excavated from the trench and the laydown of any construction materials.

It is anticipated that the installation of the electrical cable would take approximately 1 month to complete. Any construction vehicles accessing the Site would do so via the construction route agreed in the approved 'Vicarage – Transport Statement' (dated August 2021).

At the end of the works, the Site would be returned to its previous condition. Further detail on the construction methods proposed to be used as part of the cable installation are set out in the section below.

Construction Methods

- Under supervision of a banksman, the excavator with toothless bucket will be escorted to excavation position. A banksman will be present throughout machine operations to ensure safe machine movements.
- Following HSG47 Guidance: 'Avoiding danger from underground services' (2014), the excavator will remove the top soil/vegetation. The excavator will continue the excavation by removing layers of no more than 75mm of spoil.

- To prevent any collapse of unsupported trench and open excavations, excavations to be battered or stepped (dependent on ground conditions) in 500mm or increments if deeper than 500mm.
- Top soil and vegetation will be loaded onto dumper vehicles and transported to the designated spoil heap. This will be sealed by the excavator for future re-instatement.
- Continual CAT Scanning of the excavation area will be undertaken at regular intervals as excavation progresses.
- If any service is found, its position and depth shall be recorded on a site plan. An "Excavation Daily Inspection Check sheet & Log" will also be completed for excavations by the Site Engineer.
- Dewatering of excavations shall only be carried out through filtration and into pre-agreed drainage areas.
- Any work to be carried in proximity to the OHL tower will be done so in accordance with the DNO's guidance and working practices.

Summary

To summarise, the Applicant proposes to install an underground electrical cable from Bicker Solar Farm to a local existing substation. The information provided shows that any impact caused by the Proposed Development (however minor) is temporary for the period of construction, after which the cable will be unnoticeable during its operation.

The proposed cable is considered essential to facilitate the operation of Bicker Solar Farm, a major renewable energy project for the area and one which will contribute greatly to the pressing national need for clean energy. This letter and the submitted documents which form the application demonstrate that the Proposed Development is heavily weighted in favour of approval and should be granted without delay.

We trust that everything has been submitted to allow you to validate this application, and I look forward to receiving confirmation of this in due course. In the meantime, if you require any further information, please do not hesitate to contact me on 020 7489 4830 / rob.booth@dwdllp.com

Yours sincerely,

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