



# Mallard Pass

Solar Farm

## Mallard Pass Solar Farm

**Applicant response to relevant  
representations**

**Procedural Deadline A – 3<sup>rd</sup> May 2023**

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## 1.0 INTRODUCTION

### Purpose of this Document

- 1.1 The purpose of this report is to provide Mallard Pass Solar Farm Limited's (the Applicant) responses to the key issues raised in Relevant Representations submitted by Interested Parties in relation to the Mallard Pass Solar Farm application.
- 1.2 A total of 1,223 Relevant Representations were submitted by Interested Parties. The Applicant's response to these Relevant Representations has been broken down as follows:
- 1.3 The tables within **Appendix 1** contain the Applicant's responses to the Relevant Representations submitted by local authorities, being three Host Authorities':
- Rutland County Council (RR-1016)
  - Lincolnshire County Council (RR-0634)
  - South Kesteven District Council (RR-1078)
- 1.4 The tables within **Appendix 2** contain the Applicant's responses to the Relevant Representations submitted by other Statutory Consultees and Statutory Undertakers:
- Natural England (RR-0823)
  - Historic England (RR-0415)
  - Environment Agency (RR-0323)
  - National Highways (Highways England) (RR-0822)
  - Network Rail Infrastructure Limited (RR-0826)
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  - UK Health Security Agency (UKHSA) (RR-1188)
  - Anglian Water (RR-0062)
  - Black Sluice Internal Drainage Board (RR-0110)
  - National Gas Transmission Plc (NGT) (RR-0819)
  - National Grid Electricity Distribution (East Midlands) plc (RR-0820)
  - National Grid Electricity Transmission Plc (RR-0821)
  - The Forestry Commission (RR-0339)
- 1.5 The tables within **Appendix 3** contain the Applicant's responses to the Relevant Representations submitted by Parish Councils and one neighbouring local authority:
- Bainton and Ashton Parish Council (RR-0087)
  - Carlby Parish Council (RR-1031)
  - Langtoft Parish Council (RR-0619)
  - Ryhall Parish Council (RR-1019)
  - Clipsham Parish Meeting - Rutland (RR-0192)
  - Tallington Parish Council (RR-1135)
  - Careby with Aunby and Holywell Parish Council (RR-0128)
  - Great Casterton Parish Council (RR-0381)

- Toft Cum Lound and Manthorpe Parish Council (RR-1174)
- Greatford Parish Council (RR-0382)
- Braceborough and Wilsthorpe Parish Council (RR-0115)
- Essendine Parish Council (RR-0329)
- Uffington Parish Council (RR-1187)
- Stamford Town Council (RR-1081)
- Barholm and Stowe Parish Council (RR-0089)
- North Kesteven District Council (RR-0855)

1.6 The tables within **Appendix 4** contain the Applicant's responses to 16 Relevant Representations submitted by Non-Statutory organisations:

- Solar Campaign Alliance (RR-1076)
- Rutland Solar Action Group Ltd (RR-1018)
- Mallard Pass Action Group (RR-0676)
- Stamford, Bourne and The Deepings Rambler Group (RR-1082)
- Rutland Local History and Record Society (RR-1017)
- Leicestershire and Rutland Area Ramblers (RR-0627)
- Peterborough Ramblers (RR-0920)
- Lincolnshire Wildlife Trust (RR-0635)
- Mallard Point Ltd (RR-0677)
- Rotary Club of Stamford – Club no. 19155 (RR-1007)
- Community Planning Alliance (RR-0197)
- Carlby Walkers (RR-0131)
- CPRE Lincolnshire (RR-0204)
- CPRE Rutland – the Countryside Charity (RR-0205)
- CPRE – Cambridgeshire and Peterborough (RR-0203)
- Essendine Village Hall (RR-0330)

1.7 The tables within Appendix 5 contain the Applicant's responses to the 1177 Relevant Representations from members of the public and businesses, some of whom have an interest in the land. These tables have been grouped by themes are as follows:

- Land Use and Soils
- Flood Risk
- Landscape and Visual
- Support the Proposed Development
- Traffic and Transport
- Construction Impacts
- Socio-Economic Impacts and Impact on Quality of Life
- Cultural Heritage and Archaeological Impacts
- Project Scale and Size
- Land Contamination
- Lack of Community Benefit
- Climate Change



- Air Quality and Noise levels
- Decommissioning impacts
- Access – Public Right of Ways and Permissive Paths
- Planning Policy and Consenting Strategy
- Compulsory Acquisition – General
- Compulsory Acquisition – Specific
- Supply Chain
- Site Selection, Need for the Development and Alternatives
- General Topics
- Ecology and Biodiversity Impacts
- Environmental Statement – Other Topics

1.9 In the ExA's consideration of the responses in Appendices 1-5, it will note that many references are made to the need case set out in the Statement of Need [APP-202]. Since submission of the Application, the Government has made a number of policy announcements that have further emphasised the need and policy support for large scale solar. This is summarised in the 'Policy Update' appended to the Applicant's Procedural Deadline A Cover Letter. References to the need case set out in the Statement of Need in these responses should therefore be read as incorporating the updated need case set out in that Policy Update.



## **APPENDIX 1 – APPLICANT’S RESPONSES TO THE RELEVANT REPRESENTATIONS SUBMITTED BY LOCAL AUTHORITIES**

**Appendix 1 Host Local Planning Authorities' relevant representations and Applicant's responses**

<b>Rutland County Council (RR-1016)</b>			
<b>Topic</b>	<b>Theme</b>	<b>Statutory Consultee Comment</b>	<b>MPSF Response</b>
Local Impact Report	Planning Policy	In addition to the Local Impact Report the Council intends to comment on the proposed development Local Policy Context Rutland County Council considers that the following local policies are relevant to this application and should be considered as important and relevant to the determination of this application.	Noted. The Applicant will continue to have ongoing engagement with Rutland County Council which will be documented within the Statement of Common Ground.
Planning Statement	Local planning Policy	Core Strategy (CS) Policy CS1 (Sustainable development principles) sets out what the Council considers to be the key elements of sustainable development New development in Rutland will be expected to: a) minimise the impact on climate change and include measures to take account of future changes in the climate; b) maintain and wherever possible enhance the county's environmental, cultural and heritage assets; c) be located where it minimises the need to travel and wherever possible where services and facilities can be accessed safely on foot, by bicycle or public transport; d) make use of previously developed land or conversion or redevelopment of vacant and under-used land and buildings within settlements before development of new green field land; e) respect and wherever possible enhance the	The Applicant has carried out a planning policy assessment in response to Policy CS1 – Sustainable development principles, as part of the DCO application, which can be found in Table 8 – Rutland County Council Local Planning Policy - Table of Compliance, Appendix 3, within the Planning Statement [APP-203]. Following this, it is considered that the Application is in compliance with this policy.

		<p>character of the towns, villages and landscape;</p> <p>f) minimise the use of resources and meet high environmental standards in terms of design and construction with particular regard to energy and water efficiency, use of sustainable materials and minimisation of waste;</p> <p>g) avoid development of land at risk of flooding or where it would exacerbate the risk of flooding elsewhere;</p> <p>h) contribute towards creating a strong, stable and more diverse economy</p> <p>i) include provision, or contribute towards any services and infrastructure needed to support the development.</p>	
Planning Statement	Local planning Policy	<p>Policy CS2 (The Spatial Strategy) sets out the Council's strategy to provide for sustainable development to help create safe and healthy communities and meet the needs of the local economy.</p>	<p>The Applicant has carried out a planning policy assessment in response Local Planning policy which can be found within the Planning Statement <b>[APP-203]</b>. Policy CS2 has been referred to within paragraph 7.2.16 and the applicant's responses to this local policy within paragraph 7.2.18. Following this, it is considered that the Application is in compliance with this policy.</p>
Planning Statement	Local planning Policy	<p>Site Allocations and Policies Development Plan Policy (SAPDP) Policy SP1(Presumption in Favour of Sustainable Development) states when considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the NPPF.</p> <p>It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible,</p>	<p>The Applicant has carried out a planning policy assessment in response to Policy SP1 – Presumption in favour of sustainable development which can be found in Table 9 – Rutland County Council Local Planning Policy - Table of Compliance, Appendix 3, within the Planning Statement <b>[APP-203]</b>. Following this, it is considered that the Application is in compliance with this policy.</p>

		and to secure development that improves the economic, social and environmental conditions in the area.	
Planning Statement	Local planning Policy	<p>Policy CS4 (The Location of Development) sets out that development in Rutland will be directed towards the most sustainable locations in accordance with the settlement hierarchy of Oakham, Uppingham, Local Service Centres, Smaller Service Centres and Restraint Villages.</p> <p>The rest of Rutland, including settlements not identified in settlement categories will be designated as countryside. Development in the Countryside will be strictly limited to that which has an essential need to be located in the countryside and will be restricted to particular types of development to support the rural economy and meet affordable housing needs.</p> <p>The Council will be commenting on the appropriateness of the proposed development in this location with particular attention to its visual impacts given the overall scale of the proposal and the amount of agricultural land take.</p>	<p>The Order Limits are located within the area designated as countryside as defined in Policy CS4.</p> <p>The Applicant has carried out a planning policy assessment in response to Policy CS4 – The location of development, as part of the DCO application, which can be found in Table 8 – Rutland County Council Local Planning Policy - Table of Compliance, Appendix 3, within the Planning Statement <b>[APP-203]</b>. Following this, it is considered that the Application is in compliance with this policy.</p>
Planning Statement	Local planning Policy	<p>Policy CS13 (Employment and Economic Development) focuses on the employment needs of the County but is relevant to the application as point g) indicates that the Council's strategy is to improve workforce skills by:</p>	<p>The Applicant has carried out a planning policy assessment in response to Policy CS13 Employment and economic development, as part of the DCO application, which can be found in Table 8 – Rutland County Council Local Planning Policy - Table of Compliance, Appendix 3, within the Planning Statement <b>[APP-203]</b>. Following this,</p>

		<ul style="list-style-type: none"> <li>i) working with local education and skill agencies, and local businesses to establish training facilities to enhance workforce skills;</li> <li>ii) Support the development of new training facilities on employment sites.</li> </ul>	it is considered that the Application is in compliance with this policy.
Planning Statement	Local planning Policy	<p>Policy CS16 (The Rural Economy) sets out the Council's strategy for the rural economy and amongst other things seeks to:</p> <ul style="list-style-type: none"> <li>a) encourage agricultural, horticultural and forestry enterprises and farm diversification projects where this would be consistent with maintaining and enhancing the environment, and contribute to local distinctiveness;</li> <li>d) safeguard existing rural employment sites and permit the improvement and expansion of existing businesses provided it is of a scale appropriate to the existing development where this would be consistent with maintaining and enhancing the environment, and contribute to local distinctiveness of the area;</li> </ul>	<p>The Applicant has carried out a planning policy assessment in response to Policy CS13 Employment and economic development, as part of the DCO application, which can be found in Table 8 – Rutland County Council Local Planning Policy - Table of Compliance, Appendix 3, within the Planning Statement <b>[APP-203]</b>. Following this, it is considered that the Application is in compliance with this policy.</p> <p>The application allows the diversification of existing agricultural businesses. Chapter 12 of the ES <b>[APP-042]</b> confirms that the land occupied by the Solar PV site only involves part of their respective wider agricultural land holding, allowing farming activities to continue on land outside of the Solar PV Site. Grazing is also proposed to be undertaken amongst the solar arrays within the Solar PV Site, as described in the oLEMP <b>[APP-210]</b>.</p>
Planning Statement	Local planning Policy	Policy SP7 (Non-residential Development in the Countryside) states that amongst other things sustainable development in the countryside will be supported.	The Applicant has carried out a planning policy assessment in response to Policy SP7 – Non-residential development in the countryside, which can be found in Table 9 – Rutland County Council Local Planning Policy - Table of Compliance, Appendix 3, within the Planning Statement <b>[APP-203]</b> . Following this, it is considered that the Application is in compliance with this policy.

Planning Statement	Local planning Policy	The Council will consider and comment on if or how the development contributes towards meeting the requirements of policies CS13, CS16 and SP7.	The Applicant has carried out a planning policy assessment in response to the planning policies, which can be found in Tables 8 and 9 - Rutland County Council Local Planning Policy - Table of Compliance, Appendix 3, within the Planning Statement <b>[APP-203]</b> . Following this, it is considered that the Application is in compliance with this policy.
Local Impact Report	Planning Policy	Comments will focus around the visual impacts of the development and the potential loss of a significant area of agricultural land.	Noted. The Applicant has considered these matters and its position is set out in sections 7.2 and 7.4 of the Planning Statement <b>[APP-203]</b> .
Planning Statement	Local planning Policy	Policy SP15 (Design and Amenity) sets out that the Council will expect all new development to meet the requirements for good design set out in Core Strategy CS19 – Promoting good design.	The Applicant has carried out a planning policy assessment in response to Policy SP15 – Design and Amenity, which can be found in Table 9 – Rutland County Council Local Planning Policy - Table of Compliance, Appendix 3, within the Planning Statement <b>[APP-203]</b> . Following this, it is considered that the Application is in compliance with this policy.
Planning Statement	Local planning Policy	Policy CS18 (Sustainable Transport and Accessibility) sets out how the Council will work with partners to improve accessibility and develop the transport network within and beyond Rutland and accommodate the impacts of new development by supporting new development proposals that include a range of appropriate mitigating transport measures aimed improved transport choice and encourage travel to work and school safely by public transport, cycling and walking, including travel plans; provide safe and well designed	The Applicant has carried out a planning policy assessment in response to Policy CS18 Sustainable Transport and Access, as part of the DCO application, which can be found in Table 8 – Rutland County Council Local Planning Policy - Table of Compliance, Appendix 3, within the Planning Statement <b>[APP-203]</b> . Following this, it is considered that the Application is in compliance with this policy.

		transport infrastructure; providing adequate levels of car parking in line with Council's published car parking standards.	
Planning Statement	Local planning Policy	Policy CS20 (Energy Efficiency and Low Carbon Energy Generation) sets out the Council's policy on renewable, low carbon and de-centralised energy. Low carbon energy generating developments will be supported where environmental, economic and social impacts can be addressed satisfactorily.	The Applicant has carried out a planning policy assessment in response to Policy CS20 Energy Efficiency and Low Carbon Energy Generation, as part of the DCO application, which can be found in Table 8 – Rutland County Council Local Planning Policy - Table of Compliance, Appendix 3, within the Planning Statement <b>[APP-203]</b> . Following this, it is considered that the Application is in compliance with this policy.
Planning Statement	Local planning Policy	Policy SP18 (Wind Turbines and Low Carbon Energy Developments) sets out the Council's policy for low carbon energy developments and states that proposals will be supported where environmental, economic and social impacts can be addressed satisfactorily in accordance with Core Strategy Policy CS20 (Energy efficiency and low carbon energy developments) Low carbon energy generating developments will be supported where they are acceptable.	The Applicant has carried out a planning policy assessment in response to Policy SP18 Wind Turbines and Low Carbon Energy Developments as part of the DCO application, which can be found in Table 9 – Rutland County Council Local Planning Policy - Table of Compliance, Appendix 3, within the Planning Statement <b>[APP-203]</b> . Following this, it is considered that the Application is in compliance with this policy.
Planning Statement	Local planning Policy	Policy CS19 (Promoting Good Design) requires all new development to contribute positively to local distinctiveness and sense of place, being appropriate and sympathetic to its setting in terms of scale, height, density, layout, appearance, materials, and its relationship to adjoining buildings and landscape features, and shall not cause unacceptable effects by reason of visual intrusion, overlooking, shading, noise, light pollution or other adverse impact on local character and amenities.	The Applicant has carried out a planning policy assessment in response to Policy CS19 Promoting Good Design as part of the DCO application, which can be found in Table 8 – Rutland County Council Local Planning Policy - Table of Compliance, Appendix 3, within the Planning Statement <b>[APP-203]</b> . Following this, it is considered that the Application is in compliance with this policy.



Planning Statement	Local planning Policy	Policy CS21 (The Natural Environment) states that development should be appropriate to the landscape character type within which it is situated and contribute to its conservation, enhancement or restoration, or the creation of appropriate new features. The quality and diversity of the natural environment of Rutland will be conserved and enhanced. Conditions for biodiversity will be maintained and improved and important geodiversity assets will be protected. Protected sites and species will be afforded the highest level of protection with priority also given to local aims and targets for the natural environment.	The Applicant has carried out a planning policy assessment in response to Policy CS21 The Natural Environment as part of the DCO application, which can be found in Table 8 – Rutland County Council Local Planning Policy - Table of Compliance, Appendix 3, within the Planning Statement <b>[APP-203]</b> . Following this, it is considered that the Application is in compliance with this policy.
Planning Statement	Local planning Policy	Policy SP23 (Landscape Character in the Countryside) states that proposals to develop on land in the countryside will only be permitted where the development complies with either Policy SP6 (Housing in the countryside) or Policy SP7 (Non-residential development in the countryside) and Policy SP15 (Design and amenity) and Policy SP19 (Biodiversity and geodiversity conservation).	The Applicant has carried out a planning policy assessment in response to Policy SP23 Landscape Character in the Countryside as part of the DCO application, which can be found in Table 9 – Rutland County Council Local Planning Policy - Table of Compliance, Appendix 3, within the Planning Statement <b>[APP-203]</b> . Following this, it is considered that the Application is in compliance with this policy.
Planning Statement	Local planning Policy	Policy SP19 (Biodiversity and Geodiversity Conservation) states that development proposals will normally be acceptable where the primary objective is to conserve or enhance biodiversity or geodiversity. All new developments will be expected to maintain, protect and enhance biodiversity and geodiversity conservation interests in	The Applicant has carried out a planning policy assessment in response to Policy SP19 Biodiversity and Geodiversity Conservation as part of the DCO application, which can be found in Table 9 – Rutland County Council Local Planning Policy - Table of Compliance, Appendix 3, within the Planning Statement <b>[APP-203]</b> . Following this, it is considered that the Application is in compliance with this policy.

		accordance with Core Strategy CS21 (The natural environment)	
Planning Statement	Local planning Policy	Policy CS22 (The Historic and Cultural Environment) states that the quality and character of the built and historic environment of Rutland will be conserved and enhanced.	The Applicant has carried out a planning policy assessment in response to Policy CS22 The Historic and Cultural Environment as part of the DCO application, which can be found in Table 8 – Rutland County Council Local Planning Policy - Table of Compliance, Appendix 3, within the Planning Statement <b>[APP-203]</b> . Following this, it is considered that the Application is in compliance with this policy.
Planning Statement	Local planning Policy	Policy SP20 (The Historic Environment) states that all developments, projects and activities will be expected to protect and where possible enhance historic assets and their settings, maintain local distinctiveness and the character of identified features in accordance with Core Strategy Policy CS22 (The historic and cultural environment).	The Applicant has carried out a planning policy assessment in response to Policy SP20 The Historic Environment as part of the DCO application, which can be found in Table 9 – Rutland County Council Local Planning Policy - Table of Compliance, Appendix 3, within the Planning Statement <b>[APP-203]</b> . Following this, it is considered that the Application is in compliance with this policy.
Planning Statement	Local planning Policy	Policy CS23 (Green Infrastructure, Open Space, Sport and Recreation) states that the existing green infrastructure network will be safeguarded, improved and enhanced by further provision to ensure accessible multi-functional green spaces by linking existing areas of open space. This will be achieved amongst other things by, the continued development of a network of green spaces, paths and cycleways in and around the towns and villages; resisting development resulting in the loss of green infrastructure or harm to its use or enjoyment by the public. The Council intend to comment further on the potential impact of the development on enjoyment of	The Applicant has carried out a planning policy assessment in response to Policy CS23 Green Infrastructure, Open Space, Sport and Recreation as part of the DCO application, which can be found in Table 8 – Rutland County Council Local Planning Policy - Table of Compliance, Appendix 3, within the Planning Statement <b>[APP-203]</b> . Following this, it is considered that the Application is in compliance with this policy.

		existing public rights of way which run across or close to the application site.	
Local Communities	Community benefits	Policy CS8 (Developer Contributions) sets out how and when developer contributions will be sought to ensure that impacts from new developments are suitably mitigated or compensated for. The Council will consider the potential for developer contributions to help mitigate the impacts of the development on the local community in the event that the application is approved.	The Applicant has carried out a planning policy assessment as part of the DCO application, which can be found in Table 8 and 9 – Rutland County Council Local Planning Policy - Table of Compliance, Appendix 3, within the Planning Statement <b>[APP-203]</b> . The Applicant considers that there are no measures that would require developer contributions and will discuss this further with the Council as part of the Statement of Common Ground discussions.
Highways and access	Construction and decommissioning phases	In particular the construction and decommissioning phases of the development and its impacts on the highway network throughout Rutland.	Noted. The Applicant will respond in full to any comments raised once these are made available.
Noise/ Vibration	Impact during construction and decommissioning phases	The potential impacts from the development in terms of noise and vibration in particular during the construction and decommissioning phases of the project.	<p>A detailed and robust noise and vibration assessment has been undertaken in Chapter 10: Noise and Vibration of the Environmental Statement <b>[APP-040]</b>. This includes an assessment of the potential noise and vibration effects during the construction and decommissioning phases, on a worst-case basis considering the predicted noise levels at the closest point to noise-sensitive receptors for each potential noise-generating activity that could occur within each of the relevant Works Area.</p> <p>The assessment’s findings at paragraph 10.13 were that with the implementation of the relevant mitigation measures, no significant adverse noise and vibration effects are expected during the construction and decommissioning phases of the Proposed Development.</p>
Socio-Economic Impacts	Community benefits	The potential impacts of the development including job creation, impacts on tourism, and	The Applicant has undertaken an assessment of potential socio-economic impacts on the local area,

		<p>consideration of any potential for wider community benefits.</p>	<p>including jobs supported during the construction, operation and decommissioning stages and impacts on tourism. The assessment can be found in Chapter 14 of the Environmental Statement <b>[APP-044]</b>. The Applicant estimates that an average of 150 FTE gross temporary jobs will be created over the 24-month construction period, with 50% estimated to be sourced from the local area. It is estimated that 74.5 additional direct and indirect jobs would be supported through the construction phase. The Applicant has also submitted an outline Employment Skills and Supply Chain Plan <b>[APP-211]</b> which will be developed post-consent to seek to capture as many benefits for the local study area as possible.</p> <p>No significant effects are predicted on tourism receptors from the Proposed Development.</p>
<p>Water resources and ground water</p>	<p>Impact of development on flood risk</p>	<p>Impact on Water Resource/ Ground Water / Flood Risk Assessment and potential for mitigation of the impacts of the development throughout all stages of the development on water resource and potential increase flood risk.</p>	<p>The Applicant has undertaken an assessment of potential impacts on the hydrological environment and ground conditions, identifying the potential for mitigation for all phases of the Proposed Development as part of the DCO application. This assessment can be found in Chapter 11 of the Environmental Statement <b>[APP-041]</b>. This found that with the implementation of mitigation measures the potential effects of the Proposed Development on hydrology, hydrogeology flood risk and ground conditions were negligible. A Flood Risk Assessment has been undertaken and can be found within Appendix 11.5 of the Environmental Statement <b>[APP-086]</b> and the management of surface water runoff rates is included in Appendix 11.6: Outline Surface Water Drainage Strategy <b>[APP-087]</b>.</p>

			<p>The Flood Risk Assessment states in Section 3 that implementation of measures in the Outline Surface Water Drainage Strategy will prevent an increase in flood risk elsewhere, while in Section 5 it concludes that the residual risk of the Proposed Development flooding from all sources is negligible.</p>
Land Use and Soils	Agricultural Land Resource/BMV	<p>Potential loss of Best and Most Versatile (BMV) agricultural land along with the cumulative impacts of other NSIP projects which are also proposed within the wider Rutland and Lincolnshire area.</p>	<p>The great majority of the land will not be affected by the installation of panels as part of the Proposed Development. An assessment of the areas affected by tracks, solar stations and the substation is set out in the ES Chapter 12 at Table 12-6. <b>[APP-114]</b>. The area extends to 14.4ha of which 0.5ha is Grade 2 and 3.7ha is sub-grade 3a land within the Best and Most Versatile agricultural land definition.</p> <p>In order for the need for renewable energy generation to be met and the connection at Ryhall substation to be effectively utilized, some higher quality agricultural land is required to be temporarily used for the delivery of Solar PV. However, the use of that land represents only 0.054% of total BMV land in the host authority areas and 0/0097% of the national resource.</p> <p>Consideration of the food production and economic implications of the use of the BMV land for the Proposed Development compared to the production from poorer quality land are set out in the ES at sections 12.4.83 and Table 12-11 <b>[APP-114]</b>. The incremental reduction of crop production from the BMV land compared to non-BMV land is of the order of 250 tonnes (ES 12.4.84) from an annual production of 21million tonnes (ES 12.4.76).</p> <p>The land is not lost, except for the small areas noted above (which the Applicant will seek to restore and in</p>

			any event is of such small size so as to be insignificant) and therefore there is no cumulative effect on agricultural land, as set out in the ES Chapter 12 at section 12.8 <b>[APP114]</b> .
Ecology and Biodiversity	Impact upon habitats and species	The potential impacts during all stages of the development on the local ecology and biodiversity of the area. Particular attention will be paid to the impacts of the development on nationally and internationally protected sites and species.	Chapter 7: Ecology and Biodiversity, of the ES <b>[APP-037]</b> , presents the approach and findings of the assessment of potential impacts on Ecology and Biodiversity. Its conclusion is that there are only localised impacts of significant effect at a District level through loss of hedgerow and verge grassland.
Cultural Heritage	Impact on heritage assets	The potential impact of the development on designated heritage assets including nearby Conservation Areas, Listed Buildings and Scheduled Ancient Monuments. Reference will also be made to the potential impacts of the development on archaeological sites in the area.	<p>The effect of the Proposed Development changing the setting(s) of designated (and non-designated) heritage assets and the impacts on buried archaeological remains has been assessed and reported in Chapter 8: Cultural Heritage <b>[APP-038]</b> (and its associated appendices). No significant or material effects are anticipated, as the nature of the Proposed Development is such that its construction, operation and decommissioning will result in minimal ground disturbance.</p> <p>The Applicant is also proposing a suite of mitigation measures that will be able to be employed at the detailed design phase to enable buried archaeological remains (that are specifically sensitive) to be protected from any form of disturbance. These include localised use of 'no-dig' construction solutions to avoid piling, cable trenches and other construction activities, and/or avoiding installation of PV Arrays altogether in certain</p>

			<p>localised areas. These measures are set out in more detail in the oCEMP <b>[APP-207]</b>.</p> <p>In terms of heritage assets that are above ground, the Proposed Development will alter the current agricultural setting but it will not alter any elements that contribute to the significance of these assets, and no harm to their significance will occur as a result of the Proposed Development. For more detail see ES Appendix 8.4: Cultural Heritage Impact Assessment <b>[APP-068]</b>.</p>
Landscape and Visual	Impact on the wider landscape	The Council will be providing full and detailed comments on the Landscape Visual Impact Assessment submitted with the application and the acceptability of the proposals and the suitability of the proposed landscape mitigation.	Noted. The Applicant will respond in full to any comments raised once these are made available.
Landscape and Visual	Impact on Residential Amenity	The impacts of the development on the amenities of the occupiers of nearby residential properties.	<p>A Residential Visual Amenity Assessment (RVAA) is provided within Appendix 6.4 of the LVIA. The RVAA considers the potential visual effects on dwellings in close proximity to the Order Limits. <b>[APP-057]</b>.</p> <p>The RVAA concludes that due to the design and layout, providing set backs and new planting to residential properties where appropriate, the Proposed Development would not exceed the threshold for residential amenity and would not appear 'overbearing' or 'overwhelming' in views from any of these properties.</p>
Planning Statement	Impact between the proposed development and	The cumulative impacts of the development with other developments in the area including the potential loss of high quality agricultural	A Cumulative Impact Assessment is included in Chapter 16 of the ES <b>[APP-046]</b> , and considers the cumulative impacts the Proposed Development across all topic

	neighbouring applications	land across Rutland and the neighbouring county of Lincolnshire.	<p>assessments in the ES and concludes that no cumulative significant effects will arise.</p> <p>The effect on agricultural land associated with the Proposed Development is reversible in nature, unlike built development. Therefore, other potential developments as identified on the 'Long List' (<i>Appendix 2.4 of the ES [APP-052]</i>), do not influence the decisions of individual landowners, and the use of other land, whether it is of BMV quality or not, would be due to other schemes and is not considered cumulatively.</p>
Other environmental topics	Glint and Glare	The potential additional and wider visual amenity impacts of the development from glint and glare from the siting of the proposed solar panels.	A Glint and Glare Assessment is provided at Appendix 15.3 of the ES, which assesses the likely impacts of the development upon receptors <b>[APP-0104]</b> . With mitigation in place, no significant effects are expected to arise as a result of Glint and Glare impacts.
Access	PRoW	The loss of amenity to the users of public rights of way that run across and nearby the application site.	An Amenity and Recreation Assessment has been undertaken within Appendix 6.5 of the LVIA considering the potential impacts to PROWs <b>[APP-058]</b> . No physical changes to the alignment of existing PROW are proposed and a number of design parameters have been adopted in respect of PROWs that pass through and adjacent to the Order Limits to limit the impact to the recreational and amenity experience of these routes. No significant impacts are anticipated to PROW beyond those to Bridleways E169 and BrAW/1/1 which pass through the Solar PV site area, which will reduce to moderate adverse impacts with mitigation in place.



**South Kesteven District Council (RR-1078)**

Topic	Theme	Statutory Consultee Comment	MPSF Response
Statement of Need; Planning Statement	Planning balance and the need for renewable energy	SKDC has declared a climate emergency recognising a commitment to contribute to the global efforts to tackle climate change. Renewable Energy proposals are supported by national and local policy, and solar photovoltaic generation, including Solar Farms are recognised as an established means of renewable electricity generation. However, the Council recognises there are a number of potential adverse effects that need to be balanced against the benefits of such schemes.	Section 8 of the Planning Statement [APP-203] concludes with a consideration of the Planning Balance and justifies how the overwhelming national need, as demonstrated in the Statement of Need [APP-202] outweighs any potential significant adverse impacts which, as the Environmental Statement sets out, are limited.
Planning Statement	Local planning Policy	Local Plan Policy SD1 (The Principles of Sustainable Development in South Kesteven) sets out the overarching obligation for development proposals to minimise its impact on climate change and contribute towards a strong, stable, and more diverse economy.	The Applicant has carried out a planning policy assessment in response to policy SD1: The Principles of Sustainable Development in South Kesteven as part of the DCO application, which can be found in Table 6 – South Kesteven District Council Local Planning Policy - Table of Compliance, Appendix 3, within the Planning Statement. [APP-203]. Following this, it is considered that the Application is in compliance with this policy.
Planning Statement	Local planning Policy	Policy SP1 (Spatial Strategy) outlines the overall spatial development strategy for the District during the plan period. It identifies that the overall strategy of the Local Plan is to deliver sustainable growth, including new housing and job creation, in order to facilitate growth in the local economy and support local residents. Decisions on the location and scale of new development are to be taken on the basis of the settlement hierarchy established	The Applicant has carried out a planning policy assessment in response to policy SP1: Spatial Strategy in South Kesteven as part of the DCO application, which can be found in Table 6 – South Kesteven District Council Local Planning Policy - Table of Compliance, Appendix 3, within the Planning Statement [APP-203].

		<p>within Policy SP2, and all development proposals are required to protect the best and most versatile (BMV) agricultural land to protect opportunities for food production and the continuance of the agricultural economy.</p>	<p>The great majority of the land will not be affected by the installation of panels as part of the Proposed Development. An assessment of the areas affected by tracks, solar stations and the substation is set out in the ES Chapter 12 in Table 12-6. <b>[APP-114]</b>. The area extends to 14.4ha of which 0.5ha is Grade 2 and 3.7ha is sub-grade 3a land within the Best and Most Versatile agricultural land definition.</p> <p>In order for the need for renewable energy generation to be met and the connection at the Ryhall substation to be effectively utilized, some higher-quality agricultural land is required to be temporarily used for the delivery of Solar PV. However, the use of that land represents only 0.054% of total BMV land in the host authority areas and 0/0097% of the national resource. Consideration of the food production and economic implications of the use of the BMV land for the Proposed Development compared to the production from poorer quality land are set out in the ES in sections 12.4.83 and Table 12-11 <b>[APP-114]</b>. The incremental reduction of crop production from the BMV land compared to non-BMV land is of the order of 250 tonnes (ES 12.4.84) from an annual production of 21 million tonnes (ES 12.4.76).</p> <p>The land is not lost, except for the small areas noted above (which the Applicant will seek to restore and in any event is of such small size so as to be insignificant) and therefore there is no cumulative effect on agricultural land, as set out in the ES Chapter 12 at section 12.8 <b>[APP-114]</b>.</p>
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Planning Statement	Local planning Policy	Policy SP5 (Development in the Open Countryside) is the principal spatial policy of the Development Plan in respect of development in such locations. It identifies that development within the Open Countryside will be limited to that which has an essential need to be located outside of the existing built form of a settlement.	The Applicant has carried out a planning policy assessment in response to policy SP5: Development in the Open Countryside in South Kesteven as part of the DCO application, which can be found in Table 6 – South Kesteven District Council Local Planning Policy - Table of Compliance, Appendix 3, within the Planning Statement <b>[APP-203]</b> . Following this, it is considered that the Application is in compliance with this policy.
Planning Statement	Local planning Policy	Policy RE1 (Renewable Energy Generation) states that proposals for renewable energy generation will be supported subject to meeting the detailed criteria set out in the accompanying Renewable Energy Appendix 3.	The Applicant has carried out a planning assessment in response to Policy RE1 within the Renewable Energy Appendix 3, as part of the DCO application, which can be found in Table 7 – South Kesteven District Council Local Planning Policy - Table of Compliance, Appendix 3, within the Planning Statement <b>[APP-203]</b> . Following this, it is considered that the Application is in compliance with this policy.
Planning Statement	Local planning Policy	As referenced above, Local Plan Policy RE1 supports proposals for renewable energy generation, subject to the detailed policy criteria, and subject to meeting the identified material considerations set out in the accompanying Renewable Energy Appendix 3.  The policy context for the key material considerations for the development are considered further below using the 9 criteria set out in the Renewable Energy Appendix 3 and with references to other local policy.	The Applicant has carried out a planning assessment in response to eight of the criteria within the Renewable Energy Appendix 3, as part of the DCO application, which can be found in Table 7 – South Kesteven District Council Local Planning Policy - Table of Compliance, Appendix 3, within the Planning Statement <b>[APP-203]</b> . Following this, it is considered that the Application is in compliance with these policies.
Planning Statement	Local planning Policy	Local Plan Policy EN1 (Landscape Character) seeks to ensure that development is appropriate to the character and significant natural, historic, and cultural attributes of the features of the landscape	The Applicant has carried out a planning policy assessment in response to Policy EN1: Landscape Character in South Kesteven as part of the DCO application, which can be found in Table 6 – South

		within which it is situated, and contribute to its conservation, enhancement, or restoration.	Kesteven District Council Local Planning Policy - Table of Compliance, Appendix 3, within the Planning Statement <b>[APP-203]</b> . Following this, it is considered that the Application is in compliance with this policy.
Planning Statement	Local planning Policy	Local Plan Policy EN2 (Protecting Biodiversity and Geodiversity) identifies that the Council will facilitate the conservation, enhancement and promotion of the District’s biodiversity and geological interests of the natural environment. This includes seeking to enhance ecological networks and seeking to deliver a net gain on all proposals.	The Applicant has carried out a planning policy assessment in response to Policy EN2: Protecting Biodiversity and Geodiversity in South Kesteven as part of the DCO application, which can be found in Table 6 – South Kesteven District Council Local Planning Policy - Table of Compliance, Appendix 3, within the Planning Statement <b>[APP-203]</b> . Following this, it is considered that the Application is in compliance with this policy and delivers net gain.
Planning Statement	Local planning Policy	Policy EN4 (Pollution Control) identifies that development should seek to minimise pollution and, where possible, contribute to the protection and improvement of the quality of air, land and water. Development will only be permitted if potential adverse effects can be mitigated to an acceptable level by other environmental controls, or by measures included in the proposals.	The Applicant has carried out a planning policy assessment in response to Policy EN4: Pollution Control in South Kesteven as part of the DCO application, which can be found in Table 6 – South Kesteven District Council Local Planning Policy - Table of Compliance, Appendix 3, within the Planning Statement <b>[APP-203]</b> . Following this, it is considered that the Application is in compliance with this policy. No significant residual effects are predicted in respect of pollution control matters.
Planning Statement	Local planning Policy	Policy EN5 (Water Environment and Flood Risk Management) of the Local Plan states that “Development should be located in the lowest areas of flood risk, in accordance with the South Kesteven Strategic Flood Risk Assessment [SRFA]. Where this is not possible the sequential approach	The Applicant has carried out a planning policy assessment in response to Policy EN5: Water Environment and Flood Risk Management in South Kesteven as part of the DCO application, which can be found in Table 6 – South Kesteven District Council Local Planning Policy - Table of Compliance,

		to development will be applied. Where the requirements of the sequential test are met, the exception test will be applied where necessary’.	Appendix 3, within the Planning Statement <b>[APP-203]</b> . The Flood Risk Assessment <b>[APP-086]</b> confirms that the Scheme is compliant with policy tests. Following this, it is considered that the Application is in compliance with this policy.
Planning Statement	Local Planning Policy	Local Plan Policy EN6 (The Historic Environment) is the primary mechanism through which the Council exercises its statutory requirements. This policy states that the Council will seek to protect and enhance heritage assets and their settings in keeping with the policies in the National Planning Policy Framework, and proposals will be expected to take Conservation Area Appraisals into account, where these have been adopted by the Council. Development that is likely to cause harm to the significance of a heritage asset or its setting will only be granted permission where the public benefits of the proposal outweigh the potential harm.	The Applicant has carried out a planning policy assessment in response to Policy EN6: The Historic Environment in South Kesteven as part of the DCO application, which can be found in Table 6 – South Kesteven District Council Local Planning Policy - Table of Compliance, Appendix 3, within the Planning Statement <b>[APP-203]</b> . Following this, it is considered that the Application is in compliance with this policy. In particular, the Scheme will not impact upon the significance of any heritage assets.
Planning Statement	Local Planning Policy	Local Plan Policy ID2 (Transport and Strategic Transport Infrastructure) identifies that the Council will support and promote an efficient and safe transport network, which offers a range of transport choices for the movement of people and goods, reduces the need to travel by car, and encourages the use of alternatives, such as walking, cycling or public transport. The policy requires development proposals to not result in any unacceptable highway safety impacts or result in severe cumulative impacts on the highway network. Proposed schemes should also include appropriate provision for vehicle, two-wheeler and cycle parking.	The Applicant has carried out a planning policy assessment relating to traffic and transport with section 7.12 of the Planning Statement <b>[APP-203]</b> . This, combined with the conclusions of the Access and Highways ES Chapter <b>[APP-039]</b> and the Transport Assessment <b>[APP-074]</b> , demonstrate that with the mitigation measures in place, the Scheme will not result in any unacceptable highway safety impacts or lead to severe impacts to the highway network.

Environmental Statement	Responses to concerns at Stage 2 and not all points have been addressed.	SKDC raised a number of concerns through our stage 2 pre-application response, particularly in relation to the evidence and technical reviews that underpin the various topics in the environmental statement highlighting the importance of ensuring they are sufficiently robust to enable an accurate assessment of the relevant impacts. An initial review of the submitted application would appear to show that some, but not all of the points raised have been addressed. The Council may wish to comment further on these points during the examination stage.	The Applicant will prepare a Statement of Common Ground (SoCG) with SKDC with the intention of highlighting and addressing any outstanding areas of concern.
Environmental Statement	landscape and visual and loss of BMV agricultural land	At this stage the main impacts that the Council wishes to highlight are landscape and visual and loss of BMV agricultural land. However, the absence of comment at this stage on any other topics should not be taken as the Council's agreement on those matters and we reserve the right to comment on those other topic areas through the Local Impact Report.	Noted.
Landscape and visual; Statement of need	Impacts on the rural character and the planning balance.	<p>The proposed scheme would represent a solar development on an unparalleled scale, particularly for this rural context.</p> <p>Whilst the proposed development would make a positive contribution to reducing carbon emissions over its proposed life span, there would undoubtedly be adverse effects that need to be balanced against the benefits.</p>	<p><b>Section 3.3</b> of the <b>Statement of Need [APP-202]</b> describes Government's view that large capacities of low-carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar".</p> <p><b>Section 8</b> of the <b>Planning Statement [APP-203]</b> concludes with a consideration of the Planning Balance and justifies how the overwhelming national need, as demonstrated in the <b>Statement of Need</b></p>

			<p>outweighs any potential significant adverse impacts which, as the <b>Environmental Statement [APP-048]</b> sets out, are limited.</p> <p>The potential impacts to the landscape and visual resource have been comprehensively assessed in accordance with best practice guidance and informed by consultation with stakeholders to ensure the scope of assessment was appropriate. Furthermore, considerable efforts have been made to minimise the landscape and visual impacts of the Proposed Development.</p> <p>The results of this assessment are set out in the LVIA within Chapter 6 of the ES <b>[APP-036]</b>. The LVIA concludes that there are limited localised residual significant effects.</p> <p>The character and appearance of the Order limits would change from arable farmland to a utility-scale solar PV development. However, due to landform and the framework of woodlands, treebelts and hedgerows proposed, the Solar PV Site would appear subdivided and compartmentalised.</p> <p>The mass, scale and form of the Solar PV Site and Onsite Substation would not be viewed as a continuous block of development as the 'modular' characteristics of solar development allow it to sit within the existing landscape fabric ed . These factors would assist to reduce the overall perceived scale of the development.</p>
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			<p>The results of this assessment are set out in detail within Chapter 6 Landscape and Visual, of the ES <b>[APP-036]</b> and concludes that there are limited localised residual significant effects.</p>
Landscape and visual	The magnitude of these effects and mitigation.	The submitted LVIA concludes that there would be some adverse landscape and visual effects that would arise as a result of the proposed development. Further comments on the magnitude of these effects and the effectiveness of any proposed landscaping mitigation will be provided through the Local Impact Report.	<p>Noted. The Applicant will respond to any comments within the Local Impact Report (LIR) once received.</p> <p>The potential impacts to the landscape and visual resource have been comprehensively assessed in accordance with best practice guidance and informed by consultation with stakeholders to ensure the scope of assessment is appropriate and proportionate.</p> <p>The results of this assessment are set out within detail within Chapter 6 Landscape and Visual, of the ES <b>[APP-036]</b> ] and concludes that there are limited localised residual significant effects.</p> <p>A comprehensive mitigation package is set out in the Green Infrastructure Strategy Plan <b>[App-173]</b> that is secured through the DCO via the OLEMP <b>[APP-210]</b>.</p>
Land use and Soil	The cumulative impact on BMV	In relation to Agricultural Land Use, over 40% (216ha) of the land proposed for solar PV would be sited on BMV land. It is important to highlight the cumulative impacts of solar development on BMV agricultural land, as a number of similar scale proposals are currently under consideration locally. Further comments on cumulative impacts, the sequential approach and impacts on BMV will be provided through the Local Impact Report.	<p>The great majority of the land will not be affected by the installation of panels as part of the Proposed Development. An assessment of the areas affected by tracks, solar stations and the substation is set out in the ES Chapter 12 at Table 12-6. <b>[APP-114]</b>. The area extends to 14.4ha of which 0.5ha is Grade 2 and 3.7ha is sub-grade 3a land within the Best and Most Versatile agricultural land definition.</p>



			<p>In order for the need for renewable energy generation to be met and the connection at Ryhall substation to be effectively utilized, some higher quality agricultural land is required to be temporarily used for the delivery of Solar PV. However, the use of that land represents only 0.054% of total BMV land in the host authority areas and 0/0097% of the national resource.</p> <p>Consideration of the food production and economic implications of the use of the BMV land for the Proposed Development compared to the production from poorer quality land are set out in the ES at sections 12.4.83 and Table 12-11 <b>[APP-114]</b>. The incremental reduction of crop production from the BMV land compared to non-BMV land is of the order of 250 tonnes (ES 12.4.84) from an annual production of 21million tonnes (ES 12.4.76).</p> <p>The land is not lost, except for the small areas noted above (which the Applicant will seek to restore and in any event is of such small size so as to be insignificant) and therefore there is no cumulative effect on agricultural land, as set out in the ES Chapter 12 at section 12.8 <b>[APP114]</b>.</p>
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**Lincolnshire County Council (RR-0634)**

Topic	Theme	Statutory Consultee Comment	MPSF Response
Local Impact Report and Examination		In due course each authority will submit an individual Local Impact Report (LIR). This representation identifies the main topic/aspects of the proposal which LCC has an interest in and which we are likely to want to discuss further as part of the Examination. A more detailed statement of the Council's views and position on the project will be contained in the subsequent LIR.	Noted.
Landscape and Visual Impact	Methodology, approach and conclusion.	LCC has been involved in a number of meetings with the developer pre-submission and provided feedback in relation to the methodology and approach taken in assessing the landscape and visual impacts of the development. Whilst LCC has therefore been engaged with the developer to date we have yet to review the findings and conclusions made. As a result, we intend to submit representations through our LIR which will set out our views insofar as the proposal affects Lincolnshire.	Noted.
Cultural Heritage and Archaeological	Insufficient evaluation	Insufficient evaluation has been undertaken to allow for an understanding of the archaeological potential or to provide the basis for reasonable mitigation to deal with the impacts of this development. Despite concerns having been raised during the pre-application stage the applicant has failed to provide a reasonable baseline assessment of the archaeological resource and the development's impact upon it.	The Applicant is of the opinion that sufficient assessment (evaluation) has been undertaken to design suitable mitigation and thus inform the decision, in accordance with industry good practice and aligned with policy. Specifically, EN-3 notes (draft 2023 in relation to Solar Photovoltaic Generation projects, at paragraph 3.10.100; 3.10.105; 3.10.106) that below ground impacts are "generally limited"; that "in some instances, field studies may include intrusive investigative work" and that this should be "proportionate". This matter

			<p>is presented within Chapter 8: Cultural Heritage <b>[APP-038]</b> paragraphs 8.4.2 - 8.4.6 (re impacts) and section 8.3 re mitigation.</p> <p>The Applicant further understands that LCC's concern is focused on the <u>extent</u> of evaluation undertaken, not the evaluation methods undertaken.</p> <p>Furthermore, a consolidated archaeological evaluation report has been submitted alongside this Response to Relevant Representations document at Procedural Deadline A, which reports on the full scope of evaluation undertaken by the Applicant.</p>
Cultural Heritage and Archaeological	Methodology	<p>Throughout the process we have advised on detailed specific requirements to provide a sufficient evidence base and therefore to allow for sufficient understanding of the site specific archaeological potential across the full extent of the proposed impact zone as is required by the NPPF, EIA Regulations and National Policy Statement EN-1.</p> <p>However, this has not been undertaken to the standard LCC would expect and therefore the Cultural Heritage section has been based upon only a limited amount of evaluation work and yet it is presented as the complete and full understanding of the archaeological resource across the site.</p>	<p>The Applicant is of the opinion that the assessment work completed is proportionate and fully compliant with policies of EN-1 and EN-3 (including in the 2023 draft as stated in Paragraphs 3.10.98 to 3.10.110, 3.10.128, 3.10.129, &amp; 3.10.151), the NPPF and the EIA Regulations.</p> <p>Of particular note (within all of the relevant policies) is the need to understand the specific nature of the potential impacts of the Proposed Development (acknowledged in policy to be 'limited'); to undertake a 'proportionate' assessment of these effects; and to develop mitigation proposals to manage any residual effects. The Applicant is of the opinion that this assessment has been completed and suitable mitigation can be delivered. On the specific matter of the EIA Regulations, the Applicant is of the opinion that the potential for 'significant effects' have been adequately assessed. This matter is presented within paragraphs 8.4.2 to 8.4.6 within Chapter 8: Cultural Heritage <b>[APP-038]</b>.</p>

			<p>The Applicant has carried out a planning policy assessment in an accordance with the NPS EN1 and draft NPS EN3, NPPF, and the Local Planning policies, as part of the DCO application Planning Policy - Table of Compliance can be found within Appendix 3, within the Planning Statement <b>[APP-203]</b>.</p>
Cultural Heritage and Archaeological	Mitigation proposed is uninformed	<p>The mitigation proposed is therefore uninformed and cannot be fit for purpose and LCC is of the view that further archaeological evaluation within the red line boundary is necessary to understand the extent, nature and significance of surviving archaeology so that appropriate mitigation can be determined.</p>	<p>In light of the policy requirements, the Applicant is of the opinion that sufficient assessment work has been completed to inform the options for mitigating the potential impacts of the Proposed Development (on buried archaeological remains) to reflect the archaeological characterisation of the Site that has been developed in light of the evaluation undertaken.</p> <p>In any event, a consolidated archaeological evaluation report has been submitted alongside this Response to Relevant Representations document at Procedural Deadline A and the Applicant will be liaising with LCC to develop the next stage of WSIs to guide post-consent activities.</p>
Cultural Heritage and Archaeological	Approach and conclusion	<p>LCC has serious concerns about the approach and conclusions made with regard to the impacts of this proposal on cultural heritage assets within Lincolnshire. It is our view that the approach taken has been dismissive and expresses a wholesale devaluation of cultural heritage and the submission does not meet the evidential requirements as set out in the relevant policy and guidance including Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (Regulation 5 (2d)), National Planning Statement Policy EN1 (Section 5.8) and the National Planning Policy Framework. A much</p>	<p>The Applicant is of the opinion that due regard has been given to the importance of understanding the significance of cultural heritage assets and the potential impact of the Proposed Development. Full details of the approach taken by the Applicant can be found in Chapter 8: Cultural Heritage <b>[APP-038]</b> and its associated appendices.</p>

		<p>fuller and detailed explanation of our concerns will be provided as part of the subsequent LIR.</p>	
Highways and Access; oCTMP	Construction phase	<p>LCC as Local Highway Authority has been involved in a number of meetings with the developer pre-submission. The submitted highway details both faithfully record and update the pre-application discussions and meetings that have taken place.</p> <p>The Transport Assessment element of the Environmental Statement examines the conventional road transportation impacts of the proposed development, both during the construction phase – which will be the most impactful – and the operational phase.</p> <p>The initial plans for the construction phase have been refined and improved as now detailed in the Outline Construction Traffic Management Plan (OCTMP). Routing of HGVs have also been discussed and options considered.</p>	Noted.
Highways and Access	Highway improvements	<p>Highway improvement works are proposed as part of the development and these would need to be secured through Planning Obligations to make the proposal acceptable in planning terms</p>	<p>The Applicant is willing to discuss suitable protections for LCC as highway authority, but notes that the DCO includes standard, well precedented drafting for enabling the Applicant to carry out street works without the need for other approvals or agreements.</p> <p>The CTMP is secured via a Requirement of the DCO.</p>
Highways and Access	Temporary road closures	<p>Temporary road closures will also be required for the installation of cables; also shown are temporary speed limits and temporary signalisation of junctions for works. The agreement and approval of these would be undertaken by LCC Streetworks and Permitting Team nearer the time, when other activities on the highway network are known, and full consideration of necessary diversion routes can be undertaken. We will submit a much fuller</p>	

		representation and views on the potential highway impacts of the proposal through our subsequent LIR.	
Design and Access	Connection with PRow	Likely to make representations in connection with Public Rights of Way – insofar as the proposal affects routes within Lincolnshire	Noted. The Applicant will respond in full to any issues raised at a later date.
Water		Likely to make representations in connection with Surface Water Flooding and Drainage – as Lead Local Flood Authority for Lincolnshire	Noted.
Climate Change	Sustainability Benefits	Likely to make representations in connection with Climate Change – LCC will comment in respect of the conclusions made with regard the sustainability benefits of the development and the contribution it makes to reducing greenhouse gas emissions.	Noted.
Land use and Soil	Impact and loss of BMV	Likely to make representations in connection with Impact and loss on agricultural land including Best and Most Versatile – insofar as the proposal affects Lincolnshire.	Noted.



**APPENDIX 2 – APPLICANT’S RESPONSES TO THE RELEVANT REPRESENTATIONS  
SUBMITTED BY OTHER STATUTORY CONSULTEES AND STATUTORY  
UNDERTAKERS**

**Appendix 2 Relevant Representations from Other Statutory Consultees and the Applicant's responses**

<b>Natural England (RR-0823)</b>			
<b>Topic</b>	<b>Theme</b>	<b>Statutory Consultee Comment</b>	<b>MPSF Response</b>
Ecology and Biodiversity	Shadow Habitat Regulations Assessment	Section 8 of the shadow Habitat Regulations Assessment (sHRA) (ES Appendix 7.5) concludes that there will be no likely significant effect arising from the Proposed Development on any European sites either alone or in combination with other plans or projects. Natural England concurs with this conclusion.	Noted.
Ecology and Biodiversity	Shadow Habitat Regulations Assessment	Sections 6.4 and 6.5 of the sHRA rule out any impacts from other pathways during construction, and from all pathways during operation. Natural England concurs with this assessment and the reasoning provided.	Noted
Ecology and Biodiversity	Internationally Designated Site – Rutland Water	Natural England concurs with the conclusion that the order limits do not comprise Functionally Linked Land. The minimal use of the order limits by species associated with Rutland Water indicates that the order limits are not critical to, or necessary for, the ecological or behavioural functions of any bird populations associated with Rutland Water.	Noted.
Ecology and Biodiversity	Internationally Designated Site – Baston Fen	Table 3 of the sHRA discusses the potential for impacts to Baston Fen SAC from hydrological changes and contamination/pollution. The applicant acknowledges that there is a potential pathway for impacts due to connectivity between the order limits and Baston Fen SAC. However, the sHRA concludes that the development will not have a likely significant effect on the SAC when taking into account the embedded mitigation within the scheme design. This includes	Noted.



		standoff from the West Glen River, vegetation cover, implementation of a Construction Environment Management Plan (CEMP), Water Management Plan (WMP) and the dilution of pollutants due to the distance between the order limits and the SAC.	
Ecology and Biodiversity	Internationally Designated Site – Baston Fen	The WMP includes measures to manage sediment and surface waters during construction (Section 2.3, and summarised in Table 1-1) which we consider to appropriately mitigate potential pollution events to the West Glen River, and thus Baston Fen SAC, during construction.	Noted.
Ecology and Biodiversity	Internationally Designated Site – Mitigation	Mitigation specifically intended to avoid of reduce harmful effects should be assessed within the Appropriate Assessment stage of the HRA. Natural England considers that as the mitigation required to remove a likelihood of significant effects is embedded within the scheme design, and not included specifically to avoid impacts to the site, a conclusion of no Likely Significant Effects at the screening stage of the HRA is suitable. A requirement for the implementation of the CEMP and WMP is required to ensure the development is implemented as described.	The CEMP and WMP are secured pursuant to Requirement 11 of the draft DCO <b>[APP-017]</b> .
Ecology and Biodiversity	Nationally Designated Sites	Small sections of Ryhall Pasture and Little Warren Verges SSSI are located within the Order limits to the northwest. The outline Landscape Ecological Management Plan (oLEMP) notes the intention to manage the hedgerows along the road verges to prevent over shadowing of the calcareous grassland interest. Natural England welcomes this inclusion and considers impacts to the SSSI to be unlikely during operation. Where hedgerow management is undertaken	Compliance with the terms of the OLEMP is secured by Requirement 7 of the draft DCO <b>[APP-017]</b> .

		effectively, we consider this could have a positive impact on the condition of the SSSI. It is important that the measures relating to the SSSI within the LEMP are implemented as described, and a requirement should be used to ensure this.	
Ecology and Biodiversity	Nationally Designated Sites - Ryhall Pasture and Little Warren Verges SSSI (Construction)	Table 3-2 of the oCEMP notes that 'toolbox talks' will be undertaken to ensure all contractors are aware of features of interest. We recommend this highlights the specific locations of the SSSIs, particularly the areas within the Order Limits. Table 3-6 of the oCEMP notes the measures to be implemented to prevent impacts from air quality, including via dust mobilisation. We consider that where the CEMP is implemented, significant impacts to this SSSI can be avoided.	The oCEMP has been updated to specify that this must form part of the Toolbox talks and submitted alongside these responses to Relevant Representations.
Ecology and Biodiversity	Nationally Designated Sites	Due to the separation from the order limits of the remaining seven SSSIs, and the non-mobile nature of their interest features, we consider significant impacts to be unlikely.	Noted.
Ecology and Biodiversity	Nationally Designated Sites and hydrologically connection	We would also note Baston and Thurlby Fens SSSI lies approximately 5km east of the order limits downstream along the West Glen River and is therefore hydrologically connected. However, due to the separation of this SSSI from the order limits, the nature of the development and the measures to be implemented within the CEMP and WMP, we consider significant impacts to be unlikely.	Noted.
Ecology and Biodiversity	Protected Species	ES Chapter 7 (Ecology and Biodiversity) that licences will be required for works relating to Badgers (section 7.5.29), Great Crested Newt (Section 7.6.5). Natural England has not received submission of draft protected	Licence applications have not yet been submitted as these require the final details of the layout to be confirmed.

		<p>species licence applications for review. Without draft licence applications we are unable to issue Letters of No Impediment (LoNI).</p> <p><i>Happy to work with the applicant and the examining authority to ensure the required Protected Species Licences are sought.</i></p>	<p>However, in respect of GCNs, the District Level Licensing option is also being explored.</p> <p>The works requiring licences will likely be very limited and will be supported by the necessary documentation.</p>
Ecology and Biodiversity	Biodiversity Net Gain	<p>The application documents include a Biodiversity Net Gain Metric (Appendix 7.6), which utilises the Biodiversity Metric 3.1 and indicates the development will give rise to a 72.19% gain in habitats units and a 40.83% gain in hedgerow units. Natural England welcomes the inclusion of these calculations and is generally supportive of the enhancements proposed through the development. We note that the proposed gains are significantly above the intended 10% mandatory gain.</p>	Noted.
Ecology and Biodiversity	Biodiversity Net Gain – River units (West Glen River)	<p>Nonetheless, the change in river units is 0%. When Biodiversity Net Gain becomes mandatory, it will be necessary to deliver a 10% net gain in each of the three areas (habitat, hedgerow and river). The rationale for a ‘no net loss’ approach to river units on this project is set out in sections 2.1.3 to 2.1.6 of Appendix 7.6. Natural England acknowledges the design principles of avoiding development within the river corridor and providing habitat enhancements alongside the river. The enhancements set out in section 2.1.5 of Appendix 7.6, and detailed within the oLEMP, are welcomed and are likely to indirectly have a positive effect on the river.</p>	<p>Noted. The West Glen River runs north to south through the central part of the Order limits. Within the Order limits, the extent of the West Glen River is subject to Work Number 4, as shown on the Work Plans <b>[APP-006]</b>, which allows for electrical cables and communication cables, connecting the PV Arrays and the Onsite Substation.</p> <p>The electrical cables and communications cables will be Horizontally Direction Drilled (HDD) beneath the West Glen River, with a minimum offset from the West Glen River of 10m to HDD works as set out in the Design Guidance within the Design and Access</p>

		<p>The discussion also notes that Anglian Water is planning works to improve the West Glen River through their Catchment Based Approach (CaBA). Natural England acknowledges the benefit of ensuring the river corridor is left undeveloped to allow these improvements, however, they should not be assessed as a benefit coming directly from the development, as the works of Anglian Water would be going ahead anyway.</p>	<p>Statement <b>[APP-204]</b> These measures will ensure the retention of the West Glen River and associated habitats and will not result in hydrological changes.</p> <p>Appendix 7.6 of the Environmental Statement sets out the approach to the Biodiversity Net Gain calculation for the Proposed Development. For Rivers, the onsite baseline was assessed at 88.01 units. Based on the applicants approach there will be a 0% change for river units. The West Glen River Corridor was identified as a key structuring landscape scale component on which to build the Proposed Development around. Opportunities for improvements along the West Glen River Corridor have been identified and are set out within the Green Infrastructure Strategy included in the outline Landscape Environmental Management Plan (OLEMP) <b>[APP-210]</b>, which includes:</p> <ul style="list-style-type: none"><li>• new wet woodland / riparian planting in the West Glen River Corridor;</li><li>• Enhancement to the river corridor is proposed with new riparian planting such as wet woodland/carr woodland and also the creation of shallow scrapes to provide new habitat to fauna, including birds</li><li>• Creation of shallow scrapes designed to flood periodically will be included along the West Glen Corridor. These will be seeded with species typical of flooded meadows. These features will provide</li></ul>
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			<p>foraging habitats for wintering wildfowl and contributing to diversifying the habitats along the river corridor.</p> <ul style="list-style-type: none"><li>• Otter holts will be created adjacent to the West Glen River in secluded, not publicly accessible areas. These will include an entrance tunnel and a large chamber, based on approved designs for these features.</li></ul> <p>During the pre-application stage, the Applicant has engaged with Anglian Water who have identified the West Glen River for potential works to improve biodiversity and riparian habitats as part of their Catchment Based Approach (CaBA) partnerships programme.</p> <p>No formal improvement scheme has been confirmed for the potential improvement works. However, should the works proceed, these would be mutually compatible and beneficial with the aspiration of Green Infrastructure Strategy and would bring biodiversity benefits to the West Glen River. The PV Arrays have been removed from both the west and east banks of the West Glen River to ensure that the Proposed Development does not prejudice any forthcoming design and the Applicant is willing to continue to work with Anglian Water to deliver to deliver a design that meets the objectives of the Green Infrastructure Strategy, as described in the oLEMP.</p>
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			<p>The improvements delivered through the CaBA scheme will not and have not been counted towards the Biodiversity Net Gain of the Proposed Development.</p>
Ecology and Biodiversity	Biodiversity Enhancements – Green Infrastructure Strategy Plan	<p>Figure 6.11 (Green Infrastructure Strategy Plan) provides an illustrative overview of the Green Infrastructure and enhancements that will come forward as part of the development. Natural England is generally supportive of the enhancements proposed and welcomes the management objectives set out within section 3 of the oLEMP.</p>	Noted.
Landscape and Visual	Cumulative landscape impacts and Landscape character	<p>The proposed development is not located within, or within the setting of, any nationally designated landscapes. As a result, Natural England has no specific comments to make on the landscape implications of this development. The examining authority should have regard for the landscape character of the area; we welcome the reference and discussion made regarding Natural England’s National Character Areas and other Local Landscape Character Assessments within ES Chapter 6 (Landscape and Visual). We would also like to stress the importance of cumulative landscape impacts from the development; note the significant number of other solar developments proposed in Lincolnshire, Nottinghamshire and Rutland.</p>	<p>The potential impacts to the landscape and visual resource, including settlements, has been comprehensively assessed in accordance with best practice guidance and informed by consultation with stakeholders.</p> <p>The results of this assessment are set out in detail within the LVIA <b>[APP-036]</b> and concludes that there are limited localised residual significant effects. The assessment also includes a consideration of cumulative schemes, with no significant effects predicted with other solar developments.</p> <p>The Design and Access Statement <b>[APP-204]</b> sets out how the design of the Proposed Development has responded to its context,</p>

			including the design principles which have informed the design.
Land use and Soils	BMV Agricultural Land	Based on the information provided within the Environmental Statement (ES) (Chapter 12: Land Use and Soils and Appendices 12.2 and 12.4), it appears that the proposed development will result in the temporary development of 852 ha, of which 360 ha is BMV agricultural land (Grades 1, 2 and 3a land in the Agricultural Land Classification (ALC) system), including the Mitigation and Enhancement area, as determined from a semi-detailed ALC survey. It is acknowledged that some of the Mitigation and Enhancement area comprises retained arable fields. Within the Order Limits, 14.4 ha are proposed to be permanently lost, of which 4.2 ha is BMV.	Noted.
Land use and Soils	BMV Agricultural Land	An assessment of potential impacts of the Mitigation and Enhancement area on agricultural land and soils has not been undertaken by the Applicant. The ES (Chapter 12) should include either an additional table or an expanded table 12.1 to clearly show the amounts and proportions of agricultural land, including BMV across the full Order Limits, impacted by each element of the Proposed Development, including permanent infrastructure, temporary solar PV arrays; retained arable fields and other mitigation and enhancement options.	<p>Table 12-1 of Chapter 12 of the ES [<b>APP-042</b>] provides a breakdown of the land quality by grade and proportion for the Order Limits and the areas within the solar PV site and field margins, as described in the methodology.</p> <p>The areas affected by the substation and other infrastructure are set out in Tables 12-4 and 12-5, and summarised in Table 12-6. The areas affected amount 0.5ha Grade 2, 3.7ha Grade 3a and 10.2ha of poorer quality land.</p> <p>Annex A to this Response to Relevant Representations includes a table which sets out the ALC grades of land within the Mitigation and Enhancement Areas. The ALC grades are not set out for the entirety of the Mitigation</p>

			and Enhancement Areas in the annex as some of these areas are included within the Solar PV Site which are reported on in Table 12-1 of Chapter 12 of the ES. As such, Annex A sets out the ALC grades within the 'biodiversity and arable areas'. This area comprises 0.3ha that is to be used for skylark plots. These plots will not continue under arable use during operation but there would be no adverse effects on the soil resource with potential for beneficial effects due to resting of the soils. The soils could be returned to arable production following decommissioning of the Proposed Development.
Land use and Soils	BMV Agricultural Land	A time limit is not being proposed for the consent, and therefore all areas of hardstanding (e.g., access tracks, converter station) are considered in Chapter 12 as though they are permanently sealed. This would be limited to small areas of which <5 ha is BMV Agricultural land.	Noted.
Land use and Soils	BMV Agricultural Land	During the life of the proposed development, it is likely that there will be a reduction in agricultural production over the whole development area. Furthermore, if not time limited as described, the proposed development has the potential to lead to the permanent reduction in agricultural production. This should be considered whether this is an effective use of land in line with the National Policy Statement for Energy (EN-1) and Renewable Energy Infrastructure (EN-3), which encourages the Applicant to seek to 'minimise impacts on the best and most versatile agricultural land (defined	The application seeks temporary use of the land for the production of low-carbon energy. The ES has not identified any specific project impact which would require the development to be linked to a specific operational timeframe, however, it is anticipated that the development will be decommissioned at some point in the future in accordance with the Outline Decommissioning Management Plan.



		as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5) except where this would be inconsistent with other sustainability considerations’.	<p>Thus while there is not a timeframe, the impacts will be reversible. The measures in the oSMP, as well as considered impacts of the solar PV parts of the Proposed Development, mean that there will not be a permanent reduction in agricultural production.</p> <p>The Site Selection Assessment <b>[APP-203]</b> and DAS <b>[APP-204]</b> explain how BMV considerations have been applied to the Proposed Development, which has sought to minimise impacts to such land.</p>
Land use and Soils	BMV Agricultural Land	We would also draw to your attention to Planning Practice Guidance for Renewable and Low Carbon Energy (March 2015) (in particular paragraph 013) and advise you to fully consider BMV land issues in accordance with that guidance.	Noted. Issues relating to land type have taken into account relevant UK policy considerations at national, regional and local level. The response to these key policies is set out within the Planning Statement <b>[APP-205]</b> . The guidance referred to, is considered in Appendix 3 which sets out that the Applicant has properly considered and applied the factors set out in that guidance.
Land use and Soils	BMV Agricultural Land	It is considered that as the solar panels would be secured to the ground by steel piles with limited soil disturbance, they could be removed in the future with no permanent loss of agricultural land quality likely to occur, provided the appropriate soil management is employed and the development is undertaken to high standards. However, the potential impact on agricultural land and BMV land could be lessened if the Proposed Development was time limited.	<p>The Applicant welcomes confirmation of this point from Natural England.</p> <p>The Applicant has committed to appropriate soil management measures through the measures set out in the soils management plan and excavation materials management plan <b>[APP-213]</b>, compliance with which is secured by DCO Requirement.</p>

Land use and Soils	BMV Agricultural Land	Consequently, Natural England would advise that any grant of planning permission should be made subject to requirements to safeguard soil resources and agricultural land, including a required commitment for the preparation of reinstatement, restoration and aftercare plans; normally this will include the return to the former land quality (ALC grade).	<p>The Applicant considers that appropriate soil restoration and aftercare measures are secured through the soils management plan and decommissioning environmental management plan, both of which are secured via DCO Requirement.</p> <p>The ALC grade of the farmland within the Solar PV site will not be altered by the proposed scheme, with the possible exception of tracks and infrastructure areas.</p> <p>The soil in those areas will be restored to a quality comparable to the land immediately adjacent to the areas being restored. The methodology for achieving this will be set out in the SMP. Reference will not be made to the 1988 ALC Methodology as it is considered unlikely that the 1988 methodology will still be in force at the decommissioning stage.</p>
Land use and Soils	BMV Agricultural Land	We also suggest a requirement should be imposed to ensure that at the end of the operational phase, following decommissioning, the arable land occupied by the Solar PV site is reverted to its current ALC grade and cropping regime where appropriate.	The ALC grade of the farmland within the Solar PV site will not be altered by the proposed scheme, with the possible exception of tracks and infrastructure areas.

			<p>Consequently upon decommissioning the ALC grade of the majority of the site will be unchanged.</p> <p>The soil in those areas will be restored to a quality comparable to the land immediately adjacent to the areas being restored. The methodology for achieving this will be set out in the SMP. Reference will not be made to the 1988 ALC Methodology as it is considered unlikely that the 1988 methodology will still be in force at the decommissioning stage.</p> <p>It is not considered appropriate to dictate that the land be returned to the current cropping regime as such cropping may not be appropriate for the farming business or farming practice at the time of the end of the scheme.</p>
Land use and Soils	BMV Agricultural Land impacted by Mitigation and Enhancement	Chapter 12 states that 239 ha of the Mitigation and Enhancement Areas will remain in agricultural use and are not affected by any works. The remaining Mitigation and Enhancement areas will be split into a range of habitats, including proposed tussock grassland, proposed calcareous grassland and retained arable fields. The ES should include either an additional table or an expanded table 12.1 to clearly show the amounts and proportions of agricultural land, including BMV, impacted by each element of the proposed mitigation and enhancement alongside the amounts and proportions of agricultural land impacted by the permanent infrastructure and temporary solar PV arrays, so that it is clear what ALC grades are potentially affected across the full Proposed Development.	<p>Table 12-1 of Chapter 12 of the ES [<b>APP-042</b>] provides a breakdown of the land quality by grade and proportion for the Order Limits and the areas within the solar PV site and field margins, as described in the methodology.</p> <p>The areas affected by the substation and other infrastructure are set out in Tables 12-4 and 12-5, and summarised in Table 12-6. The areas affected amount 0.5ha Grade 2, 3.7ha Grade 3a and 10.2ha of poorer quality land.</p> <p>Annex A to this Response to Relevant Representations includes a table which sets out the ALC grades of land within the Mitigation</p>

			and Enhancement Areas. The ALC grades are not set out for the entirety of the Mitigation and Enhancement Areas in the annex as some of these areas are included within the Solar PV Site which are reported on in Table 12-1 of Chapter 12 of the ES. As such, Annex A sets out the ALC grades within the 'biodiversity and arable areas'. This area comprises 0.3ha that is to be used for skylark plots. These plots will not continue under arable use during operation but there would be no adverse effects on the soil resource with potential for beneficial effects due to resting of the soils. The soils could be returned to arable production following decommissioning of the Proposed Development.
Land use and Soils	BMV Agricultural Land – Restoration	The baseline ALC Grade is important to inform appropriate restoration/aftercare criteria, so that the ALC following decommissioning is the same as the baseline. In the absence of appropriate, soil-specific mitigation, there is a risk of soil loss and damage, which could impact the restoration (Paragraph 12.4.14).	Paragraph 12.4.14 of Chapter 12 Land Use and Soils <b>[APP-042]</b> considers the restoration of temporary working areas to agricultural use at the end of the construction period. The ALC grade of these areas will be known once the extent of construction compounds has been determined. The measures in the oSMP mean that appropriate soil specific mitigation will be put in place.
Land use and Soils	BMV Agricultural Land – Methodology	Whilst we broadly agree with the EIA assessment methodology presented in Appendix 12.2, the significance of assessment should take account of the pattern of grades on a site so that the highest significance value for the agricultural land receptor is that which is then applied to the site as a whole. As such, the potential land take of 14.4 ha (access tracks	The ES methodology is based on the IEMA methodology, and the suggested approach would not accord with this and would lead to an inaccurate assessment.  The Proposed Development will affect 0.5 ha of Grade 2 and 3.7 ha of Subgrade 3a. Each grade

		<p>and substation considered together) would have a moderate magnitude of change, and due to the presence of Grade 2 land, the sensitivity would be very high sensitivity, resulting in a large or very large adverse significance. This should be reflected in tables 12-8 and 12-14.</p>	<p>must be separately assessed through the EIA tables (Appendix 12.2) and the greatest impact then determines the overall impact.</p> <p>To illustrate why this is the correct approach, consider a theoretical scheme involving 1 ha of Subgrade 3a land (which would be a high sensitivity resource, minor magnitude impact, and consequently a slight or moderate significance impact). If the application site was 11ha in total but with only 1 ha Subgrade 3a and 10 ha of Grade 4 and the sensitivity was applied to the whole 11 ha, the impact would be greater (high sensitivity, moderate magnitude, moderate or large significance impact). If the application site was 21ha but still with only 1 ha Subgrade 3a but with the rest being 20 ha Grade 4, and the significance was applied to the whole, the impact would increase to large or very large (high sensitivity, major magnitude, large or very large significance). Given that in all cases only 1ha of Grade 3a is involved, the impact should remain constant. The suggested amended methodology would result in an unrealistic assessment.</p>
Land use and Soils	BMV Agricultural Land – Decommissioning	<p>An unambitious approach to the assessment has been taken assuming the restoration would not return the soil to a comparable quality following decommissioning. This misses the opportunity of implementing good practice to assure restoration of the land to the baseline ALC grade, minimising the potential loss of soil functions (Paragraph 12.4.20).</p>	<p>It is anticipated that these areas will be capable of restoration back to comparable quality and the oSMP seeks to ensure that soils are stored in the right way and placed to enable restoration back to the current ALC grade to be achievable. Notwithstanding this, the assessment has taken a precautionary approach.</p>

Land use and Soils	BMV Agricultural Land – Construction	<p>Whilst the method proposed for the installation of the solar PV arrays does not involve any digging or soil mixing, there is the risk of soil damage due to trafficking, especially when the soils are wet. The physical loosening of compacted soils may only provide temporary alleviation, while actively damaging the soil’s biological capability to recover and maintain its structure in the long-term, with frequent cultivation often a factor associated with poorly structured soils. Therefore, compaction should be avoided as far as possible in the first instance. Any decompaction or remediation activities should be done when the soils are in a suitably dry condition.</p> <p>A key mitigation measure to minimise the potential detrimental impact of construction activities on the soil resource is to ensure that the grass sward is fully established (i.e., no bare ground), prior to the installation of the panels and associated infrastructure. This should be specified in the Outline Soil Management Plan.</p>	<p>The measures in the oSMP seek to minimise the risk of soil damage through trafficking.</p> <p>Where it can be achieved, advanced sowing with grass is advantageous for construction purposes. However, in some areas that will not provide the best outcome, and a successful sward may be better achieved by sowing following installation and when trenching has been completed.</p> <p>Accordingly the SMP will set out the aspiration of advance-sowing as much of the Site as possible, but leaves the detail of local decisions to be taken closer to the start of works. The decision will be influenced by the expected timing of construction works, the weather, and the date when agricultural crops are harvested.</p>
Land use and Soil	Soil damage and oSMP.	<p>Concern regarding the Applicant’s consideration that the amount of smearing and soil damage presented in Insert 12.9 is acceptable (also repeated in the oSMP). This type of soil damage can impact soil function as well as secondary detrimental impacts, such as increased overland flow and erosion.</p>	<p>The concern is noted. The oSMP seeks to avoid localised damage to surface soils of this type. It is agreed that, until rectified, localised damage such as the type shown may result in localised effects such as run-off or erosion. The purpose of including the photograph is to show that such areas are nevertheless recoverable. Most farms will at some point over the year affect soils in a similar manner and will then recover that localised damage without resultant long-term damage. Land is not downgraded or significantly affected by damage of this sort.</p>

Land use and Soil	Soil damage	<p>Furthermore, these photos (including Insert 12.9) indicate that trafficking occurred when the soils were not sufficiently dry, which goes against the Applicant's commentary regarding the appropriate timing of works (in the oSMP). Long term damage of the soil can occur as a result of this type of activity, including subsoil compaction. This damage can only be deemed to be restored following the excavation of soil pits following restoration to confirm there is no residual subsoil compaction.</p>	<p>This type of damage does indeed go against the objectives of the oSMP. The photograph is contextual, but shows a site constructed during the winter because Government tariffs required connection by the following April. There was no deep subsoil compaction, however. The machinery that created the ruts was small (a Bobcat is visible between the rows) and much lighter than agricultural tractors. In the example photograph, installed in 2015, soil pits were dug in 2022 and no long term effects were identified.</p>
Land use and soil	Loss of agricultural land	<p>The onsite substation will involve the loss of 6.4 ha of agricultural land. The whole field has been considered as lost, although the footprint will be substantially smaller. Whilst this presents a worst-case assessment, it misses the opportunity for the project to show how it avoids/minimises impacts to BMV land through micro siting of the substation away from BMV agricultural land.</p> <p>Furthermore, the assessment should consider the total land take across all elements (as presented in tables 12-6 and 12-7), rather than each individual element to more accurately reflect the potential impact of the development on agricultural land and soils.</p>	<p>The substation area recorded includes the whole of the field for the purposes of this assessment, as the areas not directly affected by construction would otherwise still not be farmed. It is noted that in any event the amount of land physically affected is less than 6.4 ha.</p>
Land use and soil	Impact on soil composition	<p>Paragraphs 12.4.67 and 12.4.100 (bullet ii). It should be noted that whilst arable reversion to grassland has been shown to benefit Soil Organic Matter (SOM), this benefit will only extend to the duration of the reversion, i.e.,</p>	<p>It is agreed that the benefits of increased soil organic matter as a result of a reversion to grassland of arable soils, which account for most of the soils within the PV Panel area, will</p>

		<p>during the operational phase and restricted to those areas of land currently under cultivation.</p> <p>However, there could be a disbenefit to the soil resource due to unknowns as a result of the solar development infrastructure. It is currently unclear as to what impact the solar panels may have on the soil properties such as carbon storage, structure and biodiversity. For example, as a result of changes in shading; temperature changes; preferential flow pathways; micro-climate; and vegetation growth caused by the panels. Therefore, it is unknown what the overall impact of a temporary solar development will have on soil health.</p>	<p>occur during the operational phase. The OM build-up will be a benefit for arable crops after decommissioning, and whilst those OM levels may deteriorate over time once returned to arable, that will be a management matter post decommissioning rather than an inevitability. Many arable soils are currently depleted of organic matter but that does not mean that will necessarily occur after decommissioning if the OM levels have been restored by grassland use for the operational phase of the development.</p> <p>In respect of other possible disbenefits as listed, there is a possibility of some of these effects but it is considered to be remote as the proposed arrays will have a minimum clearance of 0.8m at the front of the PV Table and a minimum gap of 2m between consecutive rows of PV Tables which will allow light and rainfall to reach the ground between and beneath the PV Tables. Only large, very low-mounted panels are likely to result in shaded and drier areas. Observations of grassland growth and soil conditions below panels from operating sites around the country, especially where sheep are grazing, give no cause for concern.</p>
Land use and Soil	Outline Soil Management Plan (oSMP) – Deficiencies	Soil handling, movement and trafficking should be undertaken under the supervision of an appropriately experienced soil specialist to advise on and supervise soil handling, including identifying when soils are dry enough to be handled. Suitable criteria for assessing when the soil is in this state should be provided.	Noted. Reference to the proposed control measures have been added to the oSMP submitted alongside this Response.



		Reference could usefully be made to the field tests for suitably dry soils provided in Table 4.2	
Land use and Soil	Outline Soil Management Plan (oSMP) – Deficiencies	The Scope of the oSMP should be expanded to include the soil management of the land under the proposed ecological and mitigation areas, and aftercare. Although there is no soil movement proposed in these areas, soil trafficking will occur and therefore mitigation measures need to be in place to minimise the potential impact on the soil resource.	Noted. Reference to the proposed control measures have been added to the oSMP submitted alongside this Response.
Land use and Soil	Outline Soil Management Plan (oSMP) – Deficiencies	The sensitivity of the soil is derived from the ICE EIA Handbook as presented in the IEMA Guidelines, in which the MCL, HCL, C and SCL are of medium resilience. Only coarse textures soils can be of high resilience.	Noted.
Land use and Soil	Outline Soil Management Plan (oSMP) – Deficiencies	There is risk of compaction of the top- and subsoil layers by repeated trafficking and trafficking in unsuitable conditions.	Noted, and the measures in the oSMP seek to mitigate against such impacts. These measures mean that there will not be a permanent reduction in soil quality and properties, and hence the potential for agricultural production.
Land use and Soil	Outline Soil Management Plan (oSMP) – Deficiencies	The proposed construction methodology in Section 5 should refer to the <a href="#">Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites</a> .	Noted. Reference to the code of practice has been added to the oSMP submitted alongside this Response.
Land use and Soil	Outline Soil Management Plan (oSMP) – Deficiencies	Tall vegetation / crops should be cleared prior to topsoil stripping. The full depth of topsoil should be stripped (Sections 5 & 6).	Noted. Reference to the proposed control measures have been added to the oSMP submitted alongside this Response.

Land use and Soil	Outline Soil Management Plan (oSMP) – Deficiencies	The proposed stockpile locations, volumes and soil type(s) should be presented in a figure in the SMP. The stockpiled soils should be labelled and protected from trafficking and damage. Any soil stockpiles in place for more than 6 months need to be seeded.	Noted. The oSMP submitted with this Response has been updated to include the requirement for stockpiled soils to be labelled to ensure protection from trafficking and damage.
Land use and Soil	Outline Soil Management Plan (oSMP) – Deficiencies	Areas of the site which are not to be stripped or used for stockpiling, haul routes or compounds must be clearly marked by signs and barrier tape and protected from trafficking and construction.	Noted. The oSMP submitted with this Response has been updated to include these control measures.
Land use and Soil	Outline Soil Management Plan (oSMP) – Deficiencies	To minimise the potential detrimental impact of construction activities on the soil resource it should be ensured that the grass sward is fully established (i.e., no bare ground), prior to the installation of the panels and associated infrastructure	<p>The measures in the oSMP seek to minimise the risk of soil damage through trafficking.</p> <p>Where it can be achieved, advanced sowing with grass is advantageous for construction purposes. However, in some areas that will not provide the best outcome, and a successful sward may be better achieved by sowing following installation and when trenching has been completed.</p> <p>Accordingly the SMP will set out the aspiration of advance-sowing as much of the Site as possible, but leaves the detail of local decisions to be taken closer to the start of works. The decision will be influenced by the expected timing of construction works, the weather, and the date when agricultural crops are harvested.</p>
Land use and Soil	Outline Soil Management Plan (oSMP) – Deficiencies	The restoration criteria need to be set out in the detailed SMP, including the restored ALC grade for all land within the Order Limits.	Noted. Further detail has been added to the oSMP submitted alongside this Response. The soil will be restored to a quality comparable to the land immediately adjacent to the areas being restored. The methodology for achieving

			this will be set out in the SMP. Reference has not been made in the oSMP to the 1988 ALC Methodology as we consider it unlikely that the 1988 methodology will still be in force at the decommissioning stage.
Land use and Soil	ES Appendix 12.4: ALC Survey	There is a lack of discussion of the site-specific soils data derived from the detailed ALC Survey at the Access tracks / Substation site, with regards to soil volumes, stockpile locations, handling requirements and re-use which would be expected to be included in the Outline Soil Management Plan (oSMP).	Noted. Reference has been added to the oSMP.
Land use and Soil	ES Appendix 12.4: ALC Survey	Data on the laboratory assessment of particle size (PSD) is provided; however, information is also needed about how this limited point information has been used in informing soil texture for the wider site.	The soil and ALC survey involved the sampling of soils at 334 locations across the Site, with 4 soil pits dug and 11 samples of soil sent for laboratory analysis. The lab analysis was used to validate the hand texturing results from the 334 auger point sampling. The explanation of soil sensitivity is set out in the ALC [APP-091]. This has informed the oSMP.
Land use and Soil	ES Appendix 12.4: ALC Survey	Data is provided for two soil pits only. Discussion is needed about how this information has been used to inform the soil properties for the wider site.	The soil and ALC survey involved the sampling of soils at 334 locations across the Site, with 4 soil pits dug and 11 samples of soil sent for laboratory analysis. The lab analysis was used to validate the hand texturing results from the 334 auger point sampling. The explanation of soil sensitivity is set out in the ALC [APP-091]. This has informed the oSMP .
Ecology and Biodiversity	Ancient Woodland or Ancient/veteran trees	There is no Ancient Woodland or ancient/veteran trees within the order limits. However, there are blocks of ancient woodland near the site boundary on the northeast and northwest. We consider that where the	Noted.

		CEMP is implemented as described, impacts to these woodlands are unlikely.	
Design and Access Statement/ Highways and Access	Public Right of Way	It is noted the temporary diversion of a Public Right of Way (PRoW) may be required during construction. We recommend this diversion should be in place before any construction works take place within the vicinity, to ensure the route remains accessible at all times. We welcome the retention of all PRoW within the order limits, and the inclusion of additional permissive footpaths through the development. In particular, we welcome the consideration given for access to the 'Nature Area' along the West Glen River corridor via a new permissive footpath.	<p>This commitment to implement diversions prior to commencement of construction [will be/has been] added to the oCEMP in Table 3-10 as shown in red text in the below extract.</p> <p>During construction of the internal access tracks these PRoW will be temporarily diverted. Each minor diversion will be clearly marked out, along with appropriate signage at either end of the diversion which will take the most direct route possible. The diversion routes will be agreed and implemented with the relevant local authority for each diversion prior to construction of the Proposed Development.</p>
DCO	Requirement 7 – Landscape and Ecology Management Plan	Natural England welcomes the inclusion of a requirement for the LEMP; consider the measures as set out in the oLEMP to be satisfactory in protecting the elements of the natural environment which represent the key areas of our remit. We also welcome the wording to include a requirement for a minimum of 10% Biodiversity Net Gain.	Noted
DCO	Requirement 9 – Surface and Foul Water Drainage	Natural England welcomes the inclusion of a requirement for the WMP. The WMP is important to prevent pollution incidents to the West Glen River, which flows to Baston Fen SAC and Baston and Thurlby Fens SSSI. Natural England consider the measures as set out in the oWMP are satisfactory to prevent an adverse effect on nationally and internationally designated sites.	Noted

DCO	Requirement 11 – Construction Environment Management Plan	Natural England welcomes the inclusion of a requirement for the CEMP. The measures set out within the oCEMP include those we consider necessary to prevent impacts to nationally and internationally designated sites.	Noted
DCO	Requirement 12 – Operational Environment Management Plan	Natural England welcomes the inclusion of a requirement for the OEMP.	Noted
DCO	Requirement 18 – Decommissioning and Restoration	Natural England welcomes the inclusion of a requirement for the DEMP; for its production within 12 months of the decision to decommission the development. The measures set out within the oDEMP include those we consider necessary to prevent impacts to nationally and internationally designated sites	Noted
DCO	Requirement 14 – Soil Management Plan	Natural England welcomes the inclusion of a requirement for the SMP. The inclusion of a requirement for an Outline Excavated Materials management Plan is also welcomed. However, we consider there to be important elements missing which are required to protect the soil resource within the order limits. Natural England has no specific comment on the wording of the DCO requirement; it is the content of the SMP we consider requires amendments	Noted. Comments on the SMP are addressed above.
DCO	Omission 1	As noted within our above comments on Chapter 12 (Land Use and Soils), we consider the implementation of a time limit for the DCO would reduce the potential long-term impact on agricultural land and BMV land.	Paragraph 3.10.56 of draft NPS EN-3 provides that although an upper limit of 40 years is typical, applicants may seek consent without a time-period.  Chapter 5 of the Environmental Statement <b>[AS-010]</b> states that the EIA has been carried out on the basis that the Proposed Development is

			<p>permanent, to ensure a worst-case assessment of likely effects.</p> <p>Whilst the EIA has assessed the operational impacts of the Proposed Development as permanent, it is the case that any impacts related to the use of the land are considered to be reversible, pursuant to the management plans secured by the DCO.</p> <p>The ES has not identified any specific project impact which would require the Proposed Development to be linked to a specific operational timeframe. It is also the case that as technology improves, design lifetimes are likely to increase. Therefore, the Applicant is not seeking a time limited consent.</p> <p>However, whilst a time limited consent is not sought, it is anticipated that the development will be decommissioned at some point in the future, as the Applicant is not proposing any systematic repowering or wholesale replacement of PV modules or other infrastructure. Paragraph 3.10.59 of draft NPS EN-3 acknowledges that decommissioning can be achieved relatively easily and cheaply.</p> <p>For the purposes of assessing decommissioning with the ES, it has been assumed that the Proposed Development would take place after 40 years, although it is noted that</p>
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			<p>decommissioning could take place prior to or after this timeframe subject to how the technology is performing at the time.</p> <p>It also noted that in the government's consultation response to the draft NPSs (dated March 2023), the government stated that it does not agree that solar DCOs should be limited to a maximum specified period and the draft revised NPS EN-3 makes clear (at paragraph 3.10.140) that applicants can apply for a non time limited consent.</p>
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**Historic England (RR-0415)**

Topic	Theme	Statutory Consultee Comment	MPSF Response
Cultural Heritage	Impact on heritage assets	We note that despite its landscape scale the scheme has it appears addressed the setting of designated heritage assets through design (layout and deployment of green space).	Noted.
Cultural Heritage	Archaeological surveys	With regards to buried archaeological remains it is important that risk of avoidable / unmitigated damage to sensitive remains is well managed in proportion to their importance. This can be achieved through layout, deployment of green space and construction options for cabling and panel mounting etc. Archaeological risks can thus be well addressed, but only if there is a sound understanding of where archaeological sensitivity and importance lies across the site.	<p>This is agreed. The Applicant is of the opinion that sufficient 'understanding of archaeological potential' to inform the decision has been achieved following the completion of the programme of trial trenching. A Written Scheme of Investigation (WSI) was prepared for archaeological mitigation and is appended to the Interim Trial Trenching Summary Report [APP-070]. The oCEMP [APP-207] provides for the detailed CEMP(s) to reflect archaeological mitigation required during construction works as set out in the WSI.</p> <p>As directed by NPS EN-1 and EN-3, it is correct and appropriate to deal with these matters by suitably worded requirements in the DCO, as per the wording included in Requirement 10 in the Draft DCO [APP-017].</p>
Cultural Heritage	Archaeological surveys	Sufficiency of field evaluation is vital because some features (such as for instance early medieval burial grounds or Roman high-status buildings) would be both of high importance and high sensitivity to the insertion of panel mounting piles.	<p>This is agreed. No evidence of medieval burial grounds or high-status Roman buildings was discovered during the assessment work completed. A Written Scheme of Investigation (WSI) (appended to the Interim Trial Trenching Summary Report [APP-070]) was prepared for archaeological mitigation. The WSI is referenced in the oCEMP [APP-207], which provides for ongoing archaeological</p>



			evaluation and assessment in advance of and during construction.
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**Environment Agency (RR-0323)**

Topic	Theme	Statutory Consultee Comment	MPSF Response
Ecology and Biodiversity	Ecology management plan	We have reviewed Chapter 7 and the Outline Landscape and Ecology Management Plan, with reference to the ecology of the West Glen River and other surface waters on site. We are satisfied with the assessment and proposals and have no concerns to raise at this stage.	Noted.
Ecology and Biodiversity	Ecology management plan	The Outline Landscape and Ecology Management Plan proposes shallow scrapes, otter holts and permissive footpaths along the West Glen River, with wet woodland, riparian planting and a nature area in the river corridor. We recognise the potential value of these and have no concerns to raise regarding impacts on the river. However, details of any works within 8 metres of the river will need to be submitted to us for approval, through agreed protective provisions. This applies particularly to the proposed footpath.	<p>The Applicant is in discussions with the Environment Agency with regard to the protective provisions, with the aim of reaching agreement before the end of the Examination.</p> <p>The Applicant sent comments on the protective provisions to the Environment Agency on 15 February 2023. The Applicant is awaiting a response from the Environment Agency. Part 5 of the draft DCO (Rev 1) submitted at Procedural Deadline A has been updated to reflect the latest position and will be updated further to reflect the protective provisions once agreed. The <b>Schedule of Changes [EN010127/APP/9.3]</b> contains a summary of the provisions currently under discussion that have not yet been agreed.</p>
Water Resources and Ground Conditions	Flood Risk Mitigation	Based on the available information, we agree with the conclusion of Chapter 11 that the proposed development poses a negligible risk to groundwater. The site is predominantly greenfield in nature and only limited potential sources of contamination have been identified. We welcome Requirement 15, Ground conditions, of the draft DCO to safely manage any land affected by contamination. We refer the applicant to the best	Noted.

		practice guidance provided in our Scoping Consultation response.	
Water Resources and Ground Conditions	Flood Risk Mitigation	The applicant should ensure that during all phases of development (construction, operation and decommissioning), all appropriate pollution prevention measures are adopted to ensure the integrity of the water environment. We welcome the inclusion of Requirement 11, Construction environmental management plan, to secure this.	Noted.
Water Resources and Ground Conditions	Flood Risk Mitigation	The matters relating to fluvial flood risk have been scoped and addressed appropriately. We agree with the proposed embedded mitigation relating to the West Glen River, which includes buffer zones from the river for construction works. The sequential approach within the site has been suitably applied.	Noted.
Water Resources and Ground Conditions	Flood Risk Mitigation	Based on the available information, we agree that the construction works should have a negligible impact on flood risk related to the West Glen River if all mitigation measures and standard construction procedures are followed.	Noted.
Water Resources and Ground Conditions	Flood Risk Assessment	The areas of the site adjacent to the West Glen River include land in Flood Zones 2 ('medium probability') and 3 ('high probability'). Flood Zone 3 is important for storing flood water and this has been addressed adequately in the FRA, with proposed buffer strips between the river and proposed solar panel mounted structures. We also note that the mounted structures will be mounted 0.8m above the ground level, with the solar panels and infrastructure to be located entirely outside of the 1% annual probability fluvial flood extents, with allowance for climate change.	Noted.

Water Resources and Ground Conditions	Flood Risk Assessment	We note from section 12.4.16 of the FRA that watercourse crossings are required and horizontal directional drilling methods will be used to direct cabling beneath the West Glen River. Details of this will need to be submitted to the Environment Agency for approval prior to works beginning; this is currently proposed to be secured through protected provisions.	<p>The Applicant is in discussions with the Environment Agency with regard to the protective provisions, with the aim of reaching agreement before the end of the Examination.</p> <p>The Applicant sent comments on the protective provisions to the Environment Agency on 15 February 2023. The Applicant is awaiting a response from the Environment Agency. Part 5 of the draft DCO (Rev 1) submitted at Procedural Deadline A has been updated to reflect the latest position and will be updated further to reflect the protective provisions once agreed. The <b>Schedule of Changes [EN010127/APP/9.3]</b> contains a summary of the provisions currently under discussion that have not yet been agreed.</p>
Other Environmental Topics	Waste	We have reviewed section 15.7, Waste, the contents of which are satisfactory.	Noted.
Land Use and Soils	Outlines Soil Management Plan	We have reviewed these documents in relation to matters within our remit only. We note the intention to store top- and sub- soils around the site and use them for reinstatement of trenches and landscaping as the works progresses, meaning that there will be no waste soils to deal with. We advise that any temporary soil heaps should be stored at least 10 metres from any watercourse, to avoid silty runoff being washed into the watercourse during heavy rainfall events. We welcome the inclusion of Requirement 14, Soil management plan, and agree that the Environment Agency should be consulted when application is made to discharge this.	The outline Construction Environmental Management Plan <b>[APP-207]</b> states that watercourses will be buffered by 10m and drains will be buffered by 6m, which infrastructure will not encroach on. The oCEMP and outline Soil management Plan <b>[APP-213]</b> submitted with this Response have been updated to state that temporary soil heaps should be stored at least 10 metres from any watercourse.

DCO	Part 4 of Schedule 15	The draft DCO proposes disapplication of the Environmental Permitting (England and Wales) Regulations 2016 (e) in respect of a flood risk activity only (Part 2, 6(1)(e)). We are in discussion with the applicant's legal representative regarding agreement of protective provisions. Please note the draft provisions in Part 4 of Schedule 15 of the DCO are not yet in an agreed format. Accordingly, we will notify the Examining Authority when these have been agreed and provide our formal agreement to the disapplication of the Environmental Permitting Regulations at that point.	In accordance with section 150 of the Planning Act 2008, the Applicant is seeking to disapply certain legislation. The Applicant is in discussions with the Environment Agency with regard to the protective provisions, with the aim of reaching agreement before the end of the Examination.
DCO	Requirement 11 and 12	We welcome our inclusion as a specific consultee to Schedule 2, Requirements 11 (Construction environmental management plan), 12 (Operational environmental management plan) and 14 (Soil management plan), to comment on detailed matters relating to pollution prevention.	Noted
DCO	Requirement 18	We request that we are also included as a specific consultee to Requirement 18, to enable us to comment on the decommissioning environmental management plan, as this will include issues that fall within the Environment Agency's remit such as waste disposal, pollution prevention measures and environmental incidents.	The draft DCO (Rev 1) submitted at Procedural Deadline A has been updated accordingly to include the Environment Agency as a specific consultee to Requirement 18.
DCO	Consents and Licenses	The applicant acknowledges that an environmental permit may be needed from the Environment Agency if effluent from welfare facilities is treated and discharged to groundwater and that an abstraction and/or impounding license may be needed for concrete batching and dust suppression.	Noted. The contractor will apply for any relevant Environmental Permit or license that is required.

DCO	Consents and Licenses	<p>We are satisfied with the intention for these applications to be made by the contractor before they are needed. Based on the information submitted with the planning application, we have not identified any major permitting concerns but stress the importance of allowing sufficient time for applications to be processed. Water in the area can be scarce during the warmer, drier months of the year and there may not be water readily available when the developer needs it. It may be necessary to consider having water storage in place in advance for use for dust suppression purposes.</p>	<p>Noted. Alternative sources of water for dust suppression can be implemented as described in the Outline Water Management Plan. <b>[APP-214]</b>.</p>
DCO	Book of Reference	<p>We note from the Book of Reference submitted [APP-023] that the applicant seeks possession (though we understand on a temporary basis in most, if not all, cases) of various plots of land where the Environment Agency is listed as either owner, or person enjoying easement or right over land. This relates to 6 plots of land, references: 02-136; 02-142; 02-144; 04-06; 04-17; 04-19. We are currently making further enquiries regarding these plots of land and whether the powers sought in the DCO will result in any detriment to the carrying out of the Environment Agency's undertakings, particularly in relation to the operation of the Gwash-Glen water transfer scheme. At this stage, therefore, the Environment Agency must object to any acquisition of land or rights in relation to its land interests until it has had a proper opportunity to assess the potential effect of the acquisitions sought by the applicant on its ability to carry out its operations. We will update the Examining Authority on our position when we lodge our Written Representations.</p>	<p>Noted. The Applicant is continuing to engage with the Environment Agency on this issue, as set out in draft Statement of Common Ground submitted alongside this Response document.</p> <p>Plots 02-136, 04-06, 04-17 and 04-19 are required for ecological mitigation, cabling, and the installation of solar arrays. Plots 02-142 and 02-144 are required for the installation of cabling along Bourne Road; it should be noted that the EA's interest in these plots relates to the river running beneath the highway.</p>

Planning Statement	Principle of Development	In summary, we can confirm that we have no objection to the principle of proposed development, as submitted, although we may pursue an objection in relation to the Environment Agency land interests the applicant seeks to acquire. We are satisfied that the ES has adequately considered issues and topics that fall within our remit. The draft DCO secures appropriate mitigation in relation to these issues and topics.	Noted.
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**National Highways (Highways England) (RR-0822)**

Topic	Theme	Statutory Consultee Comment	MPSF Response
Highways and access	Strategic Road Network (SRN)	In relation to the Mallard Pass Solar Project, our principal interest is in safeguarding the A1 and A47 trunk roads. Although the SRN is outside the Order Limits, it is understood that construction traffic will be routed via the A1 and A47. As such, we reserve the right to make written representations if an impact of construction traffic on the SRN is identified, or if changes to the application are made which result in impacts to the SRN.	Noted.



**Network Rail Infrastructure Limited (RR-0826)**

Topic	Theme	Statutory Consultee Comment	MPSF Response
Book of Reference	Land Ownership and Compulsory Powers	<p>The Book of Reference (BoR) identifies 13 plots (Plots) of land over which Network Rail have rights or land is owned or occupied by Network Rail, including, land forming part of (or adjacent to) the operational railway being the East Coast Main Line (EC Main Line) in respect of which compulsory acquisition powers are sought (Compulsory Powers). The Scheme requires that electrical cabling cross the EC Main Line in order to connect the solar stations to the east and west of the EC Main Line.</p>	Noted.
Design and Access	Engineering crossing the railway line.	<p>The Applicant has proposed three methods for crossing the EC Main Line being (1) through existing brick culverts (2) by drilling under the EC Main Line or (3) via the existing bridge deck of the adopted highway (Route Options).</p> <p>The Applicant has not provided sufficient information in its application to justify why all Route Options are necessary, putting pressure on Network Rail to determine which option would be most suitable to protect the integrity of the EC Main Line during the course of the Examination. By not determining which Route Option to pursue, the Applicant is seeking to acquire land which is not required for the development to which the Scheme relates and is doing so without a compelling case in the public interest to justify it. In the view of Network Rail, the third Route Option, which is expected to use the existing bridge deck</p>	<p>The Applicant included three potential options for crossing the main line in the early stages of optioneering as it was not clear which would be mutually acceptable to both NR and the Applicant and the Applicant's engineers have been having a number of discussions with the NR sponsorship and Asset Protection teams as to the option to be pursued, based on best engineering practice and least risk.</p> <p>Currently the Applicant is pursuing a preference for the brick arch culvert option, as there is engineering precedence (due to an existing utility using the same method) and the least engineering risk but this has yet to be agreed by NR.</p> <p>To reiterate, the Applicant will only pursue one option, based on agreement with NR</p>

		<p>of the adopted highway, is the preferred approach for electrical cabling.</p> <p>Network Rail's asset protection team has identified this as the preferred method as little change to existing Network Rail infrastructure would be required, although Network Rail engineers are currently assessing the full impact of this approach.</p>	<p>Engineering as to the best approach. Until this is able to be agreed, all approaches (and the powers required for them) need to form part of the Application. The Applicant will continue to discuss this matter with Network Rail.</p> <p>It should be noted that, in any event, the Applicant is only seeking a cable easement and does not seek to acquire or occupy any Operational Land that is required for NR's undertaking. In this regard, the Applicant's preferred option concerns unused land that is currently overgrown and covered with rubble.</p>
DCO	Compulsory powers, agreements and Protective Provisions	<p>Network Rail considers that there is no compelling case in the public interest for the acquisition of the Compulsory Powers and Network Rail considers that the Secretary of State, in applying section 127 of the Planning Act 2008, cannot conclude that new rights and restrictions over the railway land can be created without serious detriment to Network Rail's undertaking; no other land is available to Network Rail which means that the detriment can be made good by them.</p> <p>Network Rail also objects to all other compulsory powers in the Order to the extent that they affect, and may be exercised in relation to, Network Rail's property and interests. In order for Network Rail to be in a position to withdraw its objection Network Rail requires: (a) agreements with the Applicant that regulate: (i) the manner in which rights over the Plots and any other railway property are acquired and the relevant works are</p>	<p>The Applicant is in discussions with Network Rail with regards to the asset protection agreement and protective provisions, with the aim of reaching agreement before the end of the Examination. The protective provisions secure that no powers may be carried out by the undertaker in respect of Network Rail's interests in any railway property unless the exercise of such powers has been with the consent of Network Rail. The agreements and protective provisions provide for the manner in which rights are acquired, works are carried out and Network Rail's statutory undertaking is safeguarded.</p> <p>The Applicant sent comments on the Protective Provisions to Network Rail on 2 May 2023. The Applicant is awaiting a response from Network Rail. The protective</p>

		<p>carried out including terms which protect Network Rail's statutory undertaking and agreement that compulsory acquisition powers will not be exercised in relation to such land; and (ii) the carrying out of works in the vicinity of the operational railway network to safeguard Network Rail's statutory undertaking; (b) the inclusion of protective provisions in the DCO for its benefit.</p> <p>Network Rail is concerned that no protective provisions for its benefit have been provided for in the Order. Network Rail has received confirmation from the Applicant that it does intend to include protective provisions for Network Rail in the next draft of the Order which Network Rail will then need the opportunity to review and comment on.</p>	<p>provisions have been inserted in Part 7 of the DCO (Rev 1) submitted at Procedural Deadline A to reflect the template provisions for the protection of Network Rail. The <b>Schedule of Changes [EN010127/APP/9.3]</b> contains a summary of the provisions currently under discussion that have not yet been agreed. As set out above, the Applicant is only seeking a cable easement and does not seek to acquire or occupy any Operational Land that is required for NR's undertaking. In this regard, the preferred option is to acquire a new easement over unused land that has no practical operational benefit to NR.</p>
DCO	Schedule 3	<p>Network Rail is also concerned that as per Schedule 3 of the draft Order, the Applicant is seeking to disapply certain railway legislation, being the Eastern Midlands Railway (Extensions) Act 1988, the Great Northern Railway (Junctions) Act 1865 and the Bourn and Essendine Railway Act 1857. This legislation provides Network Rail with a series of rights and responsibilities which allow Network Rail to carry out its statutory undertaking in respect of the regions covered by the aforementioned legislation.</p>	<p>The Applicant is seeking to disapply a number of statutory provisions in accordance with section 120(5) of the Planning Act 2008. The Applicant is engaging with Network Rail on protective provisions and framework agreements with an aim of reaching agreement before the end of Examination. Such agreements will enable Network Rail to carry out its statutory undertaking across the Order limits.</p>
Examination		<p>Network Rail requests that the Examining Authority treat Network Rail as an Interested Party for the purposes of the Examination and reserves the right to produce additional grounds of concern when further details of the Scheme and its effects on Network Rail's land are available.</p>	<p>Noted.</p>

**Cadent Gas Limited (RR- 0126)**

<b>Topic</b>	<b>Theme</b>	<b>Statutory Consultee Comment</b>	<b>MPSF Response</b>
DCO and Agreements	Utilities asset Protection	Cadent wishes to make a relevant representation to the DCO in order to protect its position in light of infrastructure which is within or in close proximity to the proposed DCO boundary. Cadent's rights to retain its apparatus in situ and rights of access to inspect, maintain, renew and repair such apparatus located within or in close proximity to the order limits should be maintained at all times and access to inspect such apparatus must not be restricted.	Noted.
DCO and Agreements	Protective Provisions	The documentation and plans submitted for the above proposed scheme have been reviewed in relation to impacts on Cadent's existing apparatus located within this area, and Cadent has identified that it will require adequate protective provisions to be included within the DCO to ensure that its apparatus and land interests are adequately protected and to include compliance with relevant safety standards.	The Applicant is in discussions with Cadent with regard to the protective provisions, with the aim of reaching agreement before the end of the Examination.  The Applicant sent comments on the Protective Provisions to Cadent Gas Limited on 14 April 2023. The Applicant is awaiting a response from Cadent Gas Limited. Part 8 of the DCO (Rev 1) submitted at Procedural Deadline A has been updated to reflect the latest position and will be updated further to reflect the protective provisions once agreed. The Schedule of Changes [EN010127/APP/9.3] contains a summary of
DCO and Agreements	Protective Provisions	Cadent has a high pressure gas pipeline and associated apparatus including cathodic protection apparatus, transformer kiosk and groundbed located within the order limits which may be affected by works proposed and Cadent will therefore require further consultation with the Promoter prior to construction to ensure its network is adequately protected.	

			the provisions currently under discussion that have not yet been agreed.
DCO and Agreements	Protective Provisions	As a responsible statutory undertaker, Cadent's primary concern is to meet its statutory obligations and ensure that any development does not impact in any adverse way upon those statutory obligations. Adequate protective provisions for the protection of Cadent's statutory undertaking are therefore required and are in discussion between parties but not yet agreed.	Noted.

**UK Health Security Agency (UKHSA) (RR-1188)**

Topic	Theme	Statutory Consultee Comment	MPSF Response
People and Community	Public Health	Please note that we request views from the Office for Health Improvement and Disparities (OHID) and the response provided is sent on behalf of both UKHSA and OHID. We can confirm that: With respect to Registration of Interest documentation, we are reassured that no issues remain outstanding. In addition, we acknowledge that the Environmental Statement (ES) has not identified any issues which could significantly affect public health.	Noted.
People and Community	Public Health	Following our review of the submitted documentation we are satisfied that the proposed development should not result in any significant adverse impact on public health. On that basis, we have no additional comments to make at this stage and can confirm that we have chosen not to register an interest with the Planning Inspectorate on this occasion.	Noted.

**Anglian Water (RR-0062)**

Topic	Theme	Statutory Consultee Comment	MPSF Response
Scoping	Socio-economic scoping impacts	<p>We note that the applicant is seeking to identify where Anglian Water assets are impacted by the proposed scheme. The process for seeking that information is set out in Anglian Water's Scoping response at page 2 of the Appendix 2 of the March 2022 Scoping Opinion including contacts for progressing investigations. That Scoping response also seeks to ensure that the project sets out any impacts on Rutland Water including socio-economic impacts.</p>	Noted.
DCO and Agreements	Protective Provisions	<p>In terms of Protective Provisions, we note that paragraph 3.3.5 of the Explanatory Memorandum states that the applicant is seeking to agree Protective Provisions with Statutory Undertakers.</p> <p>Schedule 15 Part 1 contains generic Protective Provisions for utility providers which do not reflect the model Protective Provisions that Anglian Water has previously shared with the applicant.</p>	<p>The Applicant is in discussions with Anglian Water with regard to the protective provisions, with the aim of reaching agreement before the end of the Examination.</p> <p>The Applicant sent comments on the protective provisions to Anglian Water on 10 January 2023. The Applicant is awaiting a response from Anglian Water. Part 6 of the DCO (Rev 1) submitted at Procedural Deadline A has been updated to reflect the latest position and will be updated further to reflect the protective provisions once agreed. The Schedule of Changes [EN010127/APP/9.3] contains a summary of</p>

			the provisions currently under discussion that have not yet been agreed.
DCO and Agreements	Protective Provisions	In addition, with respect to Schedule 16 of the same draft order, Anglian Water should be a consultee for any Local Planning Authority discharge of requirements in relation to drainage plans and surface water discharge. Any impacted Anglian Water assets need to be identified and either diverted or protected.	<p>The Proposed Development will not impact Anglian Water's assets as surface water will be discharged to watercourses and not Anglian Water's assets.</p> <p>The Outline Surface Water Drainage Strategy [APP-087] at section 5 states that foul water associated with the Proposed Development will be stored via an onsite foul solution, which will either be taken offsite by a licensed carrier or managed through an appropriate permit and section 6 states that a connection to an existing clean water outlet via Anglian Water is not feasible. The Surface Water Drainage Strategy is secured by Requirement 9 of the draft DCO (Rev 1) submitted at Procedural Deadline A.</p> <p>Therefore, Anglian Water does not need to be included as a consultee in Schedule 16 of the draft DCO.</p>
Agreement	SoCG	We note the Wilsthorpe Borehole is just outside the order limits and the DCO documentation confirms there is no planned disruption to the access from Carlby Road. Anglian Water has contacted the applicant separately with the intention of agreeing a Statement of Common Ground.	<p>The Applicant is currently preparing a draft Statement of Common Ground with Anglian Water which will be share by the Preliminary Hearings.</p> <p>The Applicant is in discussions with Anglian Water with regard to the protective</p>



			provisions, with the aim of reaching agreement before the end of the Examination.
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**Black Sluice Internal Drainage Board (RR-0110)**

Topic	Theme	Statutory Consultee Comment	MPSF Response
Water Resources and Ground Conditions	Drainage	The Black Sluice Internal Drainage Board has an interest in this project for any matters concerning the Land Drainage Act 1991 (as amended) with regard to any works within any ordinary watercourse (Section 23 Land Drainage Consent).	<p>Noted. The Applicant has disapplied section 23 Land drainage consent provisions and is working with the LLFA to ensure that they are content with this position. As outlined in Paragraph 11.2.43 of in Chapter 11 of the Environmental Statement [APP-041] Consultations with Lincolnshire County Council (LCC) have confirmed that LCC have a memorandum of understanding with Internal Drainage Boards (IDBs) within the area to extend their operational ownership across the whole of Lincolnshire. The Order limits are shown to fall within the extended management boundaries of the Black Sluice and Upper Whitham IDB. Consultations with LCC has confirmed that IDB consents and byelaws are not applicable for the extended operational areas which the Order limits falls within.</p> <p>The Applicant consulted with the IDBs prior to submission of the DCO Application to discuss buffers to watercourses and consenting requirements in the context of the DCO application, noting that, further to the disapplication of section 23 in the draft DCO, the assets within this IDB will be</p>

			protected by the LLFA's role in discharging the surface water drainage strategy for the Proposed Development.
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**National Gas Transmission Plc (NGT) (RR-0819)**

Topic	Theme	Statutory Consultee Comment	MPSF Response
DCO and Agreements	Appropriate protection and access to apparatus	<p>NGT will require appropriate protection for retained apparatus including compliance with relevant standards for works proposed within close proximity of its apparatus.</p> <p>NGT's rights of access to inspect, maintain, renew and repair such apparatus must also be maintained at all times and access to inspect and maintain such apparatus must not be restricted.</p>	Noted.
Land and Property	Protection provisions and agreements	Further, where the Applicant intends to acquire land or rights, or interfere with any of NGT's interests in land or NGT's apparatus, NGT will require appropriate protection and further discussion is required on the impact to its apparatus and rights.	Noted.
Land and property; Statutory Undertakers	Design and interaction with existing apparatus	<p>NGT has two high pressure gas transmission pipelines located within or in close proximity to the proposed Order Limits. These transmission pipelines form an essential part of the gas transmission network in England, Wales and Scotland:</p> <ul style="list-style-type: none"> <li>• Feeder Main 9 – Kirkby Underwood to Tallington</li> <li>• Feeder Main 22 – Aslackby to Braceborough</li> </ul> <p>Protection of NGT Gas Assets: As a responsible statutory undertaker, NGT's primary concern is to meet its statutory obligations and ensure that any development does not impact in any adverse way upon those statutory obligations.</p>	Noted.

		<p>As such, NGT has a duty to protect its position in relation to infrastructure and land which is within or in close proximity to the draft Order Limits. As noted, NGT's rights to retain its apparatus in situ and rights of access to inspect, maintain, renew and repair such apparatus located within or in close proximity to the Order Limits should be maintained at all times and access to inspect and maintain such apparatus must not be restricted.</p>	
DCO and schedules	Protection Provisions	<p>NGT will require protective provisions to be included within the draft Development Consent Order (the "Order") for the Project to ensure that its interests are adequately protected and to ensure compliance with relevant safety standards. NGT is liaising with the Applicant in relation to such protective provisions, along with any supplementary agreements which may be required.</p> <p>NGT requests that the Applicant continues to engage with it to provide explanation and reassurances as to how the Applicant's works pursuant to the Order (if made) will ensure protection for those NGT assets which will remain in situ, along with facilitating all future access and other rights as are necessary to allow NGT to properly discharge its statutory obligations. NGT will continue to liaise with the Applicant in this regard with a view to concluding matters as soon as possible during the DCO Examination and will keep the Examining Authority updated in relation to these discussions.</p> <p>Compulsory Acquisition Powers in respect of the Project: As noted, where the Applicant intends to acquire land or rights, or interfere with any of NGT's interests in land, NGT will require further discussion with the Applicant.</p>	<p>The Applicant is in discussions with NGT with regard to the protective provisions and will continue to engage with NGT with the aim of reaching agreement before the end of the Examination.</p> <p>The Applicant sent comments on the protective provisions to NGT on 26 April 2023. The Applicant is awaiting a response from NGT. Part 3 of the DCO (Rev 1) submitted at Procedural Deadline A has been updated to reflect the latest position and will be updated further to reflect the protective provisions once agreed. The <b>Schedule of Changes [EN010127/APP/9.3]</b> contains a summary of the provisions currently under discussion that have not yet been agreed.</p>

**National Grid Electricity Distribution (East Midlands) plc (RR-0820)**

<b>Topic</b>	<b>Theme</b>	<b>Statutory Consultee Comment</b>	<b>MPSF Response</b>
Land and Property; Design	NGED asset's relationship to the proposed design	The application includes land in or upon which NGED has assets which consists of high-voltage electricity cables. NGED has reviewed the draft Order setting out the Authorised Development to establish the extent to which their apparatus and interests are affected and has discussed the proposed Authorised Development with the applicant.	Noted.
DCO and requirement	Protective Provisions	<p>Whilst NGED has had positive engagement with the applicant in relation to the project, NGED needs to ensure that the wider powers being sought in the Order will not have a detrimental impact on NGED's electricity network and its duties under the EA1989, including ensuring that the terms of the proposed protective provisions are acceptable.</p> <p>NGED is therefore making this representation as a holding objection to the application until asset protection arrangements have been agreed between the parties. No formal agreement has yet been concluded and accordingly we are lodging this representation to protect NGED's position pending conclusion of an appropriate agreement.</p>	Noted. The Protective Provisions have been agreed with NGED on 14 April 2023 and will be appended to the Asset Protection Agreement. The Applicant is continuing discussions with NGED to agree the provisions within the Asset Protection Agreement and will continue to engage with NGED with the aim of reaching agreement on the Asset Protection Agreement before the end of the Examination.
DCO and requirement	Protective Provisions	Once NGED is satisfied that its network is protected, we will notify the Planning Inspectorate promptly and withdraw the objection.	Noted.

**National Grid Electricity Transmission Plc (RR-0821)**

Topic	Theme	Statutory Consultee Comment	MPSF Response
DCO and Agreements	Protective Provisions and other agreements	<p>National Grid will require appropriate protection for retained apparatus including compliance with relevant standards for works proposed within close proximity of its apparatus.</p> <p>National Grid’s rights of access to inspect, maintain, renew and repair such apparatus must also be maintained at all times and access to inspect and maintain such apparatus must not be restricted.</p> <p>Further, where the Applicant intends to acquire land or rights, or interfere with any of National Grid’s interests in land or National Grid’s apparatus, National Grid will require appropriate protection and further discussion is required on the impact to its apparatus and rights.</p>	<p>The Applicant is in discussions with National Grid with regard to the protective provisions, with the aim of reaching agreement before the end of the Examination.</p> <p>The Applicant sent comments on the protective provisions to National Grid on 26 April 2023. The Applicant is awaiting a response from NG. Part 4 of the DCO (Rev 1) submitted at Procedural Deadline A has been updated to reflect the latest position and will be updated further to reflect the protective provisions once agreed. The <b>Schedule of Changes [EN010127/APP/9.3]</b> contains a summary of the provisions currently under discussion that have not yet been agreed.</p>
Design; Land and Property	Works plan and detailed design	<p>Further detail is set out below. National Grid infrastructure within/in close proximity to the proposed Order Limits</p> <p>National Grid owns or operates the following infrastructure within or in close proximity to the proposed Order Limits for the Project:</p>	Noted

		<p>NGET has a substation, high voltage cables and a high voltage electricity overhead transmission line within or in close proximity to the proposed Order Limits.</p>	
Design; Land and Property	Works plan and detailed design	<p>This apparatus forms an essential part of the electricity transmission network in England and Wales. The details of the electricity assets are as follows:</p> <p>Substations</p> <ul style="list-style-type: none"> <li>• Ryhall 400kV Substation</li> <li>• Essendine 25kV Substation Overhead Lines</li> <li>• 4VK 400kV overhead line Underground Cables</li> <li>• Essendine to Ryhall Cable Circuits</li> <li>• Associated fibre cables</li> </ul> <p>As a responsible statutory undertaker, National Grid's primary concern is to meet its statutory obligations and ensure that any development does not impact in any adverse way upon those statutory obligations.</p> <p>As such, National Grid has a duty to protect its position in relation to infrastructure and land which is within or in close proximity to the draft Order Limits.</p>	Noted.
DCO and Agreements	Protective Provisions and other agreements	<p>As noted, National Grid's rights to retain its apparatus in situ and rights of access to inspect, maintain, renew and repair such apparatus located within or in close proximity to the Order Limits should be maintained at all times and access to inspect and maintain such apparatus must not be restricted.</p>	The Applicant is currently in discussions with National Grid regarding protective provisions, with the aim to reach agreement before the end of Examination.



DCO and schedules	Protective Provisions	National Grid will require protective provisions to be included within the draft Development Consent Order (the "Order") for the Project to ensure that its interests are adequately protected and to ensure compliance with relevant safety standards.	The Applicant sent comments on the protective provisions to National Grid on 26 April 2023. The Applicant is awaiting a response from NG. Part 4 of the DCO (Rev 1) submitted at Procedural Deadline A has been updated to reflect the latest position and will be updated further to reflect the protective provisions once agreed. The <b>Schedule of Changes [EN010127/APP/9.3]</b> contains a summary of the provisions currently under discussion that have not yet been agreed.
DCO and Agreements	Protective Provisions and other agreements	National Grid is liaising with the Applicant in relation to such protective provisions, along with any supplementary agreements which may be required.	
DCO and schedules	Works	National Grid requests that the Applicant continues to engage with it to provide explanation and reassurances as to how the Applicant's works pursuant to the Order (if made) will ensure protection for those National Grid assets which will remain in situ, along with facilitating all future access and other rights as are necessary to allow National Grid to properly discharge its statutory obligations.	
DCO and Agreements	Protective Provisions and other agreements	National Grid will continue to liaise with the Applicant in this regard with a view to concluding matters as soon as possible during the DCO Examination and will keep the Examining Authority updated in relation to these discussions.	Noted.
Land and Property	Compulsory Acquisition Powers	Compulsory Acquisition Powers in respect of the Project: As noted, where the Applicant intends to acquire land or rights, or interfere with any of National Grid's interests in land, National Grid will require further discussion with the Applicant. National Grid reserves the right to make further representations as part of the Examination process in relation to specific interactions with its assets but in the meantime will continue to liaise with the Applicant with a view to reaching a satisfactory agreement.	Noted.

DCO and Agreement	Commercial Agreements	Connections: The Project proposes a connection to Ryhall substation. In relation to this connection National Grid is working with the Applicant to enter into connection agreements and other commercial arrangements at the relevant time.	The Applicant will enter into connection agreements and other commercial arrangements with National Grid when required.
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**The Forestry Commission (RR-0339)**

<b>Topic</b>	<b>Theme</b>	<b>Statutory Consultee Comment</b>	<b>MPSF Response</b>
Ecology and Biodiversity	Impact on Ancient Woodland	While we are pleased to note that field number 37, which is the nearest section of the site to Braceborough Little Wood Ancient Woodland is now designated as a mitigation and enhancement area.	Noted.
Land and Property	Compulsory Acquisition	<p>However, we also note that Field 33 (retained arable field parcel with skylark plots) and the majority of Field 34 (grazed grassland with PV arrays) next to Park Farm are both land still in obligation to the Farm Woodland Premium Scheme (FWPS) having received public funding to establish or manage a woodland on the site.</p> <p>The landowner is expected to meet all of the Terms and Conditions of the agreement contract. Failure to do so is likely to require the Forestry Commission to seek to recover all of the relevant grant that has been paid.</p>	The Applicant will be discussing this issue with the landowners as the issue here is purely a financial one in terms of whether or not the Applicant or the landowners will be liable for repayment of previous grant funding (whether that is because the trees in question are outside of their 'obligation' period to be retained or because of the different terms and conditions that apply to each funding scheme). This is a purely financial matter between the parties and is therefore not relevant to planning considerations of the Scheme.



**APPENDIX 3 - APPLICANT'S RESPONSES TO THE RELEVANT REPRESENTATIONS  
SUBMITTED BY PARISH COUNCILS AND ONE NEIGHBOURING LOCAL AUTHORITY.**

Response to LPA relevant representations

<b>Bainton and Ashton Parish Council (RR-0087)</b>			
<b>Topic</b>	<b>Theme</b>	<b>Statutory Consultee Comment</b>	<b>MPSF Response</b>
Project size and design	Size and scale	The development is very near to the parish and residents hold strong views on it as it is so vast and widespread and are interested in the progress of such a project.	Noted.

**Carlby Parish Council (RR-1031)**

Topic	Theme	Statutory Consultee Comment	MPSF Response
Project size and design	Size and scale	Public meeting a high percentage of the parishioners of Carlby Village are against this Mallard Pass Solar factory on the ground of the huge scale of this project in the rural landscape.	<p><b>Section 3.3 of the Statement of Need [APP-202]</b> describes Government’s view that large capacities of low-carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that “a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar”.</p> <p>Further, <b>Section 7.6 of the Statement of Need</b> analyses the potential contribution of “brownfield” solar sites to the national need for solar generation. Brownfield sites, including rooftop and other community energy systems, are likely to grow in the UK and will make a contribution to decarbonisation of the UK energy system. However the <b>Statement of Need</b> concludes that on their own, brownfield developments are unlikely to be able to meet the national need for solar. <b>Section 8.5 of the Statement of Need</b> therefore describes and agrees with Government’s view that decentralised and community energy systems are unlikely to lead to the significant replacement of large-scale infrastructure.</p> <p>It is the Applicant’s view (and this aligns with Government’s view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p> <p><b>Section 7.5 of the Statement of Need [APP-202]</b> describes the site selection process for large scale</p>

			<p>solar developments in the UK. In particular, <b>Paragraph 7.5.6</b> describes that suitable sites for solar developments “require three fundamental attributes” – being the availability of sufficient land; availability and capacity for grid connection; and acceptable irradiation yields. <b>Figure 7.4</b> and <b>Sections 9.2 and 9.4</b> of the <b>Statement of Need</b> describe the suitability of the local area for large scale solar infrastructure projects. <b>Section 8.7</b> describes the concept of local specificity, which suggests that provided suitable land parcels can be identified and secured for large scale solar in the local area, then the local area is highly suitable for large-scale solar development and therefore is likely to attract large-scale solar projects to the area and that these projects will be essential for the decarbonisation of the UK electricity sector.</p> <p>The Applicant understands the strength of feeling within the community, and has designed the scheme to minimise the impacts to the local community, and to provide benefits. However, fundamentally, the Applicant is helping provide a response to urgent need for low carbon energy generation in the UK, as set out in the Statement of Need <b>[APP-202]</b>, and the Site Selection Assessment <b>[APP-203]</b> explains why the location of the Proposed Development is an appropriate site for a large scale solar project to form part of meeting that need.</p>
Landscape and Visual	Impact on the landscape character	Many of the sites for solar arrays are on gentle rolling landscape and will be highly visible from a wide area. Residents raised various issues against this project and	The potential impacts to the landscape and visual resource, has been comprehensively assessed in accordance with best practice guidance and informed by consultation with stakeholders. The

		<p>as a Parish Council we would like to represent residents collectively against this project.</p>	<p>results of this assessment are set out in detail within the LVIA [APP-036], with limited localised residual adverse impacts identified.</p> <p>The Design and Access Statement [APP-204] sets out the design of the Proposed Development has responded to its specific context, including the Design Principles which have informed the design.</p> <p>The Green Infrastructure Strategy Plan [APP-173], Figure 6.11 of the LVIA, the Outline Landscape and Ecology Management Plan [APP-210] and the Work Plans [APP-006] illustrate the areas near to settlements proposed as Mitigation and Enhancement Areas and detail how the retained and new planting proposed will be managed to enhance visual screening where required.</p>
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**Langtoft Parish Council (RR-0619)**

Topic	Theme	Statutory Consultee Comment	MPSF Response
Land use and Soil	Productive of Farmland and impact on the countryside	In this area of Lincolnshire and Rutland we have several applications pending, all impacting on the countryside and taking productive farmland out of production for food.	<p>We are aware that Mallard Pass Solar Farm is one of several Nationally Significant Infrastructure Projects within Lincolnshire. This is primarily due to; the existing National Grid infrastructure and capacity to accommodate new connections and the generally favorable topography and irradiance levels. We note the reference to potential impacts on countryside and agricultural land which are assessed in the following Environmental Statement chapters:</p> <ul style="list-style-type: none"> <li>• Landscape and Visual [APP-036]</li> <li>• Ecology and Biodiversity [APP-037]</li> <li>• Land Use and Soils [APP-042]</li> </ul> <p>In addition, Draft NPS-3 advises that, where possible, applicants should seek to utilise previously developed land, brownfield land, contaminated land and industrial land. However, policy recognises that at utility scale it is likely that some developments may use agricultural land and that land type should not be a predominating factor in determining the suitability of the site location.</p> <p>Consideration of the food production and economic implications of the use of the BMV land for the Proposed Development compared to the production from poorer quality land are set out in the ES at sections 12.4.83 and Table 12-11 [APP-114]. In short, the Applicant considers that the Proposed Development does not impact upon food security.</p>

Mineral Safeguarding	Gravel extension for quarrying aggregate	In Langtoft we have had numerous call for sites for gravel extension for quarrying aggregate and our neighbouring parishes have the Mallard Solar Factory.	Noted.  A Mineral Impact Assessment is included in Appendix 4 of the Planning Statement [APP-203] and concludes no material impacts upon minerals resources.
Environmental Impacts	Noise, Health and Well-being, Traffic and highway safety, flooding, and Landscape and visual.	All combined this is a huge impact on residents in this area of the country in the form of noise pollution, health, and wellbeing for the use of the countryside for amenities, extra traffic implications and highway safety, layout and density of the areas concerns, risk of flooding and the complete devastation of the landscape.	All of these matters have been assessed in the Environmental Statement, and with the exception of some localised landscape and visual impacts (which NPS EN-1- recognises may be necessary in order to ensure that much needed energy infrastructure is delivered), no significant impacts have been identified.

**Ryhall Parish Council (RR-1019)**

Topic	Theme	Statutory Consultee Comment	MPSF Response
Project size and design	Size and scale	<p>Ryhall Parish Council have canvassed residents of the Parish who, in the majority, are against the Mallard Pass Solar factory.</p> <p>The main reasons being the impact on the surround landscape with its mass blocked layout of solar arrays.</p>	<p>The potential impacts on the landscape and visual resources, have been comprehensively assessed in accordance with best practice guidance and informed by consultation with stakeholders.</p> <p>The results of this assessment are set out in detail within the LVIA [APP-036].</p> <p>The Design and Access Statement [APP-204] sets out how the design of the proposed development has responded to its context, including the design principles which have informed the design.</p> <p>The character and appearance of the Order limits would change from arable farmland to a utility-scale solar PV development. However, due to landform and the framework of woodlands, treebelts and hedgerows proposed, the Solar PV Site would appear subdivided and compartmentalised.</p> <p>The mass, scale and form of the Solar PV Site and Onsite Substation would not be viewed as a continuous block of development as the 'modular' characteristics of solar development allow it to sit within the existing landscape fabric ed . These factors would assist to reduce the overall perceived scale of the development.</p> <p>The Green Infrastructure Strategy Plan [APP-173], Figure 6.11 of the LVIA, the Outline Landscape and</p>

			<p>Ecology Management Plan <b>[APP-210]</b> and the Work Plans <b>[APP-006]</b> illustrate the areas near to settlements proposed as Mitigation and Enhancement Areas and detail how the retained and new planting proposed will be managed.</p> <p>There is an urgent need for renewable energy projects to deliver the Government’s legally binding commitment to net zero, which cannot be reached with the delivery of small sites alone – projects are needed to deliver energy at scale, as discussed in the section 8.5 <b>Statement of Need [APP-202]</b>, which concludes that the development of large sites (which connect to the transmission network) is essential in order to connect the scale of new capacity required to meet Net Zero requirements. On this basis, the emphasis should be on maximising the use of available capacity at grid connections where they occur. Consideration was therefore given to areas in the UK where grid connections were available and that were suitable for solar development.</p>
Land use and Soil	Loss of productive land and food security	Also, the taking out of productive land for food production at a time of food insecurity, also the impact on the natural environment and wildlife movement in the surrounding area.	<p>Chapter 7: Ecology and Biodiversity, of the ES <b>[APP-037]</b>, presents the approach and findings of the assessment of potential impacts on Ecology and Biodiversity. This has concluded that there will not be any significant impacts on any ecological feature.</p> <p>The proposed development will result in the temporary use of some higher grade (BMV) agricultural land being temporarily used to locate solar arrays. The amount of BMV land used has sought to be minimized throughout the design development process, however, it will be possible</p>

			<p>for grazing of sheep to continue beneath the solar arrays.</p> <p>Consideration of the food production and economic implications of the use of the BMV land for the Proposed Development compared to the production from poorer quality land are set out in the ES at sections 12.4.83 and Table 12-11 <b>[APP-114]</b>.</p> <p>The incremental reduction of crop production from the BMV land compared to non-BMV land is of the order of 250 tonnes (ES 12.4.84) from an annual production of 21million tonnes (ES 12.4.76).</p> <p>There are no policies or obligations to farm agricultural land in any particular farming manner or to any particular crop or stocking, see the ES Chapter 12 at 12.4.67 and 68.</p> <p>Agricultural use in the form of livestock grazing will continue under and around the panels, and on retained agricultural land.</p> <p>In short, the Applicant considers that the Proposed Development will not have an impact to food security.</p>
Landscape and Visual; Ecology and Biodiversity	Visual impact on the landscape and SSSI sites/ ancient woodland	The solar arrays are planned to be sited in many areas in a very visible rolling landscape, close to SSSI sites and ancient woodland.	The potential impacts to the landscape and visual resource has been comprehensively assessed in accordance with best practice guidance and informed by consultation with stakeholders. The results of this assessment are set out in detail within Chapter 6: Landscape and Visual, of the ES <b>[APP-</b>

			<p><b>036]</b> with limited residual localised and adverse effects identified.</p> <p>It is also noted that whilst this solar farm is of a utility scale, the overall scale of the development would appear subdivided and compartmentalised by the landform, woodland, and hedgerows such that it would not be entirely visible from any given location. The Scheme will also be decommissioned in the future, meaning that impacts will be reversible.</p> <p>The Design and Access Statement <b>[APP-204]</b> sets out how the design of the Proposed Development has responded to its context, including the Design Guidance applied to Ancient Woodland and SSSIs in terms of offsets and planting where appropriate.</p> <p>The Green Infrastructure Strategy Plan <b>[APP-173]</b>, Figure 6.11 of the LVIA, the Outline Landscape and Ecology Management Plan <b>[APP-210]</b> and the Work Plans <b>[APP-006]</b> illustrate the areas near to settlements proposed as Mitigation and Enhancement Areas and detail how the retained and new planting proposed will be managed.</p>
Transport and Highways	Construction traffic	A huge impact on ours and our neighbouring parishes living conditions, increase in construction traffic on inappropriate lanes.	Construction vehicles will only use the permitted routes to access the Order Limits. This will be secured by way of requirement in the DCO through the final CTMP. Breaching the requirements of the DCO is a criminal offence. These routes are described in detail within the oCTMP <b>[APP-212]</b>

			<p>The one-way routing and use of a consolidation strategy reduces the likelihood of any two-way conflicts between construction vehicles.</p> <p>Passing places will be introduced along Uffington Lane to help facilitate two-way flows for the construction phase, as well as minor widening works to the A6121 / Uffington Lane priority junction. More details are provided within Appendix 9.4 of ES Chapter 9 <b>[APP-074]</b></p>
Project size and design	Size and scale	<p>In this area, bordering Stamford, the farmland is also being under threat of 1300 housing development. How much more devastation of our landscape can residents be asked to endure. Many of our residents feel they are unable to fight this application and feel unempowered to have their voices heard, so it is the Parish Council's role to help them be heard.</p>	<p>The Stamford North planning application is identified within the Long List of cumulative developments (number 64) set out in Appendix 2.4 of the ES <b>[APP-052]</b>. The development was shortlisted for assessment because there is potential for a temporal overlap of effects, the proposal is located within the Zone of Interest of a number of environmental topics, it is of scale and there is potential for cumulative effects. A Cumulative Impact Assessment is included in Chapter 16 of the ES <b>[APP-046]</b>, and considers the cumulative impacts the Proposed Development with that of the proposed Stamford North planning application. The cumulative effects on landscape and visual are presented within Table 16.3 in the ES and it concludes that the Stamford North proposal, due to its distance from the Proposed Development and the intervening landform, woodland or settlements, is unlikely to incur any significant cumulative landscape and visual effects.</p>

**Clipsham Parish Meeting - Rutland (RR-0192)**

Topic	Theme	Statutory Consultee Comment	MPSF Response
Project size and design	Size and scale	We believe that the massive scale of this development is highly damaging for Rutland.	<p><b>Section 8.5 of the Statement of Need [APP-202]</b> describes and agrees with Government’s view that decentralised and community energy systems are unlikely to lead to the significant replacement of large-scale infrastructure. It is the Applicant’s view (and this aligns with Government’s view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p> <p>As discussed in section 8.5 <b>Statement of Need [APP-202]</b>, which concludes that the development of large sites (which connect to the transmission network) is essential in order to connect the scale of new capacity required to meet Net Zero requirements. On this basis, the emphasis should be on maximising the use of available capacity at grid connections where they occur. Consideration was therefore given to areas in the UK where grid connections were available and that were suitable for solar development.</p> <p><b>Section 8 of the Planning Statement</b> concludes with a consideration of the Planning Balance and justifies how the overwhelming national need, as demonstrated in the <b>Statement of Need [APP-202]</b> outweighs any potential significant adverse impacts which, as the <b>Environmental Statement [APP-047]</b> sets out, are limited.</p> <p>The Applicant understands the strength of feeling within the community, and has designed the scheme</p>



			to minimise the impacts to the local community, and to provide benefits. However, fundamentally, the Applicant is helping provide a response to urgent need for low carbon energy generation in the UK, as set out in the Statement of Need [APP-202], and the Site Selection Assessment [APP-203] explains why the location of the Proposed Development is an appropriate site for a large scale solar project to form part of meeting that need.
General	Impact on the community due to the loss of the following Agricultural Land, Natural character Landscape, biodiversity and historical assets.	The development would lead to irreversible damage to the community due to the loss of quality, productive agricultural land, the loss of the natural character of the landscape and countryside, lasting damage to biodiversity and the environment, and damage to historical assets and identity.	These matters have all been assessed in the Environmental Statement, with no adverse effects identified for biodiversity and heritage, localised limited landscape and visual impacts identified , and a small amount of agricultural land impacts (assessed on a precautionary worst case basis) identified.
Land and property	Compulsory purchase and disruption	There are risks of compulsory purchase and unacceptable disruption to the lives and livelihoods of many individuals and businesses over a period of many years, within a wide area of these proposals.  This proposal has the potential to offend the natural laws of this Country.	The use and application of compulsory acquisition powers are considered the last resort to secure the land and rights needed for the Proposed Development.  Where the Applicant is seeking powers of compulsory acquisition, the Applicant's preference is to negotiate the acquisition of land and/or interests in land and enter into a voluntary agreement with the landowner. The Applicant remains committed to acquiring all land and rights by voluntary agreement in the first instance however it requires the powers of compulsory acquisition sought in order to provide certainty that they will have all the land required to construct and operate the Proposed Development.

			<p>The description of the plots in the <b>Book of Reference [APP-023]</b> makes clear that no properties are proposed to be subject to the land powers in the DCO.</p>
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**Tallington Parish Council (RR-XX)**

Topic	Theme	Statutory Consultee Comment	MPSF Response
Project size and design	Size and scale	<p>Although TPC recognizes that there is need for rapid growth of solar and wind power so that the area and country can become more energy self-sufficient, the TPC do have concerns over the large development of this scheme.</p>	<p><b>Section 3.3 of the Statement of Need [APP-202]</b> describes the Government’s view that large capacities of low-carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that “a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar”.</p> <p>The <b>Statement of Need</b> also concludes that on their own, brownfield developments are unlikely to be able to meet the national need for solar. <b>Section 8.5 of the Statement of Need</b>, therefore, describes and agrees with the Government’s view that decentralised and community energy systems are unlikely to lead to the significant replacement of large-scale infrastructure.</p> <p>It is therefore the Applicant’s view (and this aligns with Government’s view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p> <p><b>Section 7.5 of the Statement of Need [APP-202]</b> describes the site selection process for large scale solar developments in the UK. In particular, <b>Paragraph 7.5.6</b> describes those suitable sites for solar developments “require three fundamental attributes” – the availability of sufficient land; availability and capacity for grid connection; and acceptable irradiation yields. <b>Figure 7.4 and Sections</b></p>

			<p><b>9.2 and 9.4</b> of the <b>Statement of Need</b> describe the suitability of the local area for large scale solar infrastructure projects. <b>Section 8.7</b> describes the concept of local specificity, which suggests that provided suitable land parcels can be identified and secured for large scale solar in the local area, then the local area is highly suitable for large-scale solar development and therefore is likely to attract large-scale solar projects to the area and that these projects will be essential for the decarbonisation of the UK electricity sector</p>
General	Size and Scale, Impact on Habitat, traffic and transport, impact of construction, flooding, cultural heritage,	There are many factors requiring clearer explanation by the developers. These include – the general large size, performance and location, the way batteries to be used will be stored, bio diversity and loss of habitat, impact on local traffic and transport, impact on recreational facilities, construction issues, potential flooding impact, archaeology and heritage disturbance.	<p>These matters have all been assessed in the Environmental Statement, with no adverse effects identified for biodiversity, traffic, water and heritage matters, localised limited landscape and visual impacts identified , and a small amount of agricultural land impacts (assessed on a precautionary worst case basis) identified. The Proposed Development does not include any batteries.</p>
Land use and Soil	Loss of productive land and food security	A key over-riding concern is the intention to redefine use of a significant area of agricultural land away from food related production.	<p>Draft NPS-3 advises that, where possible, applicants should seek to utilise previously developed land, brownfield land, contaminated land and industrial land. However, policy recognises that at utility scale it is likely that some developments may use agricultural land and that land type should not be a predominating factor in determining the suitability of the site location. Consideration of the food production and economic implications of the use of the BMV land for the Proposed Development compared to the production from poorer quality land are set out in the ES at sections 12.4.83 and</p>

			<p>Table 12-11 <b>[APP-114]</b>. In short, the Applicant considers that the Proposed Development does not impact upon food security which is not in any event a planning policy matter.</p> <p>The use of the land for solar arrays also permits certain types of agricultural use to continue, for example sheep farming (as set out in the Environmental Statement, APP-114).</p>
General comment		<p>Considerable further re-assurance is required, therefore, by the scheme developers not only to Tallington residents but also to all other neighboring villages to enable our support for this scheme to proceed. Consequently, TPC are opposed to this proposed development.</p>	<p>Noted. The Applicant will continue to engage with affected parties.</p>

**Carlby with Aunby and Holywell Parish Council (RR-0128)**

Topic	Theme	Statutory Consultee Comment	MPSF Response
Project location and size	Location	This development is in the wrong place. It has been 'shoehorned' into land as close as possible to the existing substation nr. Ryhall that feeds the East Coast Main line to make maximum profit for the developers.	<p><b>Paragraphs 3.3.17-18 of the Statement of Need [APP-202]</b> explains Government's view that irradiance, site topography and proximity to suitable connection points to the transmission network, are likely to be key inputs to site selection. <b>Section 7.5 of the Statement of Need</b> describes the site selection process for large-scale solar more fully, and <b>Section 7.7 of the Statement of Need</b> sets out how the design of the Proposed Development seeks to maximise utilisation of the grid connection capacity available at Ryhall Substation.</p> <p>The Site Selection Assessment <b>[APP-203]</b> explains how the Proposed Development site was determined, considering all relevant factors.</p>
Land use and Soil	Loss of productive land	Much valuable arable land will be lost.	<p>The agricultural land will not be lost. The great majority of the land resource will not be permanently affected as an agricultural resource by the installation of panels as part of the Proposed Development. An assessment of the areas affected by tracks, solar stations and the substation is set out in the ES Chapter 12 at Table 12-6 <b>[APP-114]</b>. The area extends to 14.4ha, of which 0.5ha is Grade 2 and 3.7ha is sub-grade 3a land within the Best and Most Versatile agricultural land definition.</p> <p>Consideration of the food production and economic implications of the use of the BMV land for the Proposed Development compared to the production from poorer quality land are set out in the ES at</p>

			<p>sections 12.4.83 and Table 12-11 <b>[APP-114]</b>. In short, the Applicant does not consider that the Proposed Scheme affects the UK's food security (noting in any event that this is not a matter protected in policy terms).</p> <p>The incremental reduction of crop production from the BMV land compared to non-BMV land is of the order of 250 tonnes (ES 12.4.84) from an annual production of 21million tonnes (ES 12.4.76).</p> <p>There are no policies or obligations to farm agricultural land in any particular farming manner or to any particular crop or stocking, see the ES Chapter 12 at 12.4.67 and 68.</p> <p>Agricultural use in the form of livestock grazing will continue under and around the panels, and on retained agricultural land.</p>
Project design, location and size	Design	A huge swathe of attractive countryside 4 miles in length will be blighted by an industrial development.	<p>There is an urgent need for renewable energy projects to deliver the Government's legally binding commitment to net zero, which cannot be reached with the delivery of small sites alone – projects are needed to deliver energy at scale, as discussed in section 8.5 <b>Statement of Need [APP-202]</b>, which concludes that the development of large sites (which connect to the transmission network) is essential in order to connect the scale of new capacity required to meet Net Zero requirements. On this basis, the emphasis should be on maximising the use of available capacity at grid connections where they occur. Consideration was therefore given to areas in</p>

			<p>the UK where grid connections were available and that were suitable for solar development</p> <p><b>Section 8 of the Planning Statement [APP-203]</b> concludes with a consideration of the Planning Balance and justifies how the overwhelming national need, as demonstrated in the <b>Statement of Need [APP-202]</b> outweighs any potential significant adverse impacts which, as the <b>Environmental Statement [APP-047]</b> sets out, are limited.</p> <p>The character and appearance of the Order limits would change from arable farmland to a utility-scale solar PV development. However, due to landform and the framework of woodlands, treebelts and hedgerows proposed, the Solar PV Site would appear subdivided and compartmentalised.</p> <p>The mass, scale and form of the Solar PV Site and Onsite Substation would not be viewed as a continuous block of development as the ‘modular’ characteristics of solar development allow it to sit within the existing landscape fabric ed . These factors would assist to reduce the overall perceived scale of the development.</p>
Design and Access; Highways and Transport	Public Rights of Way (PRoW)	This area with its narrow lanes, paths and bridle paths provides recreation for many walkers, horse riders, and increasingly cyclists.	Construction vehicles will only use the permitted routes to access the Order Limits. This will be secured by way of requirement in the DCO through the final CTMP. Breaching the requirements of the DCO is a criminal offence. These routes are described in detail within the oCTMP <b>[APP-212]</b>



			<p>The one-way routing and use of a consolidation strategy reduces the likelihood of any two-way conflicts between construction vehicles.</p> <p>Passing places will be introduced along Uffington Lane to help facilitate two-way flows for the construction phase, as well as minor widening works to the A6121 / Uffington Lane priority junction. More details are provided within Appendix 9.4 of ES Chapter 9 <b>[APP-074]</b></p> <p>Assessments were undertaken in the ES Chapter 9 <b>[APP-076]</b> which concluded the effects of the construction phase on non-motorised users would be negligible.</p> <p>A Recreational and Amenity assessment was undertaken and is presented in the ES Chapter 6 Appendix 6.5 <b>[APP-058]</b> which concluded that whilst impacts to PRoW within the site during construction would be significant, operation impacts would not be significant following mitigation post 15 years when mitigation planting has matured. In relation to the two PRoWs within the Solar PV Site where this is not the case (Bridleways E169 and E182) offsets of at least 15m are proposed along with new planting so that overtime the impact on the recreational amenity of these routes will reduce (although still acknowledged to be significant in LVIA terms). In addition, the Proposed Development will provide additional routes for recreational use in the form of 8.1km of new permissive paths. Further details on the permissive paths are</p>
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			outlined within outline Landscape and Ecological Management Plan <b>[APP-210]</b> .
Ecology and Biodiversity	Effects on wildlife	The effects on wildlife of a development this size are unknown. Wildlife Trusts claim that the loss of biodiversity claimed by HS2 is grossly inaccurate and the loss is much greater.	The Environmental Statement has been undertaken in line with industry best practice and concludes that no likely significant effects to ecology and biodiversity to arise from the Proposed Development.
Construction impacts	Construction traffic	It will take between 2 and 3 years to build. This huge construction site will affect the lives of 30,000 people who live in Stamford and the surrounding villages with extra traffic on roads that are unsuitable.	<p>The construction traffic impact assessment is set out in ES Chapter 9 Highways and Access <b>[APP-039]</b> The assessment identified that the Proposed Development will result in a negligible increase in traffic on the majority of the local network, with less than a 2% increase in the daily vehicle flows. Where there is a greater impact on Uffington Lane, mitigation is proposed in the form of passing places and widening at the junction with the A6121.</p> <p>Construction vehicles will only use the permitted routes to access the Order Limits. This will be secured by way of requirement in the DCO through the final CTMP. Breaching the requirements of the DCO is a criminal offence. These routes are described in detail within the oCTMP.</p> <p>The one-way routing and use of a consolidation strategy reduces the likelihood of any two-way conflicts between construction vehicles, alongside a series of other mitigation measures detailed within the oCTMP.</p>

Statement of Need	Alternative technical	Solar Panels are the least efficient of all forms of green energy.	<p><b>Section 3.3</b> of the <b>Statement of Need [APP-202]</b> describes Government’s view that large capacities of low-carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that “a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar”.</p> <p>The cost of solar generation is an important enabler of its development. Solar panels and electrical infrastructure have become larger and more efficient. <b>Figure 10.2</b> of the <b>Statement of Need</b> shows that many solar cell cells are over 20% efficient and some are within reach of 30% efficiency, meaning that more low-carbon electricity can be generated from the same area of land as was previously possible.</p> <p><b>Table 7.1</b> of the <b>Statement of Need</b> shows the electricity generated per Ha by different low-carbon technologies. At the UK’s average solar load factor (11%), solar generation produces much more energy per Ha than biogas, and generates a similar amount of energy as onshore wind.</p> <p>Solar is now a leading low-cost generation technology and <b>Figure 10.4</b> of the <b>Statement of Need</b> shows that on a levelized cost of energy basis, large scale solar is already cheaper than offshore wind, and Government’s projections are that it will</p>

			<p>remain cheaper in the future. In 2021, GB sourced 42% of its electricity from renewables, of which approximately 9.4% was from solar.</p>
<p>Design and access; Landscape and visual</p>	<p>Green infrastructure strategy</p>	<p>The completed site with its high fences, security lighting and low-level sound will truly be a 'blot on the landscape of 'our green and pleasant land'. We must stop taking easy options and stop despoiling our countryside for the sake of our children and grandchildren.</p>	<p>The Design and Access Statement <b>[APP-204]</b> sets out how the design of the Proposed Development has responded to its specific context, taken account of sensitive receptors and sought to assimilate the Proposed Development sensitively into the environment. Specific guidelines are set out within the DAS in relation to the design of fencing, security lighting and the location of solar stations away from PRow and residential dwellings (at least 250m away).</p> <p>This manifests spatially in the Green Infrastructure Strategy Plan <b>[APP-173]</b> which not only sets out mitigation to reduce potential impacts but also opportunities for environmental enhancement.</p>

**Great Casterton Parish Council (RR-0381)**

Topic	Theme	Statutory Consultee Comment	MPSF Response
Highways and Access	Construction traffic impacts	We will be greatly affected by construction traffic passing through the village from the A1 to the site, Great Casterton has a narrow Main Street with listed houses and already a traffic problem due to the present of two schools in the village. Trucks enroute to the site will make this even more difficult as well as being a hazard to school children.	<p>The delivery hours of HGVs to the primary compound will be restricted to avoid morning and evening peak hours, as well as avoiding School drop-off and pick up hours – meaning on weekdays HGV deliveries to the primary compound will only take place between 09:00-15:00. This will be secured by way of requirement in the DCO through the final CTMP.</p> <p>Breaching the requirements of the DCO is a criminal offence. Further detail is provided within the oCTMP [APP-212]</p>

**Toft Cum Lound and Manthorpe Parish Council (RR-1174)**

Topic	Theme	Statutory Consultee Comment	MPSF Response
Project	Size and location	<p>As a general comment, we are not averse to promoting low carbon and efficient forms of generating electricity but the size and proposed location of the project appears to be based upon lowest delivery cost/profit maximisation criteria rather than considerations of the wellbeing of neighbouring residents and the potential long-term impact on the surrounding area.</p>	<p>There is an urgent need for renewable energy projects to deliver the Government’s legally binding commitment to net zero, which cannot be reached with the delivery of small sites alone – projects are needed to deliver energy at scale, as discussed in the section 8.5 <b>Statement of Need [APP-202]</b>, which concludes that the development of large sites (which connect to the transmission network) is essential in order to connect the scale of new capacity required to meet Net Zero requirements. On this basis, the emphasis should be on maximising the use of available capacity at grid connections where they occur. Consideration was therefore given to areas in the UK where grid connections were available and that were suitable for solar development.</p> <p><b>Paragraphs 3.3.17-18 of the Statement of Need [APP-202]</b> explains Government’s view that irradiance, site topography and proximity to suitable connection points to the transmission network, are likely to be key inputs to site selection. <b>Section 7.5 of the Statement of Need</b> describes the site selection process for large-scale solar more fully, and <b>Section 7.7 of the Statement of Need</b> sets out how the design of the Proposed Development seeks to maximise utilisation of the grid connection capacity available at Ryhall Substation.</p> <p>The Site Selection Assessment <b>[APP-203]</b> describes how the site of the Proposed Development was chosen, taking account of impacts to dwellings, and</p>

			the Design and Access Statement [APP-204] describes how the design of the Proposed Development has accounted for its local context following the site being chosen.
Ecology and Biodiversity	Effects on wider environment	Solar energy is touted to be one of the greenest, cleanest sources of electricity, but solar farms as proposed tend to have a deep environmental impact.	<p><b>Section 3.3</b> of the <b>Statement of Need</b> describes Government’s view that large capacities of low-carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that “a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar”.</p> <p><b>Section 8.5</b> of the <b>Statement of Need [APP-202]</b> describes the Applicant’s view (and this aligns with Government’s view) that large-scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p> <p><b>Section 8</b> of the <b>Planning Statement [APP-203]</b> concludes with a consideration of the Planning Balance and justifies how the overwhelming national need, as demonstrated in the <b>Statement of Need [APP-202]</b> outweighs any potential significant adverse impacts which, as the <b>Environmental Statement [APP-047]</b> sets out, are limited.</p>
Environmental Impacts	General	The impacts include habitat loss, alteration in land use, the strain on water resources, exposure to hazardous materials, and pollution of soil, air, and water resources.	The Environmental Statement has considered all of these aspects and concluded that no likely significant effects are expected to arise from the Proposed Development in these topics.

Project location and size	Location	We are aware of a general proposition that the solution to avoiding such impacts on the local residents is to choose locations of low-value and wastelands such as brownfield sites, disused or unusable mines, and along transportation and transmission corridors.	<p><b>Section 3.3</b> of the <b>Statement of Need [APP-202]</b> describes Government’s view that large capacities of low-carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that “a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar”.</p> <p><b>Section 7.6</b> of the <b>Statement of Need [APP-202]</b> analyses the potential contribution of “brownfield” solar sites to the national need for solar generation. Brownfield sites, including rooftop and other community energy systems, are likely to grow in the UK and will make a contribution to decarbonisation of the UK energy system. However, the <b>Statement of Need</b> concludes that on their own, brownfield developments are unlikely to be able to meet the national need for solar. <b>Section 8.5</b> of the <b>Statement of Need</b> describes and agrees with Government’s view that decentralised and community energy systems are unlikely to lead to the significant replacement of large-scale infrastructure. It is the Applicant’s view (and this aligns with Government’s view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p>
Project Location	Traffic impact	In this scenario selecting a route along transportation corridors does not include those corridors where they pass through or adjacent to residential areas - as is the situation here. We believe the intention is to choose corridors with little or no adjacent conurbations – the opposite to what is currently proposed.	The Site Selection Assessment [APP-203] explains the site selection process undertaken by the Applicant, which takes as its starting point, the considerations in the NPS.



Project location and size	Carbon and Loss of agricultural land	<p>Solar energy still has a long way to go before it is affordable, efficient, and environmentally friendly. Although solar energy is considered to be free of greenhouse gas emissions the lifecycle emissions of PV cells during the manufacturing, transportation, installation, maintenance, and dismantlement are too significant to ignore. The land take proposed is massive and, unlike with wind power, sharing the land for agriculture uses is not an option.</p>	<p>Solar is a low-carbon electricity generation technology. <b>Figure 7.3</b> of the <b>Statement of Need [APP-202]</b> shows the cumulative carbon emissions saved by solar generation versus the case that the electricity generated by solar was instead generated by Combined Cycle Gas Turbines (which emit carbon at a rate of 394 gCO<sub>2</sub>/kWh). The IPCC estimate of lifetime emissions of 48 kgCO<sub>2</sub>eq/MWh for utility scale solar generation (based on the median value from a range of 8 to 180 kgCO<sub>2</sub>e/MWh) includes embedded emissions in materials and the construction phase, and has been taken into account in the Applicant’s assessment.</p> <p><b>Section 3.3</b> of the <b>Statement of Need [APP-202]</b> describes Government’s view that large capacities of low-carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that “a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar”.</p> <p><b>Figure 10.4</b> of the <b>Statement of Need</b> shows that on a levelized cost of energy basis, large scale solar is already cheaper than offshore wind, and Government’s projections are that it will remain cheaper in the future.</p> <p>The Solar PV part of the Proposed Development will be able to be shared with grazing agricultural uses.</p>
Land use and Soil	Loss of productive land	The project requires clearing vast tracts of land, which will affect existing land uses which include agriculture	The great majority of the land will not be permanently affected as agricultural resources post

		<p>and grazing – both of which are important aspects of our local area.</p>	<p>decommissioning, by the installation of panels as part of the Proposed Development. An assessment of the areas affected by tracks, solar stations and the substation is set out in the ES Chapter 12 at Table 12-6 <b>[APP-114]</b>. The area extends to 0.5ha of Grade 2 and 3.7ha of sub-grade 3a land within the Best and Most Versatile agricultural land definition.</p> <p>The calculation of the area affected by the substation includes a larger area than the footprint, and the actual area involved is smaller, ES 12.4.45 <b>[APP-114]</b>.</p> <p>The areas affected by tracks and solar station areas are capable of being restored to comparable agricultural use and quality at decommissioning but again a precautionary approach has been taken in the assessment and these areas have been included as potentially lost to agricultural use, ES paragraph 12.4.16 to 18 <b>[APP-114]</b>.</p> <p>Consideration of the food production and economic implications of the use of the BMV land for the Proposed Development compared to the production from poorer quality land are set out in the ES at sections 12.4.83 and Table 12-11 <b>[APP-114]</b>.</p>
Ecology and Biodiversity	Loss of Habitats and impact on wildlife	<p>Additionally, habitat destruction for the wildlife will result in a large-scale displacement of wild species. The impact on one wildlife species can destroy the entire ecosystem since one species is dependent on another. When one is removed, the entire ecosystem of that species, comprised of plants, animals and birds</p>	<p>The habitat losses will largely be limited to arable land, which supports a very limited amount of wildlife. Chapter 7: Ecology and Biodiversity, of the ES , presents the approach and findings of the assessment of potential impacts on Ecology and</p>

		can starve to death. The reason is that the habitat becomes less liveable for the species that are dependent on each other for survival.	Biodiversity. This has concluded that there will not be any significant impacts to any ecological feature.
Construction impacts	Construction traffic	The construction activities of a large-scale solar power plant in our area at the time of installation could increase the particulate matter in the air, leading to contamination of air and water resources. The release of pathogens present in the soil can increase the risk of air pollution. A further consideration during this stage is that the highways infrastructure in the area is not designed to carry the likely level and size of vehicles that would be associated with the construction and ongoing maintenance of such a project.	<p>The Applicant has assessed the potential effects of the construction phase of the Proposed Development on Air Quality in the Environmental Statement (Chapter 15: Other Environmental Topics <b>[APP-045]</b>).</p> <p>Construction activities will be controlled by the oCEMP <b>[APP-207]</b> which includes appropriate mitigation measures to minimise dust and non-road mobile machinery (NRMM) emissions during the construction phase.</p> <p>The oCEMP sets out the requirement for a Dust Management Plan (DMP) to be prepared as part of the detailed CEMP, prior to the construction of the Proposed Development, which would contain dust emission control measures to be applied during construction. These measures include, but are not limited to:</p> <ul style="list-style-type: none"> <li>- Site Management, such as logging and investigating dust complaints to resolve them quickly;</li> <li>- Monitoring, such as site inspections on and off site to make sure there are no signs of dust emission;</li> <li>- Design of the construction activities of the Proposed Development to locate dust-causing activities away from receptors;</li> <li>- Management practices such as wheel washing, damping down access routes, and using water assisted dust sweepers.</li> </ul>

			<p>With this mitigation in place, the Environmental Statement's Air Quality assessment concludes at 15.2.33 that emissions from dust and NRMM during construction would be negligible. Furthermore, with these mitigation measures in places, no significant effects are predicted to water resources during construction from dust emissions.</p> <p>Construction vehicles will only use the permitted routes to access the Order Limits. This will be secured by way of requirement in the DCO through the final CTMP. Breaching the requirements of the DCO is a criminal offence. These routes are described in detail within the oCTMP <b>[APP-212]</b></p> <p>Condition surveys will be undertaken to determine the state of the existing highway, the scope of which will be agreed with RCC and LCC. The Applicant will repair any damaged highways as a result of construction traffic to a standard set out in the pre-construction surveys. Enabling works will also be provided at the access points across the Order limits to upgrade the existing access points to an appropriate standard.</p>
Land use and soils	Contamination of land	We are also concerned that there is the potential for the solar panels to be damaged by storms. On top of the cost of replacing the solar panels, the damaged ones have to be handled and disposed of properly due to the toxic compounds used inside. Any mishandling would lead to high levels of pollution. How do you	The outline Operational Environmental Management Plan <b>[APP-208]</b> sets out the measures of how waste arising from the proposed development during the operational phase will be managed.

		intend meeting this challenge safely with no impact on our communities?	
Local communities	Lack of direct benefits	A solar farm of the size proposed will blight our rural area on a scale not seen before in the UK. It will be our local communities who bear the brunt and impact of the project without any direct benefit.	<p>The Applicant sought to include benefits to the local community from the inception of the Project and has taken a design-led approach to the overall masterplan, including substantial Green Infrastructure commitments from an early date, including opening up of pedestrian walkways along a new river corridor on the West Glen River. This approach is set out in the Design and Access Statement [APP-204]. This approach to ensuring good design in infrastructure developments is also a policy requirement in NPS EN1 (section 4.5).</p> <p>The Proposed Development will be sensitively sited and offset from residential properties through 50m offsets for solar stations from PRowS and 250m offset of solar stations from residential properties All existing PRowS will be retained in their existing alignment and complemented by a total of 8.1km of new permissive paths that link to wider network and creating joined up routes. There will be a 15m offset from PRowS to the edge of the Solar PV Site with appropriate screening planting to manage the amenity of PRowS. The Proposed Development will create opportunities for people to engage with the natural world in the form of nature areas, viewing hides and interpretation boards.</p> <p>Whilst not a direct local benefit, there is benefit to all UK citizens from the UK producing more clean, renewable electricity, in terms of affordability and</p>

			energy security and resilience. This is considered further in the Statement of Need [APP-202].
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**Greatford Parish Council (RR-XX)**

Topic	Theme	Statutory Consultee Comment	MPSF Response
Environmental	Flood Risk	<p>Greatford Parish Council object to the development of Mallard Pass Solar Farm for the following reasons: We are very concerned about the potential that this development could have upon the speed and severity of flooding immediately downstream of the site, specifically in the village of Greatford.</p>	<p>The Applicant has undertaken a Flood Risk Assessment which can be found within Appendix 11.5 of the Environmental Statement [APP-086]. In Section 3, the assessment states that the implementation of measures set out in the Outline Surface Water Drainage Strategy (Appendix 11.6 of the ES [APP-087] will prevent an increase in flood risk elsewhere in the local area.</p> <p>The Outline Surface Water Drainage Strategy [APP-087] describes how surface water run-off from all aspects of the Proposed Development will be managed through planting denser vegetation which will increase the interception potential of surface water within the Solar PV area.</p> <p>Section 2 of the Outline Surface Water Drainage Strategy [APP-087] outlines the SuDS measures which will be implemented at the Onsite Substation to attenuate surface water runoff rates and concludes that the introduction of hard-standing associated with the Proposed Development will not lead to an increase in discharge rates above greenfield levels for a 1 in 100-year return period. As such, there will not be an increase in flows to the West Glen River and subsequently no increase in runoff rates affecting downstream receptors, including Greatford.</p>

<p>Land Use and Soils</p>	<p>Flood Risk Impact</p>	<p>In periods of heavy rain the water running off of the large areas of solar panels and other hard surfaces of the proposed solar farm will be concentrated onto a much smaller area of the soil surface than is currently the case.</p>	<p>The potential effects of the Proposed Development relating to water resources and ground conditions have been assessed in Chapter 11 of the Environmental Statement <b>[APP-041]</b>. This considers the potential for surface water runoff and flood risk and states at 11.4.77 that the effect of surface water runoff on receiving watercourses is negligible. Section 3 of Appendix 11.6: Outline Surface Water Drainage Strategy <b>[APP-087]</b> describes how surface water run-off from the PV arrays will be managed to limit run-off rates.</p> <p>Installation of the PV arrays does not involve the introduction of hard-standing at ground level meaning the superficial cover for the majority of the Order Limits will remain the same as the baseline. Additionally, the PV array tables will have regular rainwater gaps to prevent water being concentrated along a single drip line.</p> <p>Section 2 of the Outline Surface Water Drainage Strategy <b>[APP-087]</b> outlines the SuDS measures which will be implemented at the onsite substation to attenuate surface water runoff rates and concludes that the introduction of hard-standing associated with the Proposed Development will not lead to an increase in discharge rates above greenfield levels for a 1 in 100-year return period.</p>
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Land Use and Soils	Flood Risk Impact	<p>The clay soils of the site have inherently poor water infiltration rates, and this, combined with likely compaction from the construction process will lead to over land flows of water making its way into drains, ditches and ultimately the West Glen River much more quickly than is currently the case which will cause quicker and more severe flood events than we currently experience.</p>	<p>The superficial geology cover within the Order Limits is described as Alluvium – (clay, silt, sand and gravel), River Terrace deposits (sand and gravel) and glaciofluvial deposits (sand and gravel) in paragraphs 11.2.11 to 11.2.16 of Chapter 11 of the Environmental Statement <b>[APP-041]</b> and displayed in Figure 11.3.</p> <p>As also outlined in Section 3.1 of the Outline Surface Water Drainage Strategy <b>[APP-087]</b>, the baseline superficial geology cover is predominately clay soils overlain by a mix of superficial soils which are tilled or left as stubble for large parts of the year and which is likely to limit infiltration and promote surface water runoff leading to concentrations of surface water entering the surrounding hydrogeological network. The proposed grass and vegetation cover during the operational period of the Proposed Development set out in the Strategy is likely to generate lesser surface water runoff rates.</p> <p>Paragraphs 11.4.55 to 11.4.60 of Chapter 11 of the Environmental Statement <b>[APP-041]</b> state that the superficial geology underlying the Proposed Development is generally of low permeability and is in agricultural use, so the effects of compaction from the construction phase would not result in a substantial increase in runoff compared to existing conditions. The ES assessment found the potential effects of compaction of soils during construction to be negligible.</p>
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			<p>Table 1-1 Summary of Mitigation Measures within the Outline Water Management Plan <b>[APP-214]</b> details that measures to prevent compaction of soil during construction, such as avoiding tracking over soils when too wet, are detailed in and secured by the outline Soil Management Plan (oSMP) <b>[APP-213]</b>.</p>
<p>Environmental Impact</p>	<p>Flood Risk</p>	<p>Greatford is already prone to flooding even with the Greatford Cut flood relief channel, the Environmental Impact Assessment has not considered downstream flooding from the proposed site and we wish to formally raise this issue with the Planning Inspectorate.</p>	<p>The potential effects of the Proposed Development on water resources and ground conditions have been assessed in Chapter 11 of the Environmental Statement <b>[APP-041]</b>. Paragraphs 11.4.67 to 11.4.77 of this assessment state that the impact of surface water runoff and floods on the receiving watercourses as a result of the Proposed Development are considered to have a negligible significance of effect i.e. will not have an effect on downstream receptors.</p> <p>An assessment of Flood Risk, including the management of surface water run-off rates, has also been undertaken and can be found within Appendix 11.5 of the ES <b>[APP-086]</b>. Calculations of surface water run-off rates pre and post-development are outlined in Appendix 11.6: Outline Surface Water Drainage Strategy of the ES <b>[APP-087]</b>, specifically Section 3 addresses run-off from the PV arrays. The Flood Risk Assessment states in Section 3 that the implementation of measures in the Outline Surface Water Strategy will prevent an increase in flood risk elsewhere in the area.</p>

Land use and Soil	Loss of productive land	<p>We also wish to further object to the proposal for the following reasons:- The loss of a large area of productive grade 3a Best and Most Versatile (BMV) arable farmland. The scale of this industrial infrastructure proposal which is completely out of character in the rolling rural landscape adjacent to our village.</p>	<p>The great majority of the agricultural land will not be permanently affected by the installation of panels as part of the Proposed Development. An assessment of the areas affected by tracks, solar stations and the substation is set out in the ES Chapter 12 at Table 12-6 <b>[APP-114]</b>. The area extends to 14.4ha of which 0.5ha is Grade 2 and 3.7ha is sub-grade 3a land within the Best and Most Versatile agricultural land definition.</p> <p>The potential impacts to the landscape and visual resource, has been comprehensively assessed in accordance with best practice guidance and informed by consultation with stakeholders. The results of this assessment are set out in detail within the LVIA <b>[APP-036]</b> with limited localised adverse significant effects identified.</p> <p>The Design and Access Statement <b>[APP-204]</b> sets out how the design of the proposed development has responded to its context, including the design principles which have informed the design.</p> <p>The Green Infrastructure Strategy Plan <b>[APP-173]</b>, Figure 6.11 of the LVIA , the Outline Landscape and Ecology Management Plan <b>[APP-210]</b> and the Work Plans <b>[APP-006]</b> illustrate the areas near to settlements proposed as Mitigation and Enhancement Areas and detail how the retained and new planting proposed will be managed.</p>

<p>Ecology and Biodiversity</p>	<p>Loss of habitats</p>	<p>The loss of habitat for large mammals such as deer &amp; hare and other wildlife which require open, unenclosed areas to survive.</p> <p>The loss of amenity for people as previously pleasant footpaths with open views will be enclosed by fences and the views destroyed.</p>	<p>The Design and Access Statement <b>[APP-204]</b> sets out how the design of the Proposed Ddevelopment has responded to its context, including the Design Guidance applied to PRow and fencing.</p> <p>The retention and enhancement of existing Green Infrastructure corridors is a project principle and facilitating movement of wildlife through the use of mammal gates within perimeter fencing is set out within the Design Guidance and the Outline Landscape and Ecology Management Plan <b>[APP-210]</b>. No likely significant effects to ecological features are identified in the Environmental Statement</p>
<p>Landscape and Visual Impacts</p>	<p>Impact on views</p>	<p>There will be significant visual impact for those overlooking the site as it will be visible from considerable distances and cannot be screened from long distance viewpoints.</p>	<p>The potential impacts to the landscape and visual resource has been comprehensively assessed in accordance with best practice guidance and informed by consultation with stakeholders. The results of this assessment are set out in detail within the LVIA <b>[APP-036]</b> and concludes that there are limited localised residual significant effects.</p> <p>Furthermore, a Residential Visual Amenity Assessment (RVAA) has been undertaken to consider the potential impacts to dwellings in close proximity to the Order Limits <b>[APP-057]</b> which concludes that the Residential Visual Amenity Threshold is not breached for any dwelling .</p> <p>The Design and Access Statement <b>[APP-204]</b> sets out how the design of the Proposed Development has</p>

			<p>responded to its context, including the Design Principles which have informed the design.</p> <p>The Green Infrastructure Strategy Plan <b>[APP-173]</b>, Figure 6.11 of the LVIA, the Outline Landscape and Ecology Management Plan <b>[APP-210]</b> and the Work Plans <b>[APP-006]</b> illustrate the areas near to settlements proposed as Mitigation and Enhancement Areas and detail how the retained and new planting proposed will be managed.</p>
Traffic and Transport	Impact of traffic	<p>We are concerned about the increase in traffic through the area and specifically Greatford village. The village already has problems with HGV and other traffic using its rural B roads as a 'rat run' to avoid choke points on the surrounding main A roads. Quarries and other businesses in the area have routing agreements which are not adhered to, and we fear that this would be the case with Mallard Pass traffic also.</p>	<p>Construction vehicles will only use the permitted routes to access the Order Limits. The routes to the primary construction compound are Routes 1 and 3 as shown on Figure 3-1 in the oCTMP <b>[APP-212]</b>. These routes have been selected as they form the most direct, suitable means of access to the Order Limits from the SRN, that are considered to be appropriate to accommodate HGV traffic given there is already an existing level of HGV traffic identified on these roads. Use of these roads exclusively will limit the impact on the wider road network, ensuring that only the roads identified as being suitable are used and in turn reducing any potential adverse effects. This will be secured by way of requirement in the DCO through the final CTMP. Breaching the requirements of the DCO is a criminal offence.</p> <p>The construction vehicles will be easily identifiable for any complaints by the public, with details of the individual responsible for dealing with complaints and issues provided within the final CTMP. More</p>

			details can be found in Section 5 of oCTMP [APP-212].
Supply Chain	Sourcing of Materials	Members of the Council and Parishioners have also raised concerns about the developers sourcing strategy for the materials required for this infrastructure project, in particular the sourcing of materials from companies that have been associated with Uighur labour camps in Xinjiang, China. The indeterminate timeframe for the proposal.	<p>The Applicant recognises that communities and stakeholders want clear commitments that the technology used for the Proposed Development will be free from forced labour; this is why the Applicant has produced a clear Outline Employment, Skills and Supply Chain Plan (OESSCEP) - that includes clear commitments on ethical procurement. As detailed in the OESSCEP, [APP-211], the Applicant wishes to ensure the construction, operation, and decommissioning of the Proposed Development is undertaken pursuant to an ethical procurement policy and that this is a legal obligation on anyone who has the powers under the DCO. The OESSCEP is a certified document in the draft DCO [APP-017].</p> <p>The Applicant strongly condemns and opposes the use of forced labour in any context in the strongest possible terms. The Applicant fully supports the steps being taken by the UK government and solar industry to ensure the highest possible levels of transparency and to rid human rights abuses from the global supply chain for UK solar developments. In addition to this, the Applicant has published clear statements on this topic, which condemn the illegal practice of modern slavery or forced labour of any kind.</p> <p>These statements can be found using the following URLs:</p> <ul style="list-style-type: none"> <li>• Canadian Solar:  <div style="background-color: black; width: 200px; height: 15px; margin: 2px 0;"></div> <div style="background-color: black; width: 200px; height: 15px; margin: 2px 0;"></div> </li> </ul>

			<p>[REDACTED]</p> <ul style="list-style-type: none"> <li>• Windel Energy: [REDACTED] [REDACTED] [REDACTED]</li> </ul> <p>The Applicant has signed the Solar Energy UK Industry Supply Chain Statement, a UK-based industry-wide condemnation of all human rights abuses, including forced labour in the global supply chain. The UK Industry Supply Chain Statement can be found using the follow URL: [REDACTED] [REDACTED]</p>
Local communities	Lack of direct benefits	This proposal is a huge imposition upon the locality and its residents, Mallard Pass have offered nothing significant in terms of community benefit to compensate for the loss or transformation of footpaths and open views, for the huge amount of upheaval the community will endure during the construction of the site, or to alleviate flooding downstream of the site.	<p>The Applicant sought to include benefits to the local community from the inception of the Project and has taken a design-led approach to the overall masterplan, including substantial Green Infrastructure commitments from an early date, including opening up of pedestrian walkways along a new river corridor on the West Glen River. This approach is set out in the Design and Access Statement [APP-204]. This approach to ensuring good design in infrastructure developments is also a policy requirement in NPS EN1 (section 4.5).</p> <p>The Proposed Development will be sensitively sited and offset from residential properties through 50m offsets for solar stations from PRoWs and 250m offset of solar stations from residential properties All existing PRoWs will be retained in their existing</p>

			<p>alignment and complemented by a total of 8.1km of new permissive paths that link to wider network and creating joined up routes. There will be a 15m offset from PRowS to the edge of the Solar PV Site with appropriate screening planting to manage the amenity of PRowS. The Proposed Development will create opportunities for people to engage with the natural world in the form of nature areas, viewing hides and interpretation boards.</p> <p>Whilst not a direct local benefit, there is benefit to all UK citizens from the UK producing more clean, renewable electricity, in terms of affordability and energy security and resilience. This is considered further in the Statement of Need [APP-202].</p> <p>The Proposed Development will not result in increased flood risk elsewhere. This is confirmed in the Flood Risk Assessment (Section 3) submitted with the Application [APP-086].</p>
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**Braceborough and Wilsthorpe Parish Council (RR-0115)**

Topic	Theme	Statutory Consultee Comment	MPSF Response
Construction	Construction issues	<ul style="list-style-type: none"> <li>• 2 years of noise, light pollution, disruption and damage across the 2,105 acre site and surrounding area.</li> <li>• *Cabling to new sub-station may now run through Essendine with Mallard Pass seeking compulsory acquisition 'rights'.</li> <li>• Extensive traffic measures through Ryhall, Essendine, Great Casterton and surrounding areas especially in the vicinity of 7 construction compounds.</li> <li>• 80, 400 and 1000 tonne HGV loads.</li> <li>• Up to 400 workers a day on-site; working hours 7am-7pm Mon to Sat.</li> <li>• Public rights or way (PRoW) will be closed and/or diverted when required.</li> <li>• Complete uncertainty for future generations as the application has no time limit.</li> <li>• Will the funding be secure for decommissioning, if not there could be a solar graveyard when it shuts down?</li> </ul> <p><i>Note: *The draft DCO (Development Consent Order) outlines the compulsory acquisition 'rights', whether permanent or temporary.</i></p>	<p>The Environmental Statement has assessed the construction impacts of the Scheme relating to all of these factors, and concludes that, with the mitigation measures set out in the oCEMP [APP-207] and the o CTMP [APP-212], no significant effects are expected to arise.</p> <p>Decommissioning is controlled through Requirement 18 of the DCO, which requires a Decommissioning Environmental Management Plan to be put in place. Compliance with that plan is secured through the DCO.</p>
Proposed Development	PRoW	<p>Peoples' property/boundary will be affected in some way. Existing rights may either be extinguished or suspended for the duration of the solar farm, or during construction. Causing major uncertainty and mental stress to those households.</p>	<p>The Applicant does not propose to compulsory acquire any garden land. Whilst the Land Plans [APP-005] appear to show land take within properties, this is not the case. As explained in Note 2 to the Land Plans, the plot boundaries have been drawn to the Land Registry boundaries, or where it is available and differs from those boundaries, topographical survey data. The accuracy of these information</p>

			<p>sources differs from OS Base Mapping, which results in the plot boundaries and/or the Order limits not aligning with the line work shown on the OS Base Mapping.</p> <p>+</p> <p>The description of the plots in the Book of Reference [APP-023] make clear that no properties are proposed to be subject to the land powers in the DCO.</p> <p>Some residents are identified as holding an interest in highway land. Their interests are listed as the title to the highway land land is unregistered, and as a highway, it is therefore <i>presumed</i> (which is a rebuttable presumption) that those residents hold an interest in the land underneath the highway under the ‘ad medium filum’ rule. It is this subsoil which is sought to be subject to the compulsory acquisition of rights for the cable corridor.</p>
Operational	Operational issues:	<ul style="list-style-type: none"> <li>• Site 2,105 acres (c1,300 football pitches), solar area 1,052 acres (1,312 acres including field margins). The sheer unprecedented scale and topography means you cannot eradicate or screen all the adverse impacts.</li> <li>• No benefits directly for the community, the energy produced will be used across the UK as required. Local electricity tariff will not be cheaper as a result.</li> <li>• The local landscape will be changed to an industrial-landscape with 530,000 solar panels 3.3m high; security fencing and CCTV; solar stations or shipping containers housing inverters/transformers dotted across the solar area.</li> </ul>	<p>The Environmental Statement has assessed the effects the construction, operational and decommissioning impacts of the Proposed Development for the following environmental topics:</p> <ul style="list-style-type: none"> <li>• Landscape and Visual [APP-036]</li> <li>• Ecology and Biodiversity [APP-037]</li> <li>• Cultural Heritage [APP-038]</li> <li>• Highways and Access [APP-039]</li> <li>• Noise and Vibration [APP-040]</li> <li>• Water Resources and Ground Conditions [APP-041]</li> <li>• Land Use and Soils [APP-042]</li> </ul>

		<ul style="list-style-type: none"> <li>• New sub-station will be visible &amp; audible for Essendine residents on A6121.</li> <li>• Solar is hugely inefficient as a source of energy, only delivering 11% of its stated capacity on average in the UK.</li> <li>• Loss of productive quality agricultural land at a time we need to protect our food production; solar should be on rooftops or brownfield sites. Mallard Pass's reduced estimate* of BMV (Best and Most Versatile) land is 41%, land that should not be developed on according to planning policy. (Note: *needs validating, previously quoted 53%).</li> <li>• Flood risk concerns discounted by Mallard Pass.</li> <li>• Impact on mental health of residents/locals not considered. Visual amenity of public rights of way (PRoWs) will be significantly compromised, despite addition of permissive paths.</li> <li>• There will be a massive detrimental impact on the bio-diversity of the area and wildlife will lose their habitat.</li> </ul>	<ul style="list-style-type: none"> <li>• Climate Change <b>[APP-043]</b></li> <li>• Socio-Economics <b>[APP-044]</b></li> <li>• Other Environmental Topics including Air Quality, Arboriculture, Glint and Glare, Major Accidents and/or Disasters, Utilities and Waste) <b>[APP-045]</b>.</li> </ul> <p>The potential impacts to the landscape and visual resource, has been comprehensively assessed in accordance with best practice guidance and informed by consultation with stakeholders. The results of the landscape assessment conclude that only limited residual significant effects will arise. The agricultural land will not be lost. The great majority of the land will not be permanently affected as an agricultural resource by the installation of panels as part of the Proposed Development and so will be returned to be agricultural use following decommissioning as set out in the Land Use and Soils assessment.</p> <p>A Flood Risk Assessment has been undertaken and can be found within Appendix 11.5 of the Environmental Statement <b>[APP-086]</b> alongside Appendix 11.6: Outline Surface Water Drainage Strategy of the ES <b>[APP-087]</b> which includes the management of surface water runoff rates for the Proposed Development. Both of these documents include allowances for climate change.</p> <p>The potential effects of the Proposed Development on water resources and ground conditions are assessed in Chapter 11 of the ES <b>[APP-041]</b> and at paragraph 11.4.60 it assessed the effect on the compaction of soil during construction and decommission phases to be negligible. Table 2 of the</p>
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			<p>Flood Risk Assessment <b>[APP-086]</b> concludes that the residual risk of the Proposed Development flooding from all sources is Negligible.</p> <p>The Planning Inspectorate agreed in their EIA Scoping Opinion <b>[APP-050]</b> that human health impacts should be addressed through the relevant technical assessments:</p> <ul style="list-style-type: none"><li>• Highways and Access <b>[APP-039]</b></li><li>• Noise and Vibration <b>[APP-040]</b></li><li>• Other Environmental Topics including Air Quality, Glint and Glare, Major Accidents and/or Disasters and Utilities) <b>[APP-045]</b></li></ul> <p>These assessments conclude that there would be no significant effects on human health.</p> <p>Chapter 7: Ecology and Biodiversity, of the ES <b>[APP-037]</b>, presents the approach and findings of the assessment of potential impacts on Ecology and Biodiversity, which have been carried out in accordance with best practice. The combination of measures identified in the Green Infrastructure Strategy results in the Proposed Development delivering a Biodiversity Net Gain of 72.19% for Habitats and 40.83% for Hedgerows.</p> <p>All existing PRow will be retained in their existing alignment. Whilst temporary closures may be needed during construction, no permanent closures are proposed. In addition, a total of 8.1km of new permissive paths form part of the proposed development, creating new routes to previously non-publicly accessible areas and improving wider PRow network connectivity.</p>
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			<p>The cost of solar generation is an important enabler of its development. Solar panels and electrical infrastructure have become larger and more efficient. <b>Figure 10.2</b> of the <b>Statement of Need</b> shows that many solar cell cells are over 20% efficient and some are within reach of 30% efficiency, meaning that more low-carbon electricity can be generated from the same area of land as was previously possible.</p> <p><b>Table 7.1</b> of the <b>Statement of Need</b> shows the electricity generated per Ha by different low-carbon technologies. At the UK's average solar load factor (11%), solar generation produces much more energy per Ha than biogas, and generates a similar amount of energy as onshore wind.</p> <p>Solar is now a leading low-cost generation technology and <b>Figure 10.4</b> of the <b>Statement of Need</b> shows that on a levelized cost of energy basis, large scale solar is already cheaper than offshore wind, and Government's projections are that it will remain cheaper in the future. In 2021, GB sourced 42% of its electricity from renewables, of which approximately 9.4% was from solar.</p>
Operational	Supply Chain	Of future concern: Windel are open in their application that they will sell out should they achieve planning approval. Solar farms are notorious for schemes constantly being sold on which makes it difficult to control their future development.	Whilst it is understandable that local people may want some security over who will ultimately build out the Mallard Pass Solar Farm, subject to the DCO being allowed, who ultimately develops any scheme is not a consideration for the DCO process, with the

			<p>exception of demonstrating that appropriate funding is in place.</p> <p>The Funding Statement [APP-022] submitted with the application demonstrates that appropriate funding is in place for the DCO, on the basis that it includes compulsory purchase powers, however this does not constrain Windel from selling the Project following grant of DCO if they chose to do so. The Funding Statement states that:</p> <p><i>“Windel is the developer of the Scheme, with Canadian Solar the funder. Once the Scheme reaches ready-to-build stage, Windel will transfer the remainder of its shares to Canadian Solar.”</i></p> <p>What is important from that community perspective is that the controls and mechanisms that are relied upon in the assessment of effects in the Environmental Statement are appropriately secured in the draft DCO. This is set out in the Mitigation Schedule provided at Appendix 17.1 of the ES [APP-015],</p>
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**Essendine Parish Council (RR-0329)**

Topic	Theme	Statutory Consultee Comment	MPSF Response
Proposed Project	Impact on the community	Essendine Parish Council strongly oppose the Solar Farm project. It brings only negative impacts to our community and unacceptable upheaval for the very inefficient production of electricity.	The Applicant understands the strength of feeling within the community, and has designed the scheme to minimise the impacts to the local community, and to provide benefits. However, fundamentally, the Applicant is helping provide a response to urgent need for low carbon energy generation in the UK, as set out in the Statement of Need [APP-202], and the Site Selection Assessment [APP-203] explains why the location of the Proposed Development is an appropriate site for a large scale solar project to form part of meeting that need.
Environment	Impact on local environment	Constructing a Solar Farm (to provide a limited amount of electricity from a system that is expected to be 11% efficient) on three sides of Essendine is swapping a global environmental crisis for a local rural environmental disaster.	<p>Section 3.3 of the Statement of Need describes Government’s view that large capacities of low-carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that “a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar”.</p> <p>Section 8.5 of the Statement of Need [APP-202] describes the Applicant’s view (and this aligns with Government’s view) that large-scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p> <p>Section 8 of the Planning Statement [APP-203] concludes with a consideration of the Planning Balance and justifies how the overwhelming national need, as demonstrated in the Statement of Need [APP-202] outweighs any potential significant</p>

			<p>adverse impacts at a local level which, as the <b>Environmental Statement [APP-047]</b> sets out, are limited.</p> <p>The cost of solar generation is an important enabler of its development. Solar panels and electrical infrastructure have become larger and more efficient. <b>Figure 10.2</b> of the <b>Statement of Need</b> shows that many solar cell cells are over 20% efficient and some are within reach of 30% efficiency, meaning that more low-carbon electricity can be generated from the same area of land as was previously possible.</p> <p><b>Table 7.1</b> of the <b>Statement of Need</b> shows the electricity generated per Ha by different low-carbon technologies. At the UK's average solar load factor (11%), solar generation produces much more energy per Ha than biogas, and generates a similar amount of energy as onshore wind.</p> <p>Solar is now a leading low-cost generation technology and <b>Figure 10.4</b> of the <b>Statement of Need</b> shows that on a levelized cost of energy basis, large scale solar is already cheaper than offshore wind, and Government's projections are that it will remain cheaper in the future. In 2021, GB sourced 42% of its electricity from renewables, of which approximately 9.4% was from solar.</p>
Land Use and Soils	Loss of adequate land and impact on food security.	Loss of Best and Most Valuable Farm Land - currently the Solar Farm site is planned to be sited on 40 plus percent of Best and Most Valuable agricultural land. This land has been farmed for generations	The great majority of the land will not be permanently affected as an agricultural resource by the installation of panels as part of the Proposed Development. An assessment of the areas affected



		<p>contributing to the food chain. Using Best and Most Valuable farm land for Solar Panels is not wise when the UK needs to more mindful of its food security and the ever rising costs of imported food ingredients. In August 2022, Rishi Sunak said “On my watch, we will not lose swathes of our best farmland to solar farms.”</p> <p>Loss of any Farm Land - to a Solar electricity generating plant that is only 11% efficient is not wise when the UK needs to be ever mindful of its food security and the ever rising costs of imported food ingredients.</p>	<p>by tracks, solar stations and the substation is set out in the ES Chapter 12 at Table 12-6 <b>[APP-114]</b>. The area extends to 0.5ha of Grade 2 and 3.7ha of sub-grade 3a land within the Best and Most Versatile agricultural land definition.</p> <p>The calculation of the area affected by the substation includes a larger area than the footprint, and the actual area involved is smaller, ES 12.4.45 <b>[APP-114]</b>.</p> <p>The areas affected by tracks and solar station areas are capable of being restored to comparable agricultural use and quality at decommissioning but again a precautionary approach has been taken in the assessment and these areas have been included as potentially lost to agricultural use, ES paragraph 12.4.16 to 18 <b>[APP-114]</b>.</p> <p>An assessment of the food production and economic implications of the use of the BMV land for the Proposed Development compared to the production from poorer quality land are set out in the ES at sections 12.4.83 and Table 12-11 <b>[APP-114]</b>.</p> <p>The incremental reduction of crop production from the BMV land compared to non-BMV land is of the order of 250 tonnes (ES 12.4.84) from an annual production of 21million tonnes (ES 12.4.76).</p> <p>The economic implications (benefits) for local farms and the increased local farm labour needed for managing the sheep is set out in the ES Chapter 12 at paragraphs 12.4.96 and 12.4.97 <b>[APP114]</b>.</p>
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Proposed Location and scale	Loss of adequate land	<p>People living in rural villages may already not have many amenities (i.e. Essendine has already lost its village shop and pub in recent years). It is unacceptable to lose field surroundings as well. Essendine village - 201 homes - would almost be enclosed by solar panels.</p>	<p><b>Section 3.3</b> of the <b>Statement of Need</b> describes Government’s view that large capacities of low-carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that “a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar”.</p> <p><b>Section 8.5</b> of the <b>Statement of Need [APP-202]</b> describes the Applicant’s view (and this aligns with Government’s view) that large-scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p> <p><b>Section 8</b> of the <b>Planning Statement [APP-203]</b> concludes with a consideration of the Planning Balance and justifies how the overwhelming national need, as demonstrated in the <b>Statement of Need [APP-202]</b> outweighs any potential significant adverse impacts which, as the <b>Environmental Statement [APP-047]</b> sets out, are limited, including in respect of residential amenity and the amenity of resources such as PRowS.</p>
Proposed Location and scale	Loss of adequate land	<p>Principle -The construction of a 2000 plus acre Solar Farm in a rural agricultural area, with woodland and open fields is not in keeping or appropriate to the look and feel of the local rural environment.</p>	<p>The potential landscape and visual effects have been comprehensively assessed in accordance with best practice guidance and informed by stakeholder consultation. The results of this assessment are set out in detail within the LVIA within Chapter 6 of the ES <b>[APP-036]</b>.</p>

			<p>There is often a disparity of opinion and public attitudes towards renewable energy development from adverse to positive. Third party representations often refer to the industrial character of a solar farm. Whilst some local objectors might view a solar farm in this way, equally, other people would simply view solar farms as essential infrastructure that should be delivered as a matter of urgency to tackle climate change.</p> <p>In light of this, a precautionary approach is applied to the LVIA which assumes that all the effects are considered to be 'adverse' unless otherwise stated. Notwithstanding this precautionary approach there are many positive effects that would arise through the proposed landscape mitigation and enhancement measures which have also been taken into account within the LVIA.</p> <p>The character and appearance of the Order limits would change from arable farmland to a utility-scale solar PV development. However, due to landform and the framework of woodlands, treebelts and hedgerows proposed, the Solar PV Site would appear subdivided and compartmentalised.</p> <p>The mass, scale and form of the Solar PV Site and Onsite Substation would not be viewed as a continuous block of development as the 'modular' characteristics of solar development allow it to sit within the existing landscape fabric ed . These factors would assist to reduce the overall perceived scale of the development.</p>
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			Furthermore, the Applicant considers that it is improving the recreational resource in the area through the network of permissive paths proposed to be created. Impacts to PRowWs have been considered throughout design development
Landscape and Visual	Impact of solar panels	Overshadowing - The proposed Solar Panels are too high at 3 metres plus and the installation of hundreds of CCTV cameras will negatively affect the people that use the area as an amenity.	The Applicant has assessed potential effects on landscape and visual receptors in the Environmental Statement Chapter 6: Landscape and Visual [APP-036]. This has assessed the solar panels based upon the maximum height parameter of 3.3 metres. This is to allow a degree of flexibility with emerging technology in terms of the fixed south facing and the single access tracker solar panels and shown in Figure 5.2: Illustrative Elevations for Fixed South Facing and Single Axis Tracker Arrays [APP-120]. The CCTV cameras would be positioned on timber poles up to 3.5m in height and located inside the security fencing to reduce their visual impact. The CCTV cameras would use night vision technology which would be monitored remotely and avoid the need for night-time lighting. No areas of the PV arrays would be continuously lit. For security requirements, Passive Infra-red Detector (PID) systems (or similar) will be installed around the perimeter of the PV Arrays to provide night vision functionality for the CCTV.
Construction	Impact of construction traffic	Disturbance – The two year plus construction period with up to 400 workers per day working six days a week for 12 hours a day will destroy the rural area and	Operational noise created by the Proposed Development was assessed in line with relevant standards and guidance in Chapter 10 of the ES

		<p>the small roads used by many as a local amenity. The construction traffic and noise will negatively affect the many walkers, runners, cycle and horseback riders that frequent the locality. Children's safety will be compromised especially when crossing to enter and or exit the school buses that take them to school. Noise created by the operating plant and equipment (should the Solar Farm be built) will affect the people of Essendine. Overbearing – The scale of the proposed Solar Farm at 2000 plus acres is extraordinarily large with its boundaries stretching for miles.</p>	<p><b>[APP-040]</b> taking into account the nature of the baseline character of the noise environment in the area. No significant adverse effects are expected. No significant effects from noise are also anticipated during construction (including from traffic).</p> <p>Highways condition surveys will be undertaken to determine the state of the existing highway, the scope of which will be agreed with RCC and LCC. The Applicant will repair any damaged highways as a result of construction traffic to a standard set out in the pre-construction surveys. Enabling works will also be provided at the access points across the Order limits to upgrade the existing access points to an appropriate standard.</p> <p>The delivery hours of HGVs to the primary compound will be restricted to avoid morning and evening peak hours, as well as avoiding School drop-off and pick up hours – meaning on weekdays HGV deliveries to the primary compound will only take place between 09:00-15:00. This will be secured by way of requirement in the DCO through the final CTMP.</p>
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<p>Landscape and Visual</p>	<p>Impact of surrounding visuals</p>	<p>Layout and Density – the proposed Solar Farm will require approximately 80 shipping container sized buildings to accommodate transformers and container invertors plus additional equipment and technology to manage the site. These buildings will be a visual blot on the landscape and are not in keeping with the rural environment.</p>	<p>The actual number of solar stations would be confirmed as part of the detailed design. The maximum design parameters of the solar stations are set out within Table 1 of Appendix 5.1 <b>[App-053]</b>, and would comply with the Design Guidance outlined within the Design and Access Statement <b>[APP-204]</b>. The solar stations would be located within interior areas of the Solar PV Site to ensure they are not positioned at close proximity to the existing PRow and permissive routes passing through the Order Limits. The central inverters and transformer buildings would be partially screened by the proposed solar panels and would also be painted in dark green or muted colour to ensure they appear recessive and integrated into the wider landscape.</p> <p>It is acknowledged that the character and appearance of the Order limits would change from arable farmland to a utility-scale solar PV development. However, due to landform and the framework of woodlands, treebelts and hedgerows proposed, the Solar PV Site would appear subdivided and compartmentalised.</p> <p>The mass, scale and form of the Solar PV Site and Onsite Substation would not be viewed as a continuous block of development as the ‘modular’ characteristics of solar development allow it to sit within the existing landscape fabric ed . These factors would assist to reduce the overall perceived scale of the development.</p>
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<p>Landscape and Visual</p>	<p>Impact of surrounding visuals</p>	<p>Out of Character – The areas in and around Essendine are agricultural not industrial. Essendine is home to two small industrial estates that house small businesses such as carpenters, kitchen designers, lighting specialists, a gym, a children’s play centre, vehicle garages and storage facilities. All of these small local businesses are hidden from the village, due to the topography of the landscape they are hidden in a valley. Adding a 2000 plus acre industrial zone to three sides of a small agriculturally surrounded rural village with 350 residents is not in keeping with the character of the existing environment.</p>	<p>The potential impacts to the landscape and visual resource, including settlements, has been comprehensively assessed in accordance with best practice guidance and informed by consultation with stakeholders.</p> <p>The results of this assessment are set out in detail within the LVIA [APP-036].</p> <p>Paragraph 6.2.9 of the LVIA notes that there is often a disparity of opinion and public attitudes towards renewable energy development from adverse to positive. Third party representations often refer to ‘the industrial character of a solar farm’. Whilst some local objectors might view a solar farm in this way, equally, other people would simply view solar farms as essential infrastructure that should be delivered as a matter of urgency to tackle climate change.</p> <p>In light of this, a precautionary approach is applied to the LVIA which assumes that all the effects are considered to be ‘adverse’ unless otherwise stated. Notwithstanding this precautionary approach there are many positive effects that would arise through the proposed landscape mitigation and enhancement measures which have been taken into account within this assessment.</p> <p>Furthermore, a Residential Visual Amenity Assessment (RVAA) has been undertaken considering potential impacts to dwellings in close proximity to the Order Limits [APP-057] with the</p>
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			<p>Proposed Development assessed as not exceeding the Residential Visual Amenity Threshold for any dwelling.</p> <p>The Design and Access Statement <b>[APP-204]</b> sets out how the design of the Proposed Development has responded to its context, including the Design Principles which have informed the design.</p> <p>The Green Infrastructure Strategy Plan <b>[APP-173]</b>, Figure 6.11 of the LVIA, the Outline Landscape and Ecology Management Plan <b>[APP-210]</b> and the Work Plans <b>[APP-006]</b> illustrate the areas near to settlements proposed as Mitigation and Enhancement Areas and detail how the retained and new planting proposed will be managed.</p>
Landscape and Visual	Impact of surrounding visuals	Substation – The construction of manmade structures approx 13 metres high that are visible from the A6121 will create an industrial eyesore in a rural agricultural environment.	<p>The Onsite Substation is positioned at close proximity to the existing 400kV Ryhall sub-station and near to the existing railway line and industrial buildings to the south of Essendine. The potential effects arising from the Onsite Substation has been assessed within the LVIA <b>[APP-036]</b>.</p> <p>The Design and Access Statement <b>[APP-204]</b> sets out how the design of the Proposed Development has responded to its context, including the design principles which have informed the design.</p> <p>The location of the Primary Substation is distant from settlements and the A6121. Photomontage 11</p>



			<b>[APP-150]</b> from the LVIA illustrates the likely visibility of the Onsite Substation from the A6121.
Transport and Traffic	Impact on traffic and PRowS	Road Safety – Is an issue in all local villages, adding to the risk with the addition of hundreds of Transit type vans and HGV’s for a construction period of two years, plus the required ongoing maintenance of the proposed Solar Farm in the next years will add increased road risk to the children, elderly and people that use the area as a relaxation amenity. The small local roads do not have public footpaths installed traversing roads with increased construction traffic creates an unsatisfactory risk for both driver and pedestrian, cyclist or horseback rider.	<p>The construction traffic impact assessment is set out in ES Chapter 9 Highways and Access <b>[APP-039]</b>.</p> <p>The assessment identified that the Proposed Development will result in a negligible increase in traffic on the majority of the local network, with less than a 2% increase in the daily vehicle flows. Where there is a greater impact on Uffington Lane, mitigation is proposed in the form of passing places and widening at the junction with the A6121.</p> <p>An assessment of pedestrian amenity, fear and intimidation and accidents and road safety is also provided within ES Chapter 9 Highways and Access. The assessment concludes that the impacts on these effects will be negligible.</p> <p>The delivery hours of HGVs to the primary compound will be restricted to avoid morning and evening peak hours, as well as avoiding School drop-off and pick up hours – meaning on weekdays HGV deliveries to the primary compound will only take place between 09:00-15:00. This will be secured by way of requirement in the final CTMP.</p>
Water Resources and Ground Conditions	Flood Risk	Drainage and flood risk – The Solar Farm will be built of 500,000 plus Solar Panels, these panels will be fixed to the ground with enormous amounts of concrete and or drilling stakes into the ground. These fixing methods will disturb the existing rain water	The Applicant has undertaken an assessment of the potential effects of the Proposed Development on water resources and ground conditions in Chapter 11 of the Environmental Statement <b>[APP-041]</b> .

		<p>management of the land and create potential flooding risks in Essendine and the wider locality.</p>	<p>At paragraph 11.4.53, there is an assessment of the potential impacts of the installation of the Solar PV Site's Mounting Structures on the functionality of the existing land drainage network. It finds that even in the absence of good construction practices (such as a watching brief and pipe reinstatement) the artificial drainage network is likely to still be able to function as water would gravitate around the racking system and drain to the existing outfalls. Appendix 11.6: Outline Surface Water Drainage Strategy of the ES [APP-087] describes how surface water run-off from all aspects of the Development will be managed through planting denser vegetation which will increase the interception potential of surface water within the Solar PV Site relative to the existing land use. A Flood Risk Assessment has also been undertaken and can be found in Appendix 11.5 of the ES [APP-086]. It says in Section 3 that the implementation of the measures in the Outline Surface Water Drainage Strategy will prevent an increase in flood risk elsewhere.</p>
Supply Chain	Human Rights	<p>Human Rights Infringement – The developer states in their DCO submission “The order has the potential to infringe the human rights of persons...” The residents of Essendine are fortunate to have laws in the UK that protect them from Human Rights infringements. Essendine Parish Council object in the strongest possible terms against any organisation that wishes to construct an industrial facility that will infringe human rights.</p>	<p>This statement is made in the Statement of Reasons [APP-021], which notes that human rights considerations are relevant in the context of compulsory acquisition proposals, and explains how the Applicant's compulsory acquisition proposals are acceptable in light of those considerations.</p>

Land and property	Compulsory Acquisition	<p>Compulsory Acquisition – The developer wishes to compulsory acquire rights over land owned by Essendine Parish Council. Essendine Parish Council object in the strongest possible terms to these compulsory acquisition rights being granted. This is land that is owned by the public for the public, its rights should not be given away to any individual or corporate body.</p>	<p>The Applicant considers that full reasons and justifications for the inclusion of the compulsory acquisition of rights have been detailed in the <b>Statement of Reasons [AS-009]</b>.</p> <p>Importantly, the Applicant does not propose to compulsorily acquire the Parish Council’s interests in land that it actively uses.</p> <p>The Parish Council are identified as holding an interest in plot 02-087, being Bourne Road, which is part of the cable corridor through Essendine Village. The Parish Council’s interest in this plot is listed as the title to this land is unregistered, and as a highway, it is therefore <i>presumed</i> (which is a rebuttable presumption) that the Parish Council hold an interest in the land underneath the highway under the ‘ad medium filum’ rule. It is this subsoil which is sought to be subject to the compulsory acquisition of rights for the cable corridor.</p> <p>The impacts to the Parish Council are therefore minimal, however the Applicant is willing to discuss them with the Parish Council.</p>
Traffic and Transport	PRoW	<p>Loss of public and local recreational amenity – The residents of Essendine and the walkers, runners, cycle and horseback riders that frequent the locality and the currently infrequently used, by vehicles, roads as a local amenity will lose the current amenity that is provided by unfenced agriculture fields and hedgerows.</p>	<p>The Design and Access Statement <b>[APP-204]</b> sets out how the design of the Proposed Development has responded to its context, including the design guidance applied to PRoW.</p> <p>All existing PRoW will be retained in their existing alignment. Whilst temporary closures may be needed during construction, no permanent closures</p>

			<p>are proposed. The outline Construction Environmental Management Plan (CEMP)[<b>APP-207</b>] sets out the measures to be implemented during the construction phase in relation to the PRowWs that cross the Solar PV site.</p> <p>In addition, a total of 8.1km of new permissive paths form part of the proposed development, creating new routes to previously non-publicly accessible areas and improving wider PRowW network connectivity.</p> <p>A Recreational and Amenity assessment was undertaken and is presented in the ES Chapter 6 Appendix 6.5 [<b>APP-058</b>] which concluded that whilst impacts to PRowW within the Solar PV site during construction would be significant, operation effects would not be significant following mitigation post 15 years when mitigation planting has matured. In relation to the two PRowWs within the Solar PV Site where this is not the case (Bridleways E169 and E182) offsets of at least 15m are proposed along with new planting so that overtime the impact on the recreational amenity of these routes will reduce (although still acknowledged to be significant in LVIA terms).</p>
Construction	Impact of construction traffic	During the construction period hundreds of Transit type vans, heavy construction equipment and HGVs will be using these roads with the effect of halting the unfettered access to this great amenity we currently have.	Construction vehicles will only use the permitted routes to access the Order Limits. This will ensure that only the roads deemed suitable and appropriate are used. This will be secured by way of requirement in the DCO through the final CTMP. Breaching the requirements of the DCO is a criminal offence. These routes are described in detail within the oCTMP [ <b>APP-212</b> ].

			<p>Condition surveys will be undertaken to determine the state of the existing highway, the scope of which will be agreed with RCC and LCC. The Applicant will repair any damaged highways as a result of construction traffic to a standard set out in the pre-construction surveys. Enabling works will also be provided at the access points across the Order limits to upgrade the existing access points to an appropriate standard.</p> <p>Further details of the mitigation measures for managing construction traffic can be found within the oCTMP <b>[APP-212]</b>.</p>
Traffic and Transport	PRoW	Public Rights of way compromised – Existing rights of way will be moved/changed. These rights of way have existed for years and are used by Essendine residents and members of the public use them as a health enhancing amenity.	<p>The Design and Access Statement <b>[APP-204]</b> sets out in detail on how the design of the Proposed Development has responded to its context, including the design principles applied to PRoW to minimise impacts to users of these routes.</p> <p>All existing PRoW will be retained in their existing alignment. Whilst temporary closures may be needed during construction, no permanent closures are proposed.</p> <p>In addition, a total of 8.1km of new permissive paths is proposed as part of the Proposed Development, creating new routes to previously non-publicly accessible areas and improving wider PRoW network connectivity.</p> <p>A Recreational and Amenity assessment was undertaken and is presented in the ES Chapter 6</p>

			Appendix 6.5 [APP-058], which concluded that whilst impacts to PRoW within the site during construction would be significant, operational impacts would not be significant following mitigation post 15 years when mitigation planting has matured. In relation to the two PRoWs within the Solar PV Site where this is not the case (Bridleways E169 and E182) offsets of at least 15m are proposed along with new planting so that overtime the impact on the recreational amenity of these routes will reduce (although still acknowledged to be significant in LVIA terms).
Ecology and Biodiversity	Impact on habitats and existing biodiversity	Biodiversity - Effect on trees/wildlife/nature – the existing biodiversity is extensive and has naturally evolved over thousands of years, the area is home to many wild animals including red kites, badgers and herds of deer that roam freely. This existing biodiversity will be negatively affected with construction, the use of thousands of tonnes of concrete and miles of animal proof fencing to keep the animals away from the solar panels.	The Ecology and Biodiversity ES chapter [APP-037] assesses the impacts to ecological receptors of the Proposed Development and concludes that no residual significant adverse effects will arise.
Cumulative Impacts	Impact on health and wellbeing	Destruction of health and wellbeing assets – the residents of Essendine and the wider local population use the area around Essendine as a natural free environment to improve and enhance their health and wellbeing, the construction of the Solar Farm will remove this environmental health improving asset from the arms of the population. The introduction of fenced-in fields, cctv and security lighting will not add any value to the health and wellbeing of the community and in fact will diminish it.	The Design and Access Statement [APP-204] sets out in detail on how the design of the Proposed Development has responded to its context, including the design principles applied to PRoW to minimise impacts to users of these routes. All existing PRoW will be retained in their existing alignment. Whilst temporary closures may be needed during construction, no permanent closures are proposed. In addition, a total of 8.1km of new permissive paths is proposed as part of the Proposed Development, creating new routes to previously non-publicly

			<p>accessible areas and improving wider PRow network connectivity.</p> <p>A Recreational and Amenity assessment was undertaken and is presented in the ES Chapter 6 Appendix 6.5 <b>[APP-058]</b> which concluded that whilst impacts to PRow within the Solar PV site during construction would be significant, operation impacts would not be significant following mitigation post 15 years when mitigation planting has matured. In relation to the two PRow within the Solar PV Site where this is not the case (Bridleways E169 and E182) offsets of at least 15m are proposed along with new planting so that overtime the impact on the recreational amenity of these routes will reduce (although still acknowledged to be significant in LVIA terms).</p> <p>CCTV cameras would use night-vision technology, which would be monitored remotely and avoid the need for night-time lighting. No areas of the PV Arrays are proposed to be continuously lit. For security requirements, Passive Infra-red Detector (PID) systems (or similar) will be installed around the perimeter of the PV Arrays to provide night vision functionality for the CCTV.</p> <p>The Planning Inspectorate agreed in their EIA Scoping Opinion <b>[APP-050]</b> that human health impacts should be addressed through the relevant technical assessments:</p> <ul style="list-style-type: none"><li>• Highways and Access <b>[APP-039]</b></li><li>• Noise and Vibration <b>[APP-040]</b></li></ul>
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			<ul style="list-style-type: none"> <li>Other Environmental Topics including Air Quality, Glint and Glare, Major Accidents and/or Disasters and Utilities) <b>[APP-045]</b></li> </ul> <p>These assessments conclude that there would be no significant adverse effects on human health.</p>
Noise	Impact of noise on local residents	Noise – The developer in their submission states substantial levels of noise will be generated, creation of additional noise is not acceptable to the residents of Essendine.	<p>Noise created by the Proposed Development has been assessed in line with relevant standards and guidance in Chapter 10: Noise and Vibration of the Environmental Statement <b>[APP-040]</b>.</p> <p>In accordance with the relevant policy guidance, reasonable steps have been proposed to minimise potential effects of noise from the Proposed Development, through best practicable means during construction and decommission and locating electrical plant away from sensitive receptors. Predicted operational noise levels during day-time periods (when the electrical plant is most likely to operate at maximum capacity) were low in absolute terms and comparable to/lower than existing baseline noise levels during quiet periods of the day. Higher noise levels would be generated locally during the construction/decommission phases, but this would be temporary and localised.</p> <p>The assessment concluded that, following the implementation of the relevant mitigation measures, no significant adverse effects related to noise levels from construction, operation or decommission of the Proposed Development are expected.</p>



Lighting	Light pollution and impact on wider area	<p>Light Pollution – The develop states the construction period will last for 2 years, 6 days a week, 12 hours a day with up to four hundred workers working on site per day. The winter, autumn, and spring periods (for the working safety of the construction people) will require huge amounts of lighting for long periods of time, creating massive light pollution. Additionally, it is expected when constructed the solar farm will require significant lighting to manage the site in a safe way.</p>	<p>Mitigation measures to manage construction lighting impacts are secured through the requirements set out within the draft DCO and are the Outline construction environmental management plan <b>[APP-207]</b>. Temporary construction lighting will be designed as far as reasonably practicable so as to minimise artificial light spill from the Order limits and will not be continuously lit. Lighting will be kept to a minimum during construction works. Core construction working hours will be 07:00 – 19:00 Monday to Saturday (excluding works likely to generate substantial levels of noise which will be limited to 13:00 on Saturdays). Throughout the Order limits, motion detection security lighting will be used to avoid permanent lighting and the inward distribution of light will avoid light spill on to existing boundary features.</p> <p>During operation, no part of the Solar PV Site will be continuously lit. CCTV cameras would use night-vision technology, which would be monitored remotely and avoid the need for night-time lighting. For security requirements, Passive Infra-red Detector (PID) systems (or similar) will be installed around the perimeter of the PV Arrays to provide night vision functionality for the CCTV.</p>
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**Uffington Parish Council (RR-1187)**

Topic	Theme	Statutory Consultee Comment	MPSF Response
Land Use and Soil	Loss of Prime Agricultural land	The principal objection to centering a solar farm on Essendine and its neighbouring rural villages relates to the loss of prime agricultural land with the resultant need to import more food from abroad and a consequent increase in the carbon footprint of the food supply chain.	<p>The great majority of the land will not be permanently affected as an agricultural resource by the installation of panels as part of the Proposed Development. An assessment of the areas affected by tracks, solar stations and the substation is set out in the ES Chapter 12 at Table 12-6 [APP-114]. The area extends to 0.5ha of Grade 2 and 3.7ha of sub-grade 3a land within the Best and Most Versatile agricultural land definition.</p> <p>The calculation of the area affected by the substation includes a larger area than the footprint, and the actual area involved is smaller, ES 12.4.45 [APP-114].</p> <p>The areas affected by tracks and solar station areas are capable of being restored to comparable agricultural use and quality at decommissioning but again a precautionary approach has been taken in the assessment and these areas have been included as potentially lost to agricultural use, ES paragraph 12.4.16 to 18 [APP-114].</p> <p>Consideration of the food production and economic implications of the use of the BMV land for the Proposed Development compared to the production from poorer quality land are set out in the ES at sections 12.4.83 and Table 12-11 [APP-114].</p> <p>The incremental reduction of crop production from the BMV land compared to non-BMV land is of the</p>

			<p>order of 250 tonnes (ES 12.4.84) from an annual production of 21million tonnes (ES 12.4.76).</p> <p>The economic implications (benefits) for local farms and the increased local farm labour needed for managing the sheep is set out in the ES Chapter 12 at paragraphs 12.4.96 and 12.4.97 <b>[APP114]</b>.</p>
Landscape and Visual	Negative visual impact	The negative visual impact that the solar panels, security fences and lighting would have on the countryside.	<p>The potential impacts of the Proposed Development (including panels, fencing and lighting) on the landscape and visual resource have been comprehensively assessed in accordance with best practice guidance and informed by consultation with stakeholders. Furthermore, considerable efforts have been made to minimise the landscape and visual impacts of the Proposed Development. The results of this assessment are set out in detail within the LVIA within Chapter 6 of the Environmental Statement <b>[APP-036]</b>, and these conclude that there are limited localized significant residual effects.</p> <p>The Design and Access Statement <b>[APP-204]</b> sets out in detail how the design of the Proposed Development has responded to its context, including the Design Principles applied to minimise these effects.</p>
Green Infrastructure	Loss of green spaces and PRoWs	The reduction in the number of traditional footpaths and bridleways and the detrimental effect of the loss of green space and exercise opportunities on physical and mental health.	The Design and Access Statement <b>[APP-204]</b> sets out in detail on how the design of the Proposed Development has responded to its context, including the Design Principles applied to PRoW to minimise impacts to users of these routes.

			<p>All existing PRoW will be retained in their existing alignment. Whilst temporary closures may be needed during construction, no permanent closures are proposed.</p> <p>In addition, a total of 8.1km of new permissive paths is proposed as part of the Proposed Development, creating new routes to previously non-publicly accessible areas and improving wider PRoW network connectivity.</p> <p>A Recreational and Amenity assessment was undertaken and is presented in the ES Chapter 6 Appendix 6.5 [APP-058] which concluded that whilst impacts to PRoW within the Solar PV site during construction would be significant, operation impacts would not be significant following mitigation post 15 years when mitigation planting has matured. In relation to the two PRoWs within the Solar PV Site where this is not the case (Bridleways E169 and E182) offsets of at least 15m are proposed along with new planting so that overtime the impact on the recreational amenity of these routes will reduce (although still acknowledged to be significant in LVIA terms).</p>
Environment	Impact on local environment	A possible increased risk of flooding and potential destruction of undiscovered archaeological sites. A possible negative impact on tourism.	These matters have been discussed in the Environmental Statement with a conclusion that no significant adverse flooding or tourism effects are identified to arise as a result of the Proposed Development. Archaeological impacts will also be appropriately mitigated, pursuant to the DCO, such that no likely significant adverse effects have been identified.

Highways and access	Construction impacts	The obstruction of country lanes, atmospheric pollution and a risk of accidents to car drivers, horse riders and pedestrians that would be caused by site traffic during the construction phase.	<p>Construction vehicles will only use the permitted routes to access the Order Limits. This will be secured by way of requirement in the DCO through the final CTMP. Breaching the requirements of the DCO is a criminal offence. These routes are described in detail within the oCTMP.</p> <p>Condition surveys will be undertaken to determine the state of the existing highway, the scope of which will be agreed with RCC and LCC. The Applicant will repair any damaged highways as a result of construction traffic to a standard set out in the pre-construction surveys. Enabling works will also be provided at the access points across the Order limits to upgrade the existing access points to an appropriate standard.</p> <p>Further details of the mitigation measures for managing construction traffic can be found within the oCTMP.</p>
Decommissioning	The site is not being properly cleared.	Worries that the site might expand over time and that at the end of its operational life it might not be properly cleared and returned to farmland and open countryside, with safe and efficient recycling of the solar panels and other infrastructure and equipment.	All the solar infrastructure including PV modules, mounting structures, cabling on or near the surface, inverters, transformers, switchgear, fencing, ancillary infrastructure and the Onsite Substation would be removed and recycled or disposed of in accordance with good practice following the waste hierarchy, with materials being reused or recycled wherever possible. All waste will be disposed of in accordance with the legislation at the time of decommissioning.

			<p>Any requirement to leave the internal access tracks would be discussed and agreed upon with the landowners at the time of decommissioning. The Solar PV Site would be reinstated in accordance with a Decommissioning Environmental Management Plan (DEMP). The DEMP will be required to be in accordance with the <b>outline Decommissioning Environmental Management Plan (oDEMP) [APP-209]</b></p> <p>The DEMP will be subject to the approval of the local planning authorities. It is likely that decommissioning would include the removal of any permissive paths and the potential reversion of grassland underneath the PV Arrays.</p>
Ecology and Biodiversity	Loss of habitat	Despite the proposed additional hedgerow, tree and wildflower planting, concerns remain about ecological damage to the local environment, with a loss of wildlife habitat and biodiversity.	The Environmental Statement [APP-037] concludes that no likely significant adverse effects to ecological features are expected to arise as a result of the Proposed Development.

**North Kesteven District Council (RR-0855)**

Topic	Theme	Statutory Consultee Comment	MPSF Response
Land Use and Soil	Cumulative impact on BMV	<p>North Kesteven District Council is concerned to ensure that the potential development of the Mallard Pass solar farm along with the other registered/proposed NSIP solar farms in North Kesteven and West Lindsey takes account of cumulative impacts on BMV land across the County. We requested that cumulative BMV/agricultural land impacts were scoped into the Land Use chapter of the ES and that cumulative agricultural land impacts are considered across the registered projects.</p>	<p>Matters relating to land use such as whether the land is farmed for cereals or farmed for energy crops or biodiversity, is a matter for the landowners and is a an economic rather than an environmental consideration. The cumulative effects with other schemes have not therefore been considered, as set out in the ES Chapter 12 at section 12.8 [APP-042]. Chapter 12 also sets out the context in which the Proposed Development's impacts can be understood in terms of the regional and national availability of BMV land.</p> <p>The effect on land is reversible, with only small areas affected by fixed infrastructure. Therefore other potential developments as identified in the ES are not considered cumulatively, as set out in the ES Chapter 12 at 12.8 [APP-042].</p>

**Stamford Town Council (RR-1081)**

Topic	Theme	Statutory Consultee Comment	MPSF Response
Statement of Need	Location and technology solution	<p>The proposal only looks at one technology option, location and site. It can therefore be considered to be sub-optimal, which at a time of Climate Crisis is unacceptable.</p> <p><del>It offers no supporting data and information, again, suggesting it is non optimal (not a serious researched professional proposal).</del></p> <p>It appears to centre around leveraging the currently available Ryhall Substation surplus capacity (investment avoidance/sunk cost).</p> <p>It proposes only one technology solution – solar panel (specification, installation configuration, and source unclear).</p> <p><del>It is being proposed by a company (Windel Energy) with no clear track record of running projects of any scale.</del></p>	<p><b>Paragraphs 3.3.17-18 of the Statement of Need [APP-202]</b> explains Government’s view that irradiance, site topography and proximity to suitable connection points to the transmission network, are likely to be key inputs to site selection.</p> <p><b>Section 7.5 of the Statement of Need</b> describes the site selection process for large-scale solar more fully, and <b>Section 7.7 of the Statement of Need</b> sets out how the design of the Proposed Development seeks to maximise utilisation of the grid connection capacity available at Ryhall Substation.</p> <p>A Site Selection report is appended to the <b>Planning Statement [APP-203]</b> which provides an overview of the site selection process undertaken by the Applicant to identify the location of the Proposed Development, and further analysis of the evolution of the design of the Proposed Development (including consideration of other technologies) can be found in the <b>Environmental Statement Chapter 4: Alternatives and Design Development [APP-048]</b>.</p> <p>The Applicant is well placed to build the Proposed Development as set out in the Funding Statement [APP-022].</p> <p>The Applicant notes the provisions of article 44 of the draft DCO in this regard, which provides that no land powers can be utilised without the Secretary of</p>



			<p>State first approving a form of guarantee or other security for compensation costs. Funding will be available for the project, as set out in the Funding Statement [APP-022]</p> <p>It is also noted that breach of a DCO is a criminal offence, and with the various mitigation measures secured in the DCO, the responsible building of the Proposed Development can be assured</p>
Ecology and Biodiversity; Land use	Lack of enhancement and loss of food production.	It does nothing to enhance the local natural environment and biodiversity, and reduces the potential for local food production.	<p>The Proposed Development does not cause any likely significant effects to ecological features [as seen in the Ecology and Biodiversity ES chapter, <b>[APP-037]</b>, and in fact leads to a net gain for both habitats (72.19%) and hedgerow (40.83%).</p> <ul style="list-style-type: none"> <li>•</li> </ul>
Planning Statement	Local Plan	It does not conform to South Kesteven District Council's Local Plan.	<p>The Applicant has carried out a planning assessment in response to all relevant Policies within the Local Plan and Renewable Energy Appendix 3, as part of the DCO application, which can be found in Tables 6 and 7 – South Kesteven District Council Local Planning Policy - Table of Compliance, Appendix 3, within the Planning Statement <b>[APP-203]</b>. These conclude that the Proposed Development is not incompatible with the Local Plan.</p>

**Barholm and Stowe Parish Council (RR-0089)**

Topic	Theme	Statutory Consultee Comment	MPSF Response
Land Use and Soils	Loss of Agricultural land / food shortage	The use of good grade 2 agricultural land for this purpose is not sensible, it should be used for food production; and other lower grade land used for power generation	<p>The amount of Grade 2 within the Solar PV Site and field margins area is 35ha as set out in Table 12-1 of Chapter 12 of the ES [APP-114].</p> <p>The great majority of the land will not be permanently affected as an agricultural resource by the installation of panels as part of the Proposed Development. An assessment of the areas affected by tracks, solar stations and the substation is set out in the ES Chapter 12 at Table 12-6 [APP-114]. The area extends to 14.4ha of which 0.5ha is Grade 2 and 3.7ha is sub-grade 3a land within the Best and Most Versatile agricultural land definition.</p> <p>Consideration of the food production and economic implications of the use of the BMV land for the Proposed Development compared to the production from poorer quality land are set out in the ES at sections 12.4.83 and Table 12-11 [APP-114].</p> <p>The incremental reduction of crop production from the BMV land compared to non-BMV land is of the order of 250 tonnes (ES 12.4.84) from an annual production of 21million tonnes (ES 12.4.76).</p> <p>The land will continue to be farmed. The economic implications (benefits) for local farms and the increased local farm labour needed for managing the</p>

			sheep is set out in the ES Chapter 12 at paragraphs 12.4.96 and 12.4.97 <b>[APP114]</b> .
Design and Access	Size and Scale	The size of this project is vast; and it is believed that it is too bigger area to be consumed by panels as one project; if it has to proceed, it should be made smaller.	<p>There is an urgent need for renewable energy projects to deliver the Government’s legally binding commitment to net zero, which cannot be reached with the delivery of small sites alone – projects are needed to deliver energy at scale, as discussed in the section 8.5 <b>Statement of Need [APP-202]</b>, which concludes that the development of large sites (which connect to the transmission network) is essential in order to connect the scale of new capacity required to meet Net Zero requirements. On this basis, the emphasis should be on maximising the use of available capacity at grid connections where they occur. Consideration was therefore given to areas in the UK where grid connections were available and that were suitable for solar development.</p> <p>The <b>Statement of Need [APP-202]</b> includes, in <b>Section 8.6</b>, an analysis of the impacts of smaller versus larger solar schemes on operation of the UK’s electricity system. The section concludes that the Proposed Development will bring significant benefits to the operation of the UK’s electricity system which smaller facilities alone would not be able to deliver. <b>Section 10.4</b> of the <b>Statement of Need</b> also includes an analysis of the relative costs savings and carbon benefits delivered by large-scale single-site solar, versus developing the same total capacity across multiple projects.</p>

			<p><b>Chapter 12</b> of the <b>Statement of Need</b> concludes that Large scale solar is therefore needed in the UK (alongside smaller developments) to support full decarbonisation of UK electricity and energy consumption, improve security of supply and keep costs for consumers as low as possible.</p>
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**APPENDIX 4 - APPLICANT'S RESPONSES TO 16 RELEVANT REPRESENTATIONS  
SUBMITTED BY NON-STATUTORY ORGANISATIONS.**

**Response to Non-statutory bodies and community groups Relevant Representations**

<b>Solar Campaign Alliance (RR-1076)</b>			
<b>Topic</b>	<b>Theme</b>	<b>Statutory Consultee Comment</b>	<b>MPSF Response</b>
Land use and soils	Impact on arable land	The scheme does not comply with NPPF which stipulates that valuable farmland should be avoided. The land at the Mallard Pass Solar site sustains a range of high yielding arable crops.	<p>The NPPF and its relevant policies are covered in the ES Volume 2 Appendix 12.1 [APP-088] and it is noted that the economic benefits of BMV land need to be recognised. The Scheme’s compliance with the policies of the NPPF and the NPS in respect of agricultural land is set out in section 7.4 of the Planning Statement.</p> <p>Consideration of the food production and economic implications of the use of the BMV land for the Proposed Development compared to the production from poorer quality land are set out in the ES at sections 12.4.83 and Table 12-11 [APP-114].</p> <p>The incremental reduction of crop production from the BMV land compared to non-BMV land is of the order of 250 tonnes (ES 12.4.84) from an annual production of 21million tonnes (ES 12.4.76).</p> <p>As such, the Applicant considers that it is in compliance with the NPS and NPPF.</p>
Land use and soils	Food security	The UK is currently importing a large proportion of its food, and restricted supply and food rationing is becoming more prevalent across the UK. Food security must be considered when looking at	Consideration of the food production and economic implications of the use of the BMV land for the Proposed Development compared to the production from poorer quality land are set out

		<p>planning proposals that include vast areas of highly productive farmland.</p>	<p>in the ES at sections 12.4.83 and Table 12-11 <b>[APP-114]</b>.</p> <p>The incremental reduction of crop production from the BMV land compared to non-BMV land is of the order of 250 tonnes (ES 12.4.84) from an annual production of 21million tonnes (ES 12.4.76).</p> <p>There are no policies or obligations to farm agricultural land in any particular farming manner or to any particular crop or stocking, see the ES Chapter 12 at 12.4.67 and 68.</p> <p>Agricultural use in the form of livestock grazing will continue under and around the panels, and on retained agricultural land. In short, the Applicant considers that the Proposed Development will not have an impact to food security.</p>
<p>Planning Statement</p>	<p>Consenting Strategy</p>	<p>We do not believe that the impacts can be considered “temporary”.</p>	<p>The Planning Statement <b>[APP-203]</b> addressed project lifetime at paragraphs 5.3.27 to 5.3.33.</p> <p>This confirms that the Applicant is not seeking a time limited consent, as the ES has not identified any specific project impact which would require the development to be linked to a specific operational timeframe. However, as noted in NPS EN-3, it is recognised that solar panel efficiency deteriorates over time and the electrical infrastructure will have an operational lifespan, after which it will need to be replaced or removed.</p>

			<p>The Applicant is not however proposing a systematic repowering or wholesale replacement of PV modules or of other infrastructure across the Order limits, beyond routine servicing and maintenance and therefore while a time limited consent is not sought, it is anticipated that the development will be decommissioned at some point in the future.</p> <p>Whilst the EIA has assessed the operational impacts of the Proposed Scheme as permanent, it is the case that any impacts caused by the proposed development related to the use of the land are considered to be reversible, pursuant to the management plans secured by the DCO application.</p>
Site Selection	Impact on landscape and lack of mitigation measures	We have concerns about the site selection process and the significant impact that this scheme would have on the local landscape and on those who enjoy this landscape. This includes the inadequacy of the suggested mitigation measures.	<p>The potential impacts on the landscape and visual resource, including settlements have been comprehensively assessed in accordance with best practice guidance and informed by consultation with stakeholders.</p> <p>The results of this assessment are set out in detail within the LVIA <b>[APP-036]</b>. and concludes that there are limited localised residual significant effects.</p> <p>Section 3.1 of the Site Selection Assessment (Appendix 1 to the Planning Statement <b>[APP-203]</b> explains how visual impacts, and the ability to</p>



			<p>mitigate them, were a consideration in the site selection process.</p> <p>The Design and Access Statement <b>[APP-204]</b> sets out how the design of the proposed development has responded to its context, including the design principles which have informed the design.</p> <p>The Green Infrastructure Strategy Plan <b>[APP-173]</b>, Figure 6.11 of the LVIA <b>[APP-036]</b> the Outline Landscape and Ecology Management Plan <b>[APP-210]</b> and the Work Plans <b>[APP-006]</b> illustrate the areas near settlements proposed as Mitigation and Enhancement Areas and detail how the retained and new planting proposed will be managed.</p>
Noise/Vibration	Impact of noise on health and well-being	We also have concerns about noise impacts and the effect of visual and noise impacts on people's mental health and well-being.	<p>The Environmental Statement has assessed the construction, operational and decommissioning noise impacts of the Proposed Development in Chapter 10: Noise and Vibration of the Environmental Statement <b>[APP-040]</b>.</p> <p>The assessment's findings at paragraph 10.13 were that with the implementation of the relevant mitigation measures, no significant adverse noise and vibration effects are expected as a result of the Proposed Development.</p> <p>The potential impacts to the landscape and visual resource, including settlements has been comprehensively assessed in accordance with best practice guidance and informed by consultation with stakeholders.</p> <p>The results of this assessment are set out in detail within Chapter 6: Landscape and Visual of the</p>

			<p>Environmental Statement <b>[APP-036]</b> and concludes that there are limited localised residual significant effects.</p> <p>The Planning Inspectorate agreed in their EIA Scoping Opinion <b>[APP-050]</b> that human health impacts should be addressed through the relevant technical assessments:</p> <ul style="list-style-type: none"> <li>• Highways and Access <b>[APP-039]</b></li> <li>• Noise and Vibration <b>[APP-040]</b></li> <li>• Other Environmental Topics including Air Quality, Glint and Glare, Major Accidents and/or Disasters and Utilities <b>[APP-045]</b></li> </ul> <p>These assessments conclude that there would be no significant effects on human health as a result of the Proposed Development.</p>
Ecology and Biodiversity	Long-term impacts on biodiversity	The SCA also has significant concerns about the biodiversity claims and assessments and long-term impacts this may have.	<p>Chapter 7: Ecology and Biodiversity, of the ES <b>[APP-037]</b>, presents the approach and findings of the assessment of potential impacts on Ecology and Biodiversity, which have been carried out in accordance with best practice. The combination of measures identified in the Green Infrastructure Strategy results in the Proposed Development delivering a Biodiversity Net Gain of 72.19% for Habitats, 40.83% for Hedgerows and 0% for Rivers (as no ditches or rivers are being enhanced as assessed by the metric) as assessed via the Department for Food, Environment and Rural Affairs (DEFRA) Biodiversity Metric 3.1.</p> <p>The habitat creation and enhancement measures are set out in the outline Landscape and Ecological Management Plan (oLEMP). <b>[APP-210]</b></p>

<p>Traffic and Transport</p>	<p>Impact on surrounding area</p>	<p>We also consider that traffic and transport impacts have not been adequately addressed.</p>	<p>The construction traffic impact assessment is set out in Chapter 9: Highways and Access, of the ES [APP-039].</p> <p>The assessment identified that the Proposed Development will result in a negligible increase in traffic on the majority of the local network, with a 2% or lesser increase in the daily vehicle flows. Where there is a greater impact on Uffington Lane from increased numbers of HGVs, mitigation is proposed in the form of passing places and widening at the junction with the A6121 to help facilitate two-way HGV flows.</p> <p>In addition, further mitigation of the transport impacts is provided through the following measures:</p> <ul style="list-style-type: none"> <li>• Access locations: the access points chosen are sufficient to accommodate HGVs and the provision of appropriate visibility splays. The use of existing access points has been prioritised to minimise the environmental impacts associated with the creation of new points of vehicular access, such as the removal of hedgerows. Where there is not a reasonable access location within the vicinity of the relevant area of the Solar PV Site, a new vehicle access has been proposed that complies with all relevant highway safety requirements.</li> <li>• Consolidation: deliveries will go directly to the primary compound, providing additional means of control and management. From the primary compound, materials will be</li> </ul>
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			<p>distributed to the secondary compounds via smaller, local vehicles.</p> <ul style="list-style-type: none"><li>• Internal routing: internal access routes will be provided within the Order limits to minimise vehicles needing to use the local road network.</li><li>• Vehicle routing: construction vehicles will only utilise the permitted access routes, secured by a requirement in the DCO. It is a criminal offence to breach this requirement.</li><li>• Shuttle service: a staff shuttle service will be deployed from the primary construction compound to transport staff to the relevant area where works are required, which will be subject to phasing.</li><li>• Restricted delivery hours: the delivery hours of HGVs to the primary compound will be restricted to avoid morning and evening peak hours, as well as avoiding school drop-off and pick up hours – meaning on weekdays HGV deliveries to the primary compound will only take place between 09:00-15:00 – minimising the impacts to users of the local road network. This will be secured by way of requirement in the DCO.</li><li>• Management plans: a number of supporting management plans are proposed including an oCEMP [APP-207], oCTMP [APP-212] and oTP [APP-215] which will be secured by way of requirement on the DCO.</li></ul> <p>The assessment within ES Chapter 9 concludes that the highway and access effects of the</p>
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			Proposed Development will be negligible. [APP-039]
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**Rutland Solar Action Group Ltd (RR-1018)**

Topic	Theme	Statutory Consultee Comment	MPSF Response
Landscape and Visual and Noise	Impact of proposed development on surrounding local visuals	I am interested in the proximity to housing and the impact this development may have from a noise as well as visual perspective.	<p>The potential impacts to the landscape and visual resource, including settlements has been comprehensively assessed in accordance with best practice guidance and informed by consultation with stakeholders.</p> <p>The results of this assessment are set out in detail within the LVIA [APP-036] and concludes that there are limited localised residual significant effects.</p> <p>Furthermore, a Residential Visual Amenity Assessment (RVAA) has been undertaken considering potential impacts to dwellings in close proximity to the site [APP-057] which concludes that the Residential Visual Amenity Threshold is not broken for the Scheme.</p> <p>Section 3.1 of the Site Selection Assessment (Appendix 1 to the Planning Statement [APP-203] explains how visual impacts to dwellings, and the ability to mitigate them, was a consideration in the site selection process</p> <p>The Design and Access Statement [APP-204] sets out how the design of the Proposed Development has responded to its context, including the design guidance which has</p>

			<p>informed the location of the Solar PV Site and solar stations.</p> <p>The Green Infrastructure Strategy Plan <b>[APP-173]</b>, Figure 6.11 of the LVIA , the Outline Landscape and Ecology Management Plan <b>[APP-210]</b> and the Work Plans <b>[APP-006]</b> illustrate the areas near to settlements proposed as Mitigation and Enhancement Areas and detail how the retained and new planting proposed will be managed.</p> <p>The Environmental Statement has assessed the construction, operational and decommissioning noise impacts of the Proposed Development in Chapter 10: Noise and Vibration of the Environmental Statement <b>[APP-040]</b>.</p> <p>The assessment's findings at paragraph 10.13 were that with the implementation of the relevant mitigation measures, no significant adverse noise and vibration effects are expected as a result of the Proposed Development.</p>
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**Mallard Pass Action Group (RR-0676)**

Topic	Theme	Statutory Consultee Comment	MPSF Response
Size and Scale	Scale of the project	<p>To date, no solar has been constructed on this scale in the UK. Consideration needs to be given as to how the harmful impacts are likely to magnify compared to a typical smaller installation. This issue of scale also feeds directly into a number of further concerns of the group.</p>	<p><b>Section 8.5 of the Statement of Need [APP-202]</b> describes and agrees with Government’s view that decentralised and community energy systems are unlikely to lead to the significant replacement of large-scale infrastructure. It is the Applicant’s view (and this aligns with Government’s view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation. This has been supplemented by the Government’s recent policy announcements in this regard in March 2023.</p> <p>As discussed in section 8.5 <b>Statement of Need [APP-202]</b>, which concludes that the development of large sites (which connect to the transmission network) is essential in order to connect the scale of new capacity required to meet Net Zero requirements. On this basis, the emphasis should be on maximising the use of available capacity at grid connections where they occur. Consideration was therefore given to areas in the UK where grid connections were available and that were suitable for solar development.</p> <p><b>Section 8 of the Planning Statement [APP-203]</b> concludes with a consideration of the Planning Balance and justifies how the overwhelming national need, as demonstrated in the <b>Statement of Need [APP-202]</b> outweighs any potential significant adverse impacts which, as the <b>Environmental Statement [APP-047]</b> sets out, are limited.</p>



			<p>Furthermore, given that the ES concludes limited localised residual visual impacts to those located closest to the main Solar site, it is not considered that a reduction is required, particularly in the context of paragraph 5.9.21 of NPS EN-1.</p>
Land and property	Compulsory Acquisition	<p>Compulsory Acquisition rights. At no stage pre-application were residents aware and/or clear of compulsory acquisition rights being requested, the justification and subsequent implications. Had this been apparent it would have been challenged.</p>	<p>During statutory consultation in May 2022, it was made clear that the DCO Application would include the compulsory acquisition of rights. This was made clear within the Section 48 notice which states at paragraph 4:</p> <p><i>“The proposed DCO will, among other things, authorise... the permanent and/or temporary acquisition of land and/or rights and overriding of easements and other rights over or affecting land”.</i></p> <p>The <b>Schedule of Negotiations and Powers Sought [APP-024]</b> provides details of the negotiations entered into prior to submission of the Application. The Applicant has signed Heads of Terms back in October 2020 and between June-August 2021 with landowners whose rights are proposed to be compulsorily acquired. Since the submission of the Application, the Applicant has continued efforts to meet with landowners and continue discussions.</p> <p>The Applicant considers that full reasons and justifications for the inclusion of the compulsory acquisition of rights have been detailed in the <b>Statement of Reasons [AS-009]</b>.</p>

			<p>The Statutory Consultation did not set out the specific location of land powers sought for any plots, but indicated the works that would be undertaken in and around where residents would be taking place. This is the common approach to consultation on NSIP projects. Importantly, as is set out in the Book of Reference <b>[APP-023]</b>, no compulsory acquisition powers are sought over residential land, but are instead limited to impacts to subsoil of adjacent highway where it is <u>presumed</u> that if title in the highway is not registered, that adjacent landowners may own the land under the highway up to the half-way point of the highway land.</p>
Landscape and Visual	Effects on landscape character and views / visual amenity including residential	<p>A technical landscape and visual assessment and full review of the submitted information are being undertaken. We are advised that the applicant's assessments are flawed, and as a result, levels of effects have been under-reported. The character of the open lightly undulating vista will be changed immeasurably and irreversibly creating an industrialized landscape and wholly undesirable place to live, work and enjoy recreation.</p>	<p>The potential impacts to the landscape and visual resource has been comprehensively assessed in accordance with best practice guidance and informed by consultation with stakeholders. The results of this assessment are set out in detail within Chapter 6: Landscape and Visual, of the ES <b>[APP-036]</b>. It is noted that whilst this solar farm is of a utility scale, the overall scale of the development would appear subdivided and compartmentalised by the landform, woodland, and hedgerows such that it would not be entirely visible from any given location. The Scheme will also be decommissioned in the future, meaning that impacts will be reversible. Furthermore, the Applicant considers that it is improving the recreational resource in the area through the network of permissive paths proposed to be created. Impacts to PRoWs have been considered throughout design development. It is of note that the</p>

			<p>characteristics of solar development are very different to ‘traditional’ forms of heavy industry and electricity generation and their ‘modular’ nature allows them to fit sympathetically within the existing landscape fabric.</p> <p>Furthermore, a Residential Visual Amenity Assessment (RVAA) has been undertaken considering potential impacts to dwellings in close proximity to the Order Limits <b>[APP-057]</b> which concludes that the Residential Visual Amenity Threshold is not broken for the Scheme.</p> <p>The Design and Access Statement <b>[APP-204]</b> sets out how the design of the proposed development has responded to its context, including the design principles which have informed the design.</p> <p>The Green Infrastructure Strategy Plan <b>[APP-173]</b>, Figure 6.11 of the LVIA , the Outline Landscape and Ecology Management Plan <b>[APP-210]</b> and the Work Plans <b>[APP-006]</b> illustrate the areas near to settlements proposed as Mitigation and Enhancement Areas and detail how the retained and new planting proposed will be managed.</p>
Access	PRoWs	The impact on recreation including walking, riding, cycling, and other pursuits is ill judged as to the sensitivity on key receptors. There is a complete lack of understanding of the impacts on peoples’ health and well-being, as existing and proposed permissive PRoWs are adjacent to and/or	The Design and Access Statement <b>[APP-204]</b> sets out how the design of the proposed development has responded to its context, including the design guidance applied to PRoW.

		<p>surrounded by solar arrays, associated electrical infrastructure, tracks and fencing.</p>	<p>All existing PRoW will be retained in their existing alignment. Whilst temporary closures may be needed during construction, no permanent closures are proposed.</p> <p>In addition, a total of 8.1km of new permissive paths form part of the proposed development, creating new routes to previously non-publicly accessible areas and improving wider PRoW network connectivity.</p> <p>An Amenity and Recreation Assessment was undertaken and is presented in the ES Chapter 6 Appendix 6.5 [APP-058] which concluded that whilst impacts to PRoW within the Solar PV Site during construction would be significant, operation impacts would not be significant following mitigation post 15 years when mitigation planting has matured. In relation to the two PRoWs within the Solar PV Site where this is not the case (Bridleways E169 and E182) offsets of at least 15m are proposed along with new planting so that overtime the impact on the recreational amenity of these routes will reduce (although still acknowledged to be significant in LVIA terms).</p>
Land and property	Site Selection	<p>There is no clear evidence of sequential testing and a fuller or sufficient review of the alternatives. The site and its layout was chosen primarily due to its proximity to the National Grid sub-station and has not fully considered the many negative impacts, as well as meeting all the planning guidelines.</p>	<p><b>Paragraphs 3.3.17-18</b> of the <b>Statement of Need [APP-202]</b> explain Government’s view that irradiance, site topography and proximity to suitable connection points to the transmission network, are likely to be key inputs to site selection. <b>Section 7.5</b> of the <b>Statement of Need</b> describes the site selection process for large-scale solar more fully.</p>

			<p>This is then built upon by the Site Selection Assessment (Appendix 1 to the Planning Statement) which explains how these factors, and other factors such as impacts to dwellings and agricultural land, have been applied specifically to the Scheme.</p> <p><b>Section 7.7</b> of the <b>Statement of Need</b> sets out how the design of the Proposed Development seeks to maximise utilisation of the grid connection capacity available at Ryhall Substation.</p>
Land Use and Soils	BMV land	National and local policy clearly state Best and Most Versatile (BMV) land should not be developed on in preference to lower grade land and brownfield land. The level of BMV land loss is completely unacceptable.	The agricultural land will not be lost. The great majority of the land will not be permanently affected as an agricultural resource by the installation of panels as part of the Proposed Development. An assessment of the areas affected by tracks, solar stations and the substation is set out in the ES Chapter 12 at Table 12-6 <b>[APP-114]</b> . The area extends to 14.4ha, of which 0.5ha is Grade 2 and 3.7ha is sub-grade 3a land within the Best and Most Versatile agricultural land definition.
Land Use and Soils	BMV land	There are irregularities in the sampling and assessment methodologies of the BMV Hypothesis, which renders the results as questionable.	No details are provided so a response is not possible. The ALC survey was carried out by highly skilled and experienced soil surveyors and is reported in the ES Appendix 12.4 REF
Statement of need	Land for mitigation	Mallard Pass has inappropriately secured farm more land than necessary to utilize the existing capacity at the Ryhall substation. Why was this necessary given the huge amount of site being left to mitigation rather than on-going food production.	<b>Section 7.7</b> of the <b>Statement of Need [APP-202]</b> sets out how the design of the Proposed Development seeks to maximise utilisation of the grid connection capacity available at Ryhall Substation. The requirements for mitigation and enhancements following the assessments undertaken have informed the land requirements for these uses.

Land Use and Soils	Loss of arable land	<p>Nationally there is much debate on this subject with competing demands for arable, livestock, environmental and regenerative schemes, biofuels etc. To have a balance argument the amount of energy generated needs to be balanced against the loss of food production and other implications. With an application that is not time limited, Mallard Pass can give no certainty or confidence when the land can return effectively to food production farming and its contribution to the National Grid.</p>	<p><b>Section 7.6</b> of the <b>Statement of Need [APP-202]</b> includes an analysis which concludes that the capacity of solar generation assets which could be installed on “brownfield” locations is unlikely to be sufficient to meet the UK’s Net-Zero needs. Therefore “greenfield” developments such as the Proposed Development are required to meet Net-Zero. <b>Section 7.6</b> continues with an analysis which shows that large-scale solar is the most efficient use of land for energy purposes.</p> <p>The Government has been clear that large scale deployment of solar is required. Consideration of the food production and economic implications of the use of the BMV land for the Proposed Development compared to the production from poorer quality land are set out in the ES at sections 12.4.83 and Table 12-11 <b>[APP-114]</b>. In short, the Applicant considers that the Scheme poses no impact or risk to food security.</p>
Land Use and Soils	Loss of arable land	<p>It is not realistic to assume that a site of this scale and layout can be managed for ongoing food production during operation. Baseline assumptions and a clearer plan taking account of likely worst case scenario needs to be clarified.</p>	<p>The land under the panels will be available for the grazing of sheep. Chapter 12 of the ES is clear as to the assumptions made in this respect as part of the assessment.</p>
Planning Statement	Consenting Strategy	<p>Planning consent is not time limited. This has considerable implications for the assumptions laid out in the application and across many of the metrics. Surely the efficacy of the application and the metrics provided can only be validated if the application has a time limit. How can this application meaningfully now be classed as temporary?</p>	<p>The Planning Statement <b>[APP-203]</b> addressed project lifetime in paragraphs 5.3.27 to 5.3.33.</p> <p>This confirms that the Applicant is not seeking a time limited consent, as the ES has not identified any specific project impact which would require the development to be linked to a specific operational timeframe. However, as noted in NPS EN-3, it is recognised that solar panel efficiency deteriorates over time and the electrical infrastructure will have</p>

			<p>an operational lifespan, after which it will need to be replaced or removed.</p> <p>The Applicant is not however proposing a systematic repowering or wholesale replacement of PV modules or of other infrastructure across the Order limits, beyond routine servicing and maintenance and therefore while a time limited consent is not sought, it is anticipated that the development will be decommissioned at some point in the future.</p> <p>Whilst the EIA has assessed the operational impacts of the Proposed Scheme as permanent, it is the case that any impacts caused by the proposed development related to the use of the land are considered to be reversible, pursuant to the management plans secured by the DCO application.</p>
Noise/Vibration	Impact on PRow	There is concern that riders' safety may be impacted by noise emitted from nearby solar stations, made worse by wind travel, and not fully taken into account in the assessment.	<p>The Environmental Statement has assessed the construction, operational and decommissioning noise impacts of the Proposed Development in the Noise and Vibration Chapter <b>[APP-040]</b>.</p> <p>Noise from electrical plant on PRowS is not expected to be at high level (below 55 dB L<sub>Aeq</sub>) and is relatively constant in nature so significant disturbance for animals such as horses is considered unlikely. This was based on a worst-case assessment assuming noisiest operation of each solar station, and favourable propagation conditions (which means the receptors would be downwind from the sources).</p> <p>Design Guidance within the Design and Access Statement [APP-204] stipulates that no solar stations should be within 250m of a PRow.</p>

Other Environmental Impacts	Glint and Glare impact	Glint and Glare – this has not been sufficiently addressed, especially with respect to cyclists and riders on some roads and bridleways and is a safety concern.	<p>A Glint and Glare Assessment is provided at Appendix 15.3 of the ES, which assesses the likely impacts of the development upon receptors <b>[APP-0104]</b>.</p> <p>The assessment concludes that screening in the form of existing vegetation and proposed screening is predicted to significantly obstruct all views of the reflecting panels from roads (a conclusion which will also apply to bridleways), as such no significant effects are likely.</p>
Ecology and Biodiversity	Impact on habitats + research methodology	The limitations of the survey date, emphasis on desk work, and overall methodology underplay the extent of the number of species and habitats in the area, and the potential impacts to them through different phases of the scheme. Where is the data/research to validate the scale impacts on biodiversity of such a large solar farm.	Chapter 7: Ecology and Biodiversity, of the ES <b>[APP - 037]</b> , presents the approach and findings of the assessment of potential impacts on Ecology and Biodiversity. The ecological and biodiversity assessment follows the general approach to undertaking EIA as explained in Chapter 2 of the ES, albeit it has been modified to take account of the main guidance document used when assessing impacts on ecological features, which is the Ecological Impact Assessment (EclA) guidance published by the Chartered Institute for Ecology and Environmental Manage. This was based on surveys carried out to industry standards.
Construction	Impact of construction	The impacts of installing over ½ million solar panels, a new sub-station and all the associated infrastructure are disproportionate, the local environment and community will be too adversely affected by the scale of this project.	<p>The Environmental Statement has assessed the effects the construction, operational and decommissioning impacts of the Proposed Development for the following environmental topics:</p> <ul style="list-style-type: none"> <li>• Landscape and Visual <b>[APP-036]</b></li> <li>• Ecology and Biodiversity <b>[APP-037]</b></li> <li>• Cultural Heritage <b>[APP-038]</b></li> <li>• Highways and Access <b>[APP-039]</b></li> <li>• Noise and Vibration <b>[APP-040]</b></li> </ul>



			<ul style="list-style-type: none"><li>• Water Resources and Ground Conditions <b>[APP-041]</b></li><li>• Land Use and Soils <b>[APP-042]</b></li><li>• Climate Change <b>[APP-043]</b></li><li>• Socio-Economics <b>[APP-044]</b></li><li>• Other Environmental Topics including Air Quality, Arboriculture, Glint and Glare, Major Accidents and/or Disasters, Utilities and Waste) <b>[APP-045]</b>.</li></ul> <p>The Planning Inspectorate was consulted regarding the scope of Environmental Impact Assessment through an EIA Scoping Opinion Request <b>[APP-049]</b>. The Planning Inspectorate provided an EIA Scoping Opinion <b>[APP-050]</b> and the Environmental Statement is based upon this Scoping Opinion. The Scoping Opinion Matrix <b>[APP-051]</b> sets out how the ES accords with the EIA Scoping Opinion.</p> <p>The environmental assessments identified the need for mitigation measures to be incorporated within the Proposed Development. These mitigation measures are secured through the requirements set out within the draft DCO and are secured through the following documents:</p> <ul style="list-style-type: none"><li>• Design Guidance set out within the Design and Access Statement <b>[APP-204]</b>,</li><li>• Access and Rights of Way Plans <b>[APP-011]</b>,</li><li>• Outline construction environmental management plan <b>[APP-207]</b>,</li><li>• Outline operational environmental management plan <b>[APP-208]</b></li><li>• Outline construction traffic management plan <b>[APP-212]</b>,</li><li>• Outline travel plan <b>[APP-215]</b>,</li></ul>
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			<ul style="list-style-type: none"> <li>• Outline decommissioning environmental management plan <b>[APP-209]</b>,</li> <li>• Outline excavated materials management plan <b>[APP-213]</b>,</li> <li>• Outline landscape and ecology management plan <b>[APP-210]</b>,</li> <li>• Outline employment skills and supply chain plan <b>[APP-211]</b>,</li> <li>• Outline soil management plan <b>[APP-213]</b></li> <li>• Outline surface water drainage strategy <b>[APP-087]</b>,</li> <li>• Outline water management plan <b>[APP-214]</b>,</li> <li>• Traffic regulation measures plans – road closures <b>[APP-014]</b>,</li> <li>• Traffic regulation measures plans – temporary measures <b>[APP-015]</b> and</li> <li>• Works Plans <b>[ASS-003]</b></li> </ul> <p>Chapter 17 summarises the residual effects of the Scheme, of which there are few.</p>
Management Plans	Decommissioning	The draft DCO does not thoroughly consider decommissioning to ensure the land can be returned fully to its former state.	The Solar PV Site would be reinstated in accordance with a Decommissioning Environmental Management Plan (DEMP). The DEMP will be required to be in accordance with the outline Decommissioning Environmental Management Plan (oDEMP) <b>[APP-029]</b> which has been prepared to support the DCO Application. The DEMP will be subject to the approval of the local planning authorities. The decommissioning would include the removal of any permissive paths and potential reversion of grassland underneath the PV Arrays. Any landscape structural planting, such as tree planting, hedgerows, scrub etc created to deliver biodiversity mitigation and

			enhancement associated with the Proposed Development would be left in-situ when the Site is handed back to landowners. The DEMP also commits the Applicant to repair any damage to agricultural drains that has occurred during the operation of the Proposed Development.
Climate Change	Lack of research	Carbon impact. The assumptions do not take into account all of the variables and worst case scenario given the unlimited time of the application. The figures are therefore open to interpretation and there is no clear guaranteed contribution to Net Zero.	Solar is a low-carbon electricity generation technology. <b>Figure 7.3</b> of the <b>Statement of Need [APP-202]</b> shows the cumulative carbon emissions saved by solar generation versus the case that the electricity generated by solar was instead generated by Combined Cycle Gas Turbines (which emit carbon at a rate of 394 gCO <sub>2</sub> /kWh). The IPCC estimate of lifetime emissions of 48 kgCO <sub>2</sub> eq/MWh for utility scale solar generation (based on the median value from a range of 8 to 180 kgCO <sub>2</sub> e/MWh), includes embedded emissions in materials and the construction phase.. <b>Figure 7.3</b> shows that carbon emissions from electricity generation would be higher if solar developments did not come forwards at the rate that National Grid project is required, than they would be if solar development follows National Grid's projections.
Water Resources and Ground Conditions	Flood Risk	The application does not properly consider the effects of off-site flooding exacerbated by the construction and operation of the solar farm. Evidence clearly shows the vulnerability of certain on and off-site areas. Climate change will add increasing pressures combined with the inevitable and irreversible effects on the soil of 2 years of construction.	A Flood Risk Assessment has been undertaken and can be found within Appendix 11.5 of the Environmental Statement <b>[APP-086]</b> alongside Appendix 11.6: Outline Surface Water Drainage Strategy of the ES <b>[APP-087]</b> which includes the management of surface water runoff rates for the Proposed Development. Both of these documents include allowances for climate change.

			<p>The Flood Risk Assessment states in Section 3 that the implementation of measures in the Outline Surface Water Drainage Strategy will prevent an increase in flood risk elsewhere.</p> <p>Table 1-1 Summary of Mitigation Measures within the Outline Water Management Plan <b>[APP-214]</b> details that measures to prevent compaction of soil during construction, such as avoiding tracking over soils when too wet, are detailed in and secured by the Outline Soil Management Plan <b>[APP-213]</b>. The potential effects of the Proposed Development on water resources and ground conditions are assessed in Chapter 11 of the ES <b>[APP-041]</b> and at paragraph 11.4.60 it assessed the effect on the compaction of soil during construction and decommission phases to be negligible.</p> <p>Table 2 of the Flood Risk Assessment <b>[APP-086]</b> concludes that the residual risk of the Proposed Development flooding from all sources is Negligible.</p>
Cultural Heritage	Impact on historic landscape	<p>The solar farm is on the doorstep of the historic market town of Stamford and a very short distance from Burghley House. Its presence will only undermine the rural and historic setting of the area. The Sunday Times voted Stamford ‘best place to live’ in Midlands region in 2021, best in UK in 2013 and 2nd place in 2017, these accolades have boosted local tourism over the last 10 years.</p>	<p>The Applicant acknowledges that there are various listed buildings lying within the historic centre of Stamford, within 5km of the Order limits. The effect of the Proposed Development changing the setting these heritage assets has been assessed and reported in Chapter 8: Cultural Heritage <b>[APP-038]</b> (and its associated appendices).</p> <p>While the Proposed Development will alter the current rural setting, it will not alter any elements that contribute to the significance of these assets, and no harm to their significance will occur as a</p>

			<p>result of the Proposed Development. No significant effects are therefore anticipated.</p> <p>With respect to Burghley House specifically, as explained in Chapter 8: Cultural Heritage <b>[APP-038]</b>, there are no meaningful historical associations or intervisibility between the Proposed Development and Burghley House that will be impacted by the construction and operation of the solar farm.</p> <p>For more detail see ES Appendix 8.4: Cultural Heritage Impact Assessment <b>[APP-068]</b>.</p> <p>The assessment of potential impacts on tourism during the construction, operation and decommissioning phases is undertaken as part of the socio-economics assessment provided in chapter 14 of the Environmental Statement <b>[APP-044]</b>. It concludes that, given the only adverse effects would be experienced by users of PRoW within and closest to the Order limits and that accommodation providers could potentially benefit from additional income from staying workers, it is considered that, on balance, the construction phase will have a negligible to minor adverse effect on tourism. It is also considered that the presence of the Proposed Development would only have a negligible to minor adverse effect on tourism during the operational phase, which is not significant.</p>
Socio-Economic Impacts	Impact on local businesses	Residents running nearby B&B or holiday lets will suffer a loss of business as no one wants to stay next or near to a solar farm, however attractive Stamford might seem to visit; disruption to local	<p>The assessment of potential impacts on tourism during the construction, operation and decommissioning phases is undertaken as part of the socio-economics assessment provided in chapter 14 of the Environmental Statement <b>[APP-044]</b>. It</p>

		businesses from the 2 year construction work will also be harmful.	concludes that, given the only adverse effects would be experienced by users of PRoW within and closest to the Order limits and that accommodation providers could potentially benefit from additional income from staying workers, it is considered that, on balance, the construction phase will have a negligible to minor adverse effect on tourism. It is also considered that the presence of the Proposed Development would only have a negligible to minor adverse effect on tourism during the operational phase, which is not significant.
Local Communities	Lack of direct benefits	There are no discernible local benefits to this scheme, only harm to the local community. There are 8 villages adjacent to the site and at least 20 in total that will be negatively affected in some way; locals were led to assume their energy would be cheaper and the development might power up to 92,000 local homes, an incentive perhaps for people to get behind the scheme. Neither is the case. Market pricing is dictated by global gas wholesale prices not local energy generation, and the energy generated goes directly to the National Grid.	<p>The Applicant sought to include benefits to the local community from the inception of the Project and has taken a design-led approach to the overall masterplan, including substantial Green Infrastructure commitments from an early date, including opening up of pedestrian walkways along a new river corridor on the West Glen River. This approach is set out in the Design and Access Statement <b>[APP-204]</b>. This approach to ensuring good design in infrastructure developments is also a policy requirement in NPS EN1 (section 4.5).</p> <p>The Proposed Development will be sensitively sited and offset from residential properties through 50m offsets for solar stations from PRoWs and 250m offset of solar stations from residential properties All existing PRoWs will be retained in their existing alignment and complemented by a total of 8.1km of new permissive paths that link to wider network and creating joined up routes. There will be a 15m offset from PRoWs to the edge of the Solar PV Site with appropriate screening planting to manage the</p>

			<p>amenity of PRoWs. The Proposed Development will create opportunities for people to engage with the natural world in the form of nature areas, viewing hides and interpretation boards.</p> <p>Whilst not a direct local benefit, there is benefit to all UK citizens from the UK producing more clean, renewable electricity, in terms of affordability and energy security and resilience. This is considered further in the Statement of Need <b>[APP-202]</b>.</p>
General	Key statistics presentation	There is an inconsistency in the presentation of some of the key statistics in the application which needs to be reviewed to ensure none of the key messages are misleading or misrepresentative.	The Applicant is confident that its application material is robust, and is unable to respond to this statement without further specifics.
Traffic and Transport	Impacts underestimated	The traffic impacts have not been fully assessed or updated in the light of changes during the pre-application to final application stages, and as such the significance of the impacts have been underestimated causing significant disruption, damage and harm to the local area and communities.	<p>The construction traffic impact assessment is set out in <b>ES Chapter 9 Highways and Access [APP-039]</b></p> <p>The methodology for the assessment of effects is based on the 'Guidelines for the Environmental Assessment of Road Traffic' (GEART), produced by the Institute of Environmental Assessment (IEA) (now the Institute of Environmental Management and Assessment (IEMA)) 1993).</p> <p>The assessment identified that the Proposed Development will result in a negligible increase in traffic on the majority of the local network, with less than a 2% increase in the daily vehicle flows. Where there is a greater impact on Uffington Lane, mitigation is proposed in the form of passing places and widening at the junction with the A6121.</p>

			The assessments within the ES conclude that the highway and access effects would be negligible.
Cumulative Impacts	Health and well-being	The combined impacts on daily life to recreation, visual, residential, and socio-economic elements as a result of the construction activities, operational noise, new industrial landscape, increased flood risk, will serve to create mounting stress and upset within the local communities.	<p>The Environmental Statement has assessed the effects the construction, operational and decommissioning impacts of the Proposed Development for the following environmental topics:</p> <ul style="list-style-type: none"> <li>• Landscape and Visual <b>[APP-036]</b></li> <li>• Ecology and Biodiversity <b>[APP-037]</b></li> <li>• Cultural Heritage <b>[APP-038]</b></li> <li>• Highways and Access <b>[APP-039]</b></li> <li>• Noise and Vibration <b>[APP-040]</b></li> <li>• Water Resources and Ground Conditions <b>[APP-041]</b></li> <li>• Land Use and Soils <b>[APP-042]</b></li> <li>• Climate Change <b>[APP-043]</b></li> <li>• Socio-Economics <b>[APP-044]</b></li> <li>• Other Environmental Topics including Air Quality, Arboriculture, Glint and Glare, Major Accidents and/or Disasters, Utilities and Waste) <b>[APP-045]</b>.</li> </ul> <p>The landscape assessment concludes that only limited localised residual significant effects will arise as landscape planting will screen sensitive views.</p> <p>The Flood Risk Assessment identifies that the installation of PV Arrays and establishment of grass underneath the PV Arrays does not have the potential to significantly increase surface water runoff rates compared to the baseline scenario. An Outline Surface Water Management Strategy is provided in Appendix 11.6 of the ES which outlines</p>



			<p>the surface water management measures to be implemented at the Proposed Development.</p> <p>The socio-economics assessment considers that the adverse effects on PRow users and beneficial effects on tourism would, on balance, have a negligible to minor adverse effect on the study area tourism economy, which is not significant.</p> <p>A Residential Visual Amenity Assessment (RVAA) has been undertaken considering potential impacts to dwellings in close proximity to the site <b>[APP-057]</b> which concludes that the Residential Visual Amenity Threshold is not exceeded.</p> <p>The noise assessment concludes that no significant adverse effects are expected in relation to traffic or operational plant.</p>
Statement of need	Lack of comparison between project and national needs	The measures of any such project should be what it delivers in totality. Whilst the need for energy is articulated, it is not matched with any detail on what it will deliver against the national need over what period of time. No business plan would (or should) be accepted based on such vague headline numbers.	<p><b>Figure 7.2</b> of the <b>Statement of Need [APP-202]</b> shows that National Grid's projections of solar installed capacity in Net-Zero compliant future energy scenarios reach between 57 and 92GW by 2050.</p> <p>The grid connection capacity available at Ryhall substation, and which the Proposed Development is designed to make the best use of, is 240MW (<b>Statement of Need Paragraph 4.7.12</b>). The Proposed Development will therefore contribute 0.2% - 0.3% of the total projected need for UK solar in 27 years time. This statistic starkly illustrates the</p>

			fact that many more large-scale solar developments – like the Proposed Development – are needed in the UK and therefore all similar projects, including the Proposed Development, have essential roles to play in the fight against climate change.
General	Security Issues	There is some concern that a national infrastructure project should consider all security issues with respect to sourcing, project management and funding.	These matters are able to be considered by the Government in regulating the Applicant and in the examination of the submitted Funding Statement during Examination.
Cumulative Impacts	Lack of assessment of other projects	There has been a failure to properly assess and mitigate the cumulative impact of the scheme alongside other planned local infrastructure projects. There are plans for substantial house building projects in the area which will use similar traffic routes as well as other solar projects.	There are no relevant existing or approved developments to consider in relation to the cumulative effects from the Proposed Development in relation to traffic due to the limited overlap in construction programme and construction vehicle routing. In any case the traffic from these developments is already factored into the TEMPRO growth analysis of the Base 2026 model. The cumulative assessment in chapter 16 of the ES <b>[APP-046]</b> considers other projects, as relevant.

**Stamford, Bourne and The Deepings Rambler Group (RR-1082)**

Topic	Theme	Statutory Consultee Comment	MPSF Response
Access	PRoWs	<p>The addition of five miles of extra permissive paths will not compensate for the losses made by building this huge solar farm. Our walkers would not walk in this area if the solar farm is built. We will be driving our cars to areas of natural beauty, unspoiled by solar panels.</p>	<p>The Design and Access Statement [APP-204] sets out in detail how the design of the Proposed Development has responded to its context, including the Design Guidance applied to PRoW to minimise impacts to users of these routes.</p> <p>All existing PRoW will be retained in their existing alignment. Whilst temporary closures may be needed during construction, no permanent closures are proposed.</p> <p>In additional, a total of 8.1km (5 miles) of new permissive paths is proposed as part of the proposed development, creating new routes to previously non-publicly accessible areas and improving wider PRoW network connectivity.</p> <p>An Amenity and Recreation Assessment was undertaken and is presented in the ES Chapter 6 Appendix 6.5 [APP-058] which concluded that whilst impacts to PRoW within the site during construction would be significant, operation impacts would not be significant post year 15 following mitigation post 15 years when mitigation planting has matured. In relation to the two PRoWs within the Solar PV Site where this is not the case (Bridleways E169 and E182) offsets of at least 15m are proposed along with new planting so that overtime the impact on the recreational amenity of these routes will reduce</p>

			(although still acknowledged to be significant in LVIA terms).
Size and Scale	Impact on landscape character	<p>It is too large - The sheer scale of the solar farm 1,052 acres means it is impossible to mitigate the impacts on the landscape character. Much of the countryside is lightly undulating and solar panels of 3.3m high will completely change the landscape character to a more industrial environment of 2,105 acres. It is impossible to discreetly screen a solar farm of this size and doing so where there are supposed to be expansive views would not be the right thing to do.</p>	<p><b>Chapter 12</b> of the <b>Statement of Need [APP-202]</b> concludes that “Large-scale solar generation is essential to support the urgent decarbonisation of the GB electricity sector” and <b>Section 7.5</b> describes that the local area is “highly suitable location for large-scale solar” and therefore is likely to attract large-scale solar projects to the area and that these projects will be essential for the decarbonisation of the UK electricity sector. As NPS EN-1 recognises, some visual impacts are likely to occur as a result of new energy infrastructure which seeks to meet the UK’s urgent needs. In light of the connection to Ryhall Substation, the Scheme, as explained in the DAS <b>[APP-204]</b> and through the measures set out in the Green Infrastructure Strategy <b>[APP-173]</b> has been sensitively designed to minimise impacts to the surroundings.</p> <p>The potential impacts to the landscape and visual resource has been comprehensively assessed in accordance with best practice guidance and informed by consultation with stakeholders. The results of this assessment are set out in detail within the LVIA <b>[APP-036]</b>.</p> <p>To support the LVIA photomontages have been produced for year 1 and year 15 scenarios.</p> <p>The Design and Access Statement <b>[APP-204]</b> sets out how the design of the Proposed Development has responded to its context, including the Design Principles which have informed the design.</p>

Construction	Impact of construction on PRoWs	Closure of PRoWs at various times during construction could be disruptive. Walkers may be forced onto the road in some places which will inevitably be busier with construction traffic and therefore more dangerous.	<p>The Design and Access Statement <b>[APP-204]</b> sets out how the design of the proposed development has responded to its context, including the design guidance applied to PRoW.</p> <p>All existing PRoW will be retained in their existing alignment. Whilst temporary closures may be needed during construction, no permanent closures are proposed.</p> <p>An Amenity and Recreation Assessment was undertaken and is presented in the ES Chapter 6 Appendix 6.5 <b>[APP-058]</b> which concluded that whilst impacts to PRoW within the site during construction would be significant, operation impacts would not be significant following mitigation post year 15.</p> <p>Any temporary changes to the PRoW would be agreed with RCC and LCC, and suitably mitigated through appropriate diversions in accordance with the measures set out within the oCEMP <b>[APP-207]</b> and OCTMP <b>[APP-212]</b>.</p>
Ecology and Biodiversity	Impact on the flora and fauna	This project will impact habitats and wildlife corridors will be disrupted by the two-year construction phase. The extensive fencing of the solar areas on the site will disrupt the patterns of the flora and fauna which flies in the face of conservationist campaigns. Are we preserving our environment with this project or destroying it? Is this a green project? No.	<p>Embedded mitigation measures include the details set out in the outline Construction and Environmental Management Plan (oCEMP) <b>[APP-207]</b>, outline Decommissioning and Environmental Management Plan (oDEMP) <b>[APP-209]</b> and outline Landscape and Ecological Management Plan (oLEMP) <b>[APP-210]</b>. These documents have been prepared and include mitigation measures which are intended to avoid the risks of effects during the construction and decommissioning phases, such as indirect and direct</p>

			<p>damage to retained features, direct damage to active bird nests and injury to protected species or damage to the habitat of those species.</p> <p>The assessment of potential effects takes these measures into account. This has concluded that there will not be any significant impacts to any ecological feature.</p>
Land Use and Soil	Food Security	The War in Ukraine has brought into sharp focus the essential need to feed one's population. Future food security is essential.	Noted. The Applicant does not consider that the Scheme poses any risk to the UK's food security now and in the future.
Land Use and Soil	Loss of arable land	To use valuable agricultural land to house solar panels is non-sensical. A land loss of productive agricultural acreage is a bad decision. Solar panels could be placed on the rooftops of newbuilds: new build housing; the huge factory and warehouse rooves which are springing up everywhere plus the adaptations to existing south-facing buildings.	<p><b>Section 7.6</b> of the <b>Statement of Need [APP-202]</b> analyses the potential contribution of "brownfield" solar sites to the national need for solar generation. Brownfield sites, including rooftop and other community energy systems, are likely to grow in the UK and will make a contribution to decarbonisation of the UK energy system. However, the Statement of Need concludes that on their own, brownfield developments are unlikely to be able to meet the national need for solar. <b>Section 8.5</b> of the <b>Statement of Need</b> describes and agrees with Government's view that decentralised and community energy systems are unlikely to lead to the significant replacement of large-scale infrastructure. It is the Applicant's view (and this aligns with Government's view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p>

**Rutland Local History and Record Society (RR-1017)**

Topic	Theme	Statutory Consultee Comment	MPSF Response
Cultural Heritage	Impact on heritage assets	The extensive geographical nature of the proposal is highly likely to have impacts on the significance of heritage assets, and whilst information has been provided by the applicant the society wishes to have the opportunity at examination of exploring the extent and nature of the proposed approach to heritage matters.	<p>The effect of the Proposed Development changing the setting(s) of designated (and non-designated) heritage assets has been assessed and reported in Chapter 8: Cultural Heritage [APP-038] (and its associated appendices).</p> <p>While the Proposed Development will alter the current rural setting, of Listed Buildings and Conservation Areas, at Ryhall, Braceborough, Uffington, Little Casterton and Great Casterton, and Essendine, it will not alter any elements that contribute to the significance of assets at these locations, and no harm to their significance will occur as a result of the Proposed Development. No significant effects are therefore anticipated.</p>
Cultural Heritage	Impact on heritage assets	Extensive parts of the eastern area of Rutland could be impacted by the proposals - especially the villages and agricultural / countryside environs of Belmesthorpe, Ryhall, Essendine, and Pickworth. Much of this area will contain identified historical features already recorded in the HER, but there is also significant potential for new finds to be discovered (eg which may be of importance commensurate with the recently discovered Rutland Roman Villa complex).	<p>For more detail see ES Appendix 8.4: Cultural Heritage Impact Assessment [APP-068].</p>
Cultural Heritage	Archaeological impacts and impact on heritage assets	<p>The key issues for the Society to consider and comment upon further include:</p> <ul style="list-style-type: none"> <li>- Reviewing and addressing potential archaeological impacts;</li> <li>- Impacts on parish boundaries and historical field boundaries;</li> <li>- Impacts on heritage assets – direct or in terms of landscape/visual impacts and wider views/cumulatively, settings of villages/conservation areas/listed buildings.</li> </ul>	<p>Noted. The Applicant will respond to any further comments made by the Society when these are submitted to the examination.</p> <p>In response to the key issues raised by the Society:</p> <ul style="list-style-type: none"> <li>• the potential impacts on buried archaeological remains (utilising desk-based sources and field surveys) has been assessed by the Applicant. This is presented within Chapter 8: Cultural Heritage [APP-038] and its associated appendices.</li> </ul>

			<ul style="list-style-type: none"><li>• An assessment of historic field boundaries (hedgerows) is included within Appendix 8.4 of Chapter 8: Cultural Heritage <b>[APP-038]</b> paragraphs 3.74 to 3.119 (specifically Figure 23).</li></ul> <p>The potential effects on the settings of Conservation Areas, Listed Buildings and other non-designated heritage assets are detailed within Chapter 8: Cultural Heritage <b>[APP-038]</b>, (summarised at paragraphs 8.4.8 to 8.4.11 and in detail with Appendix 8.4). In terms of the issues identified, the effect of the Proposed Development changing the setting(s) of designated (and non-designated) heritage assets and the impacts on buried archaeological remains has been assessed and reported in Chapter 8: Cultural Heritage <b>[APP-038]</b> (and its associated appendices).</p> <p>No significant or material effects are anticipated, as the nature of the Proposed Development is such that its construction, operation and decommissioning will result in minimal ground disturbance.</p> <p>The Applicant is proposing a suite of mitigation measures that will be able to be employed at the detailed design phase to enable buried archaeological remains (that are specifically sensitive) to be protected from any form of disturbance. These include localised use of 'no-dig' construction solutions to avoid piling, and/or avoiding installation of PV Arrays altogether in certain localised areas. These measures are set out in more detail in the oCEMP <b>[APP-207]</b>.</p>
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			In terms of heritage assets that are above ground, the Proposed Development will alter the current rural setting but it will not alter any elements that contribute to the significance of these assets, and no harm to their significance will occur as a result of the Proposed Development. For more detail see ES Appendix 8.4: Cultural Heritage Impact Assessment [APP-068].
Cultural Heritage	Impact on heritage assets	The Society may, for example, wish to underline the opportunity for the proposals (if approved) to resource properly scoped archaeological work, field walking, recording, interpreting the historic landscape, protection measures etc - which may include an ongoing role for the Society working with other bona-fide history groups, professionals, volunteers, schools and young archaeologists groups.	Noted. The Applicant welcomes the opportunity to work alongside the Society in all possible future phases of archaeological investigations.

**Leicestershire and Rutland Area Ramblers (RR-0627)**

Topic	Theme	Statutory Consultee Comment	MPSF Response
Size and Scale	Location/Size of proposed development	<p>As a responsible body, the Ramblers supports measures to mitigate this threat by switching to renewable resources of energy - including the use of photovoltaic technology - where appropriate. However, it is our view that the Mallard Pass Solar Farm proposal is certainly not appropriate for this part of Rutland and South Lincolnshire, and we wish to make a strong objection.</p>	<p><b>Section 8.5 of the Statement of Need [APP-202]</b> describes and agrees with Government’s view that decentralised and community energy systems are unlikely to lead to the significant replacement of large-scale infrastructure. It is the Applicant’s view (and this aligns with Government’s view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p> <p>As discussed in section 8.5 <b>Statement of Need [APP-202]</b>, which concludes that the development of large sites (which connect to the transmission network) is essential in order to connect the scale of new capacity required to meet Net Zero requirements. On this basis, the emphasis should be on maximising the use of available capacity at grid connections where they occur. Consideration was therefore given to areas in the UK where grid connections were available and that were suitable for solar development. The Site Selection Report, at Annex 1 of the Planning Statement [APP-203] further explains the process undertaken for Site selection for the Scheme.</p> <p><b>Section 8 of the Planning Statement [APP-203]</b> concludes with a consideration of the Planning Balance and justifies how the overwhelming national need, as demonstrated in the <b>Statement of Need [APP-202]</b> outweighs any potential significant adverse impacts which, as the <b>Environmental Statement [APP-047]</b> sets out, are limited.</p>

<p>Landscape and Visual</p>	<p>Visual impact on landscape and PRow</p>	<p>If allowed to proceed, this development will spoil the public's enjoyment of a large swathe of open countryside. Even with mitigation measures, its sheer size and scale will seriously compromise the visual appeal of this rural landscape for all those who use its network of footpaths and bridleways.</p>	<p>The potential impacts to the landscape and visual resource has been comprehensively assessed in accordance with best practice guidance and informed by consultation with stakeholders.</p> <p>The results of this assessment are set out in detail within the LVIA <b>[APP-036]</b>.</p> <p>To support the LVIA, a number of photomontages have been produced for year 1 and 15 to allow for the growth planting to provide additional visual screening.</p> <p>Furthermore, an Amenity and Recreation Assessment was undertaken and is presented in the ES Chapter 6 Appendix 6.5 <b>[APP-058]</b> which concluded that whilst impacts to PRow within the site during construction would be significant, operation impacts would not be significant following mitigation post year 15 save for at Bridleways E169 and E182 due to their location within the solar farm, but where the Applicant has set off the developable are to seek to minimise such impacts.</p> <p>The Design and Access Statement <b>[APP-204]</b> sets how the design of the Proposed Development has responded to its context, including the Design Principles which have informed the design.</p> <p>All existing PRow will be retained in their existing alignment. Whilst temporary closures may be needed during construction, no permanent closures are proposed.</p>
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			<p>In addition, a total of 8.1km of new permissive paths form part of the proposed development, creating new routes to previously non-publicly accessible areas and improving wider PRoW network connectivity.</p>
Access	PRoW	<p>There are at least four PRoW that will pass through or run alongside the proposed Solar Farm, making up several kilometres of footpaths and bridleways in total. This includes a section of the Macmillan Way, one of the region's prestigious National Trails.</p>	<p>The Design and Access Statement <b>[APP-204]</b> sets out how the design of the Proposed Development has responded to its context, including the Design Guidance applied to PRoW.</p> <p>All existing PRoW will be retained in their existing alignment. Whilst temporary closures may be needed during construction, no permanent closures are proposed.</p> <p>In addition, a total of 8.1km of new permissive paths form part of the proposed development, creating new routes to previously non-publicly accessible areas and improving wider PRoW network connectivity.</p> <p>An Amenity and Recreation and Amenity assessment was undertaken and is presented in the ES Chapter 6 Appendix 6.5 <b>[APP-058]</b> which concluded that whilst impacts to PRoW within the site during construction would be significant, operation impacts would not be significant following mitigation post 15 years when mitigation planting has matured. In relation to the two PRoWs within the Solar PV Site where this is not the case (Bridleways E169 and E182) offsets of at least 15m are proposed along with new planting so that overtime the impact on the recreational amenity of these routes will reduce (although still acknowledged to be significant in LVIA terms).</p>

			<p>The Macmillan Way is a long distance path and not a National Trail (such as the Pennine Way or Cotswold Way). It has been assessed within the Amenity and Recreation Assessment [APP-058] which concludes <b>impacts to it would be no more than slight adverse, reducing to minimal post year 15.</b></p>
Construction	Impact of Construction	<p>The construction phase alone, estimated to take at least two years, is going to create some significant problems in terms of access and recreation, with path closures/diversions necessary for long periods, and the constant presence across the site of works traffic and machinery noise. The developers admit that the "... construction phase is likely to have an adverse, local, temporary and medium-term impact on the severance of non-motorised users of the ... PROW network" (Environmental Statement/Highways &amp; Access/9.6.9).</p>	<p>Construction of the Proposed Development will be phased across the Order limits so construction effects will not occur over a two year period at individual receptor locations.</p> <p>Access to all existing PROW will be retained during the construction phase, with a limited number of temporary PROW diversions to allow the construction of access tracks where they cross PROW. The PROW will be managed throughout the construction phase to ensure that they can continue to be used safely. It is important that public safety is maintained when there are moving vehicles along the construction routes within the Order limits. The proposed construction routes through the Order limits will be physically separated from existing PROW, where possible, using perimeter fencing in the first instance or mesh, heras, or other similar types of fencing for a temporary period during construction, to maximise the safety of users. The existing PROW will be reinstated when construction has been completed for that particular phase, albeit public access will be retained throughout as a result of the PROW diversions. The minimum legal PROW widths will be maintained for all PROW throughout the construction phase. These measures</p>

			are set out in and secured by the Outline construction environmental management plan <b>[APP-207]</b> .
Landscape and Visual	Visual impact on landscape and PRow	Once completed, and in mitigation, the hundreds of hectares of solar panels, with associated security fencing and inverters, are, apparently, to be screened eventually with hedging to reduce the negative visual effects. However, it will be several years before that hedging is of sufficient height to provide even adequate screening, and, again as the developers admit, the huge array of panels will still be visible from some points along the affected paths.	<p>The potential impacts to the landscape and visual resource has been comprehensively assessed in accordance with best practice guidance and informed by consultation with stakeholders. The results of this assessment are set out in detail within the LVIA in Chapter 6 of the Environmental Statement <b>[APP-036]</b>.</p> <p>Mitigation in the form of woodland and hedgerows has been proposed at a number of key locations to provide additional visual screening but it is acknowledged that there would be an intervening period in which the solar panels would be more visible between operation year 1 and 15 – but this position will steadily improve.</p> <p>The Design and Access Statement <b>[APP-204]</b> sets out how the design of the proposed development has responded to its context, including the design guidance applied to PRow.</p>
Landscape and Visual	Visual impact on landscape and PRow	In summary, the traditional character of this gently undulating and open landscape, offering expansive views across largely arable fields, will be changed for the worse if this proposal succeeds - to the detriment of all those who enjoy using the existing public paths.	There is often a disparity of opinion and public attitudes towards renewable energy development from adverse to positive. Third party representations often refer to ‘the industrial character of a solar farm’. Whilst some local objectors might view a solar farm in this way, equally, other people would simply view solar farms as essential infrastructure that should be

			<p>delivered as a matter of urgency to tackle climate change.</p> <p>The Applicant has in its Site Selection Assessment <b>[APP-203]</b>, explained how the site came to be chosen; and in the Design and Access Statement <b>[APP-204]</b>, how the Scheme design has evolved to minimise impacts.</p> <p>The Scheme will maximise an available grid connection to deliver a substantial amount of renewable energy – as NPS EN-1 recognises, visual impacts are a likely consequence of such infrastructure being delivered, but notwithstanding this, the Scheme has sought to react to its surroundings, including PRowS and deliver a design with limited significant impacts.</p> <p>The character and appearance of the Order limits would change from arable farmland to a utility-scale solar PV development. However, due to landform and the framework of woodlands, treebelts and hedgerows proposed, the Solar PV Site would appear subdivided and compartmentalised. It is of note that the characteristics of solar development are very different to ‘traditional’ forms of electricity generation and their ‘modular’ nature allows them to fit sympathetically within the existing landscape fabric.</p>
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**Peterborough Ramblers (RR-0920)**

Topic	Theme	Statutory Consultee Comment	MPSF Response
Ecology and Biodiversity	Ecology surveys	We are very disappointed that the so called environmental studies have been for only a few months - there is no way you will fully understand the annual and season and long term issues that you will impact over such a short period of study.	Chapter 7: Ecology and Biodiversity, of the ES [APP-037], presents the approach and findings of the assessment of potential impacts on Ecology and Biodiversity. The ecological and biodiversity assessment follows the general approach to undertaking EIA as explained in Chapter 2 of the ES, albeit it has been modified to take account of the main guidance document used when assessing impacts on ecological features, which is the Ecological Impact Assessment (EclA) guidance published by the Chartered Institute for Ecology and Environmental Manage. This was based on surveys carried out to industry standards, including in respect of the survey effort of such surveys.
Landscape and Visual	Impact on the wider landscape	We are against using unspoilt, productive farming and wooded landscape to put sheets of plastic in? Why not look for brown field sites? The proximity to a sub-station should not be the only deciding factor in placing these panels in otherwise productive farmland.	<b>Section 7.6 of the Statement of Need [APP-202]</b> analyses the potential contribution of “brownfield” solar sites to the national need for solar generation. Brownfield sites, including rooftop and other community energy systems, are likely to grow in the UK and will make a contribution to decarbonisation of the UK energy system. However the <b>Statement of Need</b> concludes that on their own, brownfield developments are unlikely to be able to meet the national need for solar.



			<p><b>Paragraphs 3.3.17-18</b> of the <b>Statement of Need [APP-202]</b> explains Government’s view that irradiance, site topography and proximity to suitable connection points to the transmission network, are likely to be key inputs to site selection. <b>Section 7.5</b> of the <b>Statement of Need</b> describes the site selection process for large-scale solar more fully.</p> <p>A Site Selection report is appended to the <b>Planning Statement [APP-203]</b> which provides an overview of the site selection process undertaken by the Applicant to identify the location of the Proposed Development, and further analysis on the evolution of the design of the Proposed Development can be found in the <b>Environmental Statement Chapter 4: Alternatives and Design Development [APP-048]</b>.</p>
Cultural Heritage	Archaeology and local heritage	Creating a single physical development with an exclusion zone in the middle of the open countryside which has several footpaths and places of interest and local heritage is a high price for the local communities to pay. These assets have little or no financial value so the developers are threatening to lay waste to them all. If we are seeking green energy for the betterment of the environment then please do not spoil the environment in so doing. The irony is too important to ignore!	<p>The Site Selection Assessment is appended to the <b>Planning Statement [APP-203]</b> and explains how the site was selected.</p> <p>The <b>Design and Access Statement [APP-204]</b> explains how the Scheme design has evolved to account for the surrounding environment, including PRowS and heritage assets. The Applicant does not agree that it is ‘laying waste’ to these receptors, as evidenced by the results of its assessments.</p>
Landscape and Visual	Impact of construction on visuals	The imposition of perimeter wire fences (3m high!) is going to create a monstrous scar across the landscape - blocking views, disrupting access. At least when	The Design and Access Statement <b>[APP-204]</b> sets out how the design of the Proposed Development has

		<p>Rutland Water was imposed it had positive community value in the landscape - a solar farm is just a mass of metal, plastic and fences scarring the landscape.</p>	<p>responded to its context and sought to sensitively assimilate within the landscape.</p> <p>Appendix 5.1 of the ES <b>[AS-012]</b> and the Design Guidance within the DAS <b>[APP-204]</b> sets out that fencing would comprise a wooden post up to 2.1m high with a wide wire mesh fence up to 2m) which would include small mammal gates at regularly intervals to allow small mammals passage. Metal palisade fencing up to 3m high is proposed for areas around the Primary Substation only.</p>
Land Use and Soils	Loss of arable land	<p>We do not agree with removing perfectly good agricultural land when we still need to import food stuffs to the UK – current shortages can't go on. We should be preserving this good agricultural land and only using brown field sites, old quarries etc - land which has low value for agriculture for solar farms. It seems that the proximity of a sub-station is dictating where to put solar panels regardless of the negative impact on other land uses. The pressure to accept Europe's largest solar farm just to make good use of capacity in a sub-station is just lunacy. These panels should be distributed across the country to where the energy will be used, minimising the environmental impact of their placement.</p>	<p>The agricultural land will not be lost. The great majority of the land resource will not be permanently affected as an agricultural resource by the installation of panels as part of the Proposed Development. An assessment of the areas affected by tracks, solar stations and the substation is set out in the ES Chapter 12 at Table 12-6 <b>[APP-114]</b>. The area extends to 14.4ha, of which 0.5ha is Grade 2 and 3.7ha is sub-grade 3a land within the Best and Most Versatile agricultural land definition.</p> <p>Consideration of the food production and economic implications of the use of the BMV land for the Proposed Development compared to the production from poorer quality land are set out in the ES at sections 12.4.83 and Table 12-11 <b>[APP-114]</b>. In short, the Applicant does not consider that the Proposed Scheme affects the UK's food security (noting in any event that this is not a matter protected in policy terms).</p>

			<p>The incremental reduction of crop production from the BMV land compared to non-BMV land is of the order of 250 tonnes (ES 12.4.84) from an annual production of 21million tonnes (ES 12.4.76).</p> <p>There are no policies or obligations to farm agricultural land in any particular farming manner or to any particular crop or stocking, see the ES Chapter 12 at 12.4.67 and 68.</p> <p>Agricultural use in the form of livestock grazing will continue under and around the panels, and on retained agricultural land.</p>
Water Resources and Ground Conditions	Flood Risk	The water catchment area of these solar panels will be several times that of the floor space they occupy therefore massively increasing the amount of rain water normally collected in this area. I doubt very much whether anyone from the developers has calculated the increased amount of extra water that these solar panels will collect and the impact on the water table and local flooding.	<p>Calculations of surface water run-off rates pre and post-development are outlined in Appendix 11.6: Outline Surface Water Drainage Strategy of the Environmental Statement <b>[APP-087]</b>, specifically Section 3 addresses run-off from the PV arrays (including providing runoff calculations for the PV arrays).</p> <p>Installation of the PV arrays does not involve the introduction of hardstanding at ground level meaning the superficial cover for the majority of the Order Limits will remain the same as the baseline. Additionally, the PV array tables will have regular rainwater gaps to prevent water being concentrated along a single dripline.</p>
Socio-economic impacts	Impact on tourism	Local tourism will be negatively impacted by having acres of fields covered in black solar panels? Stamford and the surrounding area is a beautiful natural	The assessment of potential impacts on tourism during the construction, operation and decommissioning phases is undertaken as part of the

		<p>landscape. The developer is however immune from this because they don't actually care about the impact on tourism and the related local economy.</p>	<p>socio-economics assessment provided in chapter 14 of the Environmental Statement <b>[APP-044]</b>. It concludes that, given the only adverse effects would be experienced by users of PRow within and closest to the Order limits and that accommodation providers could potentially benefit from additional income from staying workers, it is considered that, on balance, the construction phase will have a negligible to minor adverse effect on tourism. It is also considered that the presence of the Proposed Development would only have a negligible to minor adverse effect on tourism during the operational phase, which is not significant.</p> <p>Furthermore, the Applicant disagrees that the visual impact of the Scheme will negatively impact on tourism in the area, given the conclusions of the LVIA assessment in the Environmental Statement.</p>
<p>Cumulative Impacts</p>	<p>Impacts on amenity</p>	<p>Erecting high fences, creating huge exclusion zones, adding black lifeless sheets of plastic and steel to the landscape - these will only have massive negative impact on recreation and amenity. Footpaths diverted, high fences instead of hedgerows and trees, lifeless landscape, these will have a huge negative impact on everyone's enjoyment of the countryside.</p>	<p>The Design and Access Statement <b>[APP-204]</b> sets out how the design of the Proposed Development has responded to its context and sought to sensitively assimilate within the landscape.</p> <p>Appendix 5.1 of the ES <b>[AS-012]</b> and the Design Guidance within the DAS <b>[APP-204]</b> sets out that fencing would comprise a wooden post up to 2.1m high with a wide wire mesh fence up to 2m) which would include small mammal gates at regularly intervals to allow small mammals passage. Metal palisade fencing up to 3m high is proposed for areas around the Primary Substation only.</p> <p>An Amenity and Recreation Assessment was undertaken and is presented in the ES Chapter 6</p>

			<p>Appendix 6.5 [APP-058] which concluded that whilst impacts to PRow within the site during construction would be significant, operation impacts would not be significant following mitigation post 15 years when mitigation planting has matured. In relation to the two PRowS within the Solar PV Site where this is not the case (Bridleways E169 and E182) offsets of at least 15m are proposed along with new planting so that overtime the impact on the recreational amenity of these routes will reduce (although still acknowledged to be significant in LVIA terms).</p>
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**Lincolnshire Wildlife Trust (RR-0635)**

Topic	Theme	Statutory Consultee Comment	MPSF Response
Ecology and Biodiversity	Impacts on habitats and species	To summarise, Lincolnshire Wildlife Trust consider the main issues and impacts of this development to be those affecting the habitats and species both on site and the areas surrounding the site, and how negative effects felt here will degrade the integrity of the ecological networks of the wider landscape.	<p>Chapter 7: Ecology and Biodiversity, of the ES [APP-037], presents the approach and findings of the assessment of potential impacts on Ecology and Biodiversity. This includes impacts to ecological features within and outside the Order limits as appropriate. Embedded mitigation measures include the details set out in the outline Construction and Environmental Management Plan (oCEMP) [APP-207], outline Decommissioning and Environmental Management Plan (oDEMP) [APP-209] and outline Landscape and Ecological Management Plan (oLEMP) [APP-210].</p> <p>These documents have been prepared and include mitigation measures which are intended to avoid the risks of effects during the construction and decommissioning phases, such as indirect and direct damage to retained features, direct damage to active bird nests and injury to protected species or damage to the habitat of those species. The assessment of potential effects takes these measures into account</p>
Ecology and Biodiversity	Ecological site designations	98 ecological site designations considered within, adjacent to or near the site boundary.	<p>The presence of Designated sites within the Order limits has been considered in Chapter 7: Ecology and Biodiversity, of the ES [APP-037], which presents the approach and findings of the assessment of potential impacts on Ecology and Biodiversity.</p> <p>Embedded mitigation measures include the details set out in the outline Construction and Environmental</p>

			<p>Management Plan (oCEMP) [APP-207], outline Decommissioning and Environmental Management Plan (oDEMP) [APP-209] and outline Landscape and Ecological Management Plan (oLEMP) [APP-210]. These documents have been prepared and include mitigation measures which are intended to avoid the risks of effects during the construction and decommissioning phases, such as indirect and direct damage to retained features, direct damage to active bird nests and injury to protected species or damage to the habitat of those species. The assessment of potential effects takes these measures into account</p>
Traffic and Transport	Construction Traffic	Construction traffic negatively impacting locally and nationally designated road verges.	<p>Construction vehicles will only use the permitted routes to access the Order Limits. The routes to the primary construction compound are Routes 1 and 3 as shown on Figure 3-1 in the oCTMP [APP-212]. These routes have been selected as they form the most direct, suitable means of access to the Order Limits from the SRN, that are considered to be appropriate to accommodate HGV traffic given there is already an existing level of HGV traffic identified on these roads. Use of these roads exclusively will limit the impact on the wider road network, ensuring that only the roads identified as being suitable are used and in turn reducing any potential adverse effects. This will be secured by way of requirement in the DCO through the final CTMP. Breaching the requirements of the DCO is a criminal offence. These routes are described in detail within the oCTMP [APP-212].</p> <p>The one-way routing of construction traffic along Route 1 and Route 3 prevents two-way conflicts</p>

			<p>between HGVs which in turn prevents damage to the verges. In addition, the use of a consolidation strategy to the primary construction compound reduces the likelihood of any two-way HGV conflicts by providing more control over the timings of deliveries, reducing the potential for damage to the verges. Where two-way flows are possible along Uffington Lane, temporary passing places will be implemented which will be reinstated as verge once the construction works are complete. The location of the passing places has been chosen to limit the impacts to the verges overall, whilst still allowing for HGVs to pass one another.</p> <p>Passing places will be introduced along Uffington Lane to help facilitate two-way flows for the construction phase, as well as minor widening works to the A6121 / Uffington Lane priority junction. More details are provided within Appendix 9.4 of ES Chapter 9 <b>[APP-074]</b></p> <p>Both the oCEMP [APP-207] and the OLEMP [APP-212] require that any affected verges are restored post construction.</p>
Ecology and Biodiversity	Habitat Enhancement	Ensuring habitat enhancement proposals for less ecologically valuable elements along land parcel boundaries are provided, as well as plans to improve habitat connectivity.	The Green Infrastructure (GI) strategy for the Proposed Development has been prepared to consider opportunities for connecting habitats within that would deliver environmental and/or biodiversity net gain and consider other community



			<p>enhancements and is secured through the Outline Landscape and Ecology Management Plan <b>[APP-210]</b>.</p> <p>Some of the key principles of the GI Strategy include the retention of existing vegetation within the Order limits wherever possible with the Proposed Development, the planting of new tree belts, hedgerow trees and hedgerows, the reconnection of existing habitats and designated ecological sites through new woodland, grassland and hedgerows planting that is reflective of local soil conditions and existing species and as part of landscape scale GI enhancements and facilitating a network of permeable 'wildlife corridors' throughout the Order limits.</p> <p>For more information, please see the Design and Access Statement, <b>[APP-204]</b>.</p>
Water Resources and Ground Conditions	Surface Water flood risk	Using the surface water flooding maps to best create permanent and temporary wetland habitat.	<p>The Design and Access Statement <b>[APP-204]</b> sets out in detail on how the design of the proposed development has responded to its context, including the design principles applied to the riparian corridor along the West Glen River which is used as a key structuring Green Infrastructure for the proposed development.</p> <p>The OLEMP <b>[APP-210]</b> describes the habitat proposals for the Proposed Development and what they seek to achieve in light of the baseline ecology that is present within the Order limits. In that context, further wetland habitat is not considered necessary.</p>

Ecology and Biodiversity	Impacts on ecological corridor	Risks to ecological corridor functionality as a result of the development	<p>The Green Infrastructure (GI) strategy for the Proposed Development has been prepared to consider opportunities for connecting habitats within that would deliver environmental and/or biodiversity net gain and consider other community enhancements and is secured through the Outline Landscape and Ecology Management Plan <b>[APP-210]</b>.</p> <p>Some of the key principles of the GI Strategy include the retention of existing vegetation within the Order limits wherever possible with the Proposed Development, the planting of new tree belts, hedgerow trees and hedgerows, the reconnection of existing habitats and designated ecological sites through new woodland, grassland and hedgerows planting that is reflective of local soil conditions and existing species and as part of landscape scale GI enhancements and facilitating a network of permeable ‘wildlife corridors’ throughout the Order limits.</p> <p>For more information, please see the Design and Access Statement, <b>[APP-204]</b>.</p>
Ecology and Biodiversity	Impacts on habitats and species	Injury or death to various species if moving parts of tractor arrays are included in the design	The moving parts proposed for the Application Site will not move at such a speed that wildlife could become entangled or crushed.
Ecology and Biodiversity	Impacts on habitats and species	Potential collision risks for birds associated with reflective solar panels	Chapter 7: Ecology and Biodiversity, of the ES <b>[APP-037]</b> , presents the approach and findings of the assessment of potential impacts on Ecology and Biodiversity. Evidence for birds landing on, or colliding with, solar panels is limited and not directly applicable to the UK. Large scale and long running monitoring

			projects carried out by Clarkson & Woods (2019, 2020 & 2021) resulted in a number of annual reports on multiple sites and no evidence of death as a result of collision with solar panels by birds has been recorded.
Ecology and Biodiversity	Provision of trees	Retention of all trees showing bat roost potential, and the planting of successor trees to secure perpetuity of connectivity and habitat provision	<p>All mature trees are to be retained including those with suitability for supporting roosting bats. Furthermore, the outline CEMP <b>[APP-207]</b> provides for buffer zones around such trees.</p> <p>The Green Infrastructure strategy within Mitigation and Enhancement Areas will be used to deliver a net gain in biodiversity through the planting of approximately 7,500m of structural tree planting.</p>
Ecology and Biodiversity	Impacts on habitats and species	Wide buffers around watercourses with evidence of water vole or otter presence.	The Design and Access Statement <b>[APP-204]</b> sets out in detail on how the design of the proposed development has responded to its context, including the design principles applied to watercourses with a provision of at least 10m offsets to perimeter fencing from main watercourses and 6m from ditches.
Ecology and Biodiversity	Impacts on habitats and species	Native hedgerow and tree retention and associated buffer zones	<p>The Design and Access Statement <b>[APP-204]</b> sets out in detail on how the design of the proposed development has responded to its context, including the design principles applied to existing hedgerows and trees.</p> <p>A buffer of at least 10m to the perimeter fence has been applied to all existing hedgerows and 15m for woodland and veteran trees and the protection and enhancement of hedgerows is a key objective of the outline LEMP <b>[APP-210]</b>.</p>
Ecology and Biodiversity	Native woodland	Retention, buffering, enhancement and connection of existing native woodland	The Design and Access Statement <b>[APP-204]</b> sets out how the design of the Proposed Development has

			<p>responded to its context, including the project principles and design guidance applied to areas of woodland. The Proposed Development connect up existing areas of woodland through new planting as illustrated on the Green Infrastructure Strategy Plan <b>[APP-173]</b></p> <p>All existing woodland will be retained and an offset of at least 15m is proposed (Design Principle V5.5.) as set out in the DAS.</p> <p>All new planting and existing vegetation would be managed in accordance with the measures set out within the outline Landscape and Ecology Management Plan <b>[APP-210]</b> which seeks to improve the biodiversity value of natural habitats across the site.</p>
Ecology and Biodiversity	Landscaping mitigation	Use of structural grassland and scrub mosaic margins to create 'soft' woodland edges.	<p>The Green Infrastructure Strategy Plan <b>[APP-173]</b> contained at Figure 6.11 of the LVIA <b>[APP-036]</b> illustrates spatially the location of grassland and scrub planting. T</p> <p>As part of the Design Guidance set out within the DAS <b>[APP-204]</b> a buffer of at least at 10m from existing field boundaries and 15m from woodland is proposed. These 'edges' would be managed for wildlife purposes and allowed to 'scrub up' subject to operational requirements.</p> <p>These, along with the riparian habitats proposed along the West Glen Corridor and retained and enhanced woodland would create a 'mosaic' of habitats at the</p>

			<p>landscape scale. In addition, grassland with wildflowers underneath the panels and in field margins and meadow grassland with calcareous species in the west would further contribute to the mosaic of habitats across the Order limits at wider network.</p> <p>All new planting and existing vegetation would be managed in accordance with the measures set out within the outline Landscape and Ecology Management Plan <b>[APP-210]</b> which seeks to allow vegetation to grow out more fully and improve the biodiversity value of natural habitats across the site.</p>
Ecology and Biodiversity	Habitat creation and enhancement	Species-rich grassland habitat creation and enhancement.	<p>The Green Infrastructure Strategy Plan <b>[APP-173]</b> contained at Figure 6.11 of the LVIA <b>[APP-036]</b> illustrates spatially the location of grassland and scrub planting. This includes encouraging grassland with calcareous species in the west of the site and also wildflower grasslands in the central and eastern areas.</p> <p>All new planting and existing vegetation would be managed in accordance with the measures set out within the outline Landscape and Ecology Management Plan <b>[APP-210]</b> which seeks to allow vegetation to grow out more fully and improve the biodiversity value of natural habitats across the site.</p> <p>The improved diversity of the grassland sward is proposed underneath the solar panels and edge areas between them and field boundaries. Grassland with calcareous species is also proposed in the west of the Order Limits where the land is underlain by limestone geology.</p>

<p>Ecology and Biodiversity</p>	<p>Habitat creation and enhancement</p>	<p>Establishing a habitat mosaic within each land parcel and subsequent management.</p>	<p>The Green Infrastructure Strategy Plan <b>[APP-173]</b> contained at Figure 6.11 of the LVIA <b>[APP-036]</b> illustrates spatially the location of grassland and scrub planting.</p> <p>All new planting and existing vegetation would be managed in accordance with the measures set out within the outline Landscape and Ecology Management Plan <b>[APP-210]</b> which seeks to allow vegetation to grow out more fully and improve the biodiversity value of natural habitats across the site.</p> <p>The improved diversity of the grassland sward is proposed underneath the solar panels and edge areas between them and field boundaries. Grassland with calcareous species is also proposed in the west of the Order Limits where the land is underlain by limestone geology.</p> <p>As part of the Design Guidance set out within the DAS <b>[APP-204]</b> a buffer of at least at 10m from existing field boundaries and 15m from woodland is proposed. These ‘edges’ would be managed for wildlife purposes and allowed to ‘scrub up’ subject to operational requirements.</p> <p>These, along with the riparian habitats proposed along the West Glen Corridor and retained and enhanced woodland would create a ‘mosaic’ of habitats at the landscape scale. In addition, grassland with wildflowers underneath the panels and in field margins and meadow grassland with calcareous species in the west would further contribute to the</p>
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			mosaic of habitats across the Order limits at wider network.
Ecology and Biodiversity	Biodiversity Net Gain (BNG)	Achieving a minimum of 10% Biodiversity Net Gain as a result of this development which would be supported by an appropriate post-intervention habitat monitoring and management plan for a minimum period of 40 years to match the scheme lifetime.	As set out in the BNG metric <b>[APP-064]</b> overall, the Proposed Development results in a net gain for both habitats (72.19%) and hedgerow (40.83%). There is a 0% change for river units. The outline Landscape and Ecology Management Plan <b>[APP-210]</b> sets out the basis of what measures will be implemented in terms of habitat creation, minimize and monitoring.

**Mallard Point Ltd (RR-0677)**

Topic	Themes	Statutory Consultee Comment	MPSF Response
Size and Scale	Location/Size of proposed development	Mallard Pass if passed for Planning would be the largest Solar Plant in the UK to date. Full and proper consideration is required to assess the greater impact this project would have because Solar is incapable of replacing fossil fuels without causing extreme environmental harm in the manufacturing, construction and de mobbing phases.	<p><b>Section 8.5 of the Statement of Need [APP-202]</b> describes and agrees with Government’s view that 59inimize5959zed and community energy systems are unlikely to lead to the significant replacement of large-scale infrastructure. It is the Applicant’s view (and this aligns with Government’s view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p> <p>As discussed in section 8.5 <b>Statement of Need [APP-202]</b>, which concludes that the development of large sites (which connect to the transmission network) is essential in order to connect the scale of new capacity required to meet Net Zero requirements. On this basis, the emphasis should be on 59inimize5959 the use of available capacity at grid connections where they occur. Consideration was therefore given to areas in the UK where grid connections were available and that were suitable for solar development.</p> <p><b>Section 8 of the Planning Statement [APP-203]</b> concludes with a consideration of the Planning Balance and justifies how the overwhelming national need, as demonstrated in the <b>Statement of Need [APP-202]</b> outweighs any potential significant adverse impacts which, as the <b>Environmental Statement [APP-047]</b> sets out, are limited.</p> <p>As set out in the Environmental Statement, it is not the case that ‘extreme environmental harm’ arises from the Proposed Development.</p>



Statement of Need	Need for Solar	<p>Solar energy is extremely diffuse, it takes a large amount of resources, spread over a wide area in order to collect a large amount of energy. Solar energy is variable and don't supply energy on demand. In the last year to date (02/02/23) Solar production has supplied and met ONLY 4.4% of UK Energy. (source [Redacted]) It is therefore questionable if this development is required for Energy or for Profit.</p>	<p><b>Section 3.3</b> of the <b>Statement of Need [APP-202]</b> describes Government's view that large capacities of low-carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar", so the % contribution of solar will continue to grow. This philosophy of support for large scale solar as part of the 'answer' to net zero has been repeated in its recent policy documents published in March 2023.</p>
Other Environmental Considerations	Glint and Glare	<p>The site is near many residents houses and businesses and roadways. Glint and Glare and Flicker can cause, Evidence shows effects and triggers with Epilepsy and other conditions. As a site that has a Long Boundary to this potential development it is unacceptable for Health at both home and work to be massively impacted and NO engagement by the Developer has been received despite informing on numerous occasions. Glare from solar panels can represent a risk to drivers in an area already suffering a high level of road accidents. Furthermore, evidence shows that birds can mistake solar panels for water, resulting in major disruption to their habitats.</p>	<p>A Glint and Glare Assessment is provided at Appendix 15.3 of the ES, which assesses the likely impacts of the development upon receptors <b>[APP-0104]</b>. The modelling has shown that solar reflections are geometrically possible towards 113 of the 179 assessed dwelling receptors. Solar reflections towards most of these dwellings are predicted to be significantly obstructed by existing and proposed screening, or they do not occur for a duration that could be considered significant. Additional mitigation has been implemented for one dwelling due to significant effects being predicted, regardless of the panel mounting system (fixed or tracker). An area of new and improved hedgerow is proposed to be planted to the east of the dwelling which will provide filtering and screening of the Solar PV Site. In terms of impacts on road traffic, the assessment concludes that screening in the form of existing vegetation and proposed screening is predicted to significantly obstruct all views of the reflecting panels from road traffic and as such no significant effects are likely.</p>

			Evidence for birds landing on, or colliding with, solar panels is limited and not directly applicable to the UK. Large scale and long running monitoring projects carried out by Clarkson & Woods (2019, 2020 & 2021) resulted in a number of annual reports on multiple sites and no evidence of death as a result of collision with solar panels by birds has been recorded.
Socio-economic impacts	Impacts on tourism and local economy	OURs and other Local businesses reliant on the tourism / visitor draw of the great outdoors, nature and Rutland and South Lincolnshire will suffer. There will be little / if any during the Construction phase once people suffer the traffic and noise– more likely hindered and damage putting people off visiting, and once built the Containers, fencing, 13m high building, aesthetics and loss of scenery, noise and hum certainly will. Screening is always used as the mitigation. To hide the ugliness.	The assessment of potential impacts on tourism during the construction, operation and decommissioning phases is undertaken as part of the socio-economics assessment provided in chapter 14 of the Environmental Statement <b>[APP-044]</b> . It concludes that, given the only adverse effects would be experienced by users of ProW within and closest to the Order limits and that accommodation providers could potentially benefit from additional income from staying workers, it is considered that, on balance, the construction phase will have a negligible to minor adverse effect on tourism. It is also considered that the presence of the Proposed Development would only have a negligible to minor adverse effect on tourism during the operational phase, which is not significant. The Environmental Statement reports that no significant adverse effects are expected in relation to traffic or noise impacts in the construction or operational phases.
Local Community	Community Benefits	There is NO Direct benefit to the local economy or Villages from this planned development. Again by the proposed restriction of access through Compulsory Acquisition and /or Cancellation of access rights will Catastrophically curtail our business and its operations.	As explained in the Statement of Need <b>[APP-202]</b> and summarised in Sections 3 the Planning Statement <b>[APP-203]</b> , the Proposed Development has the potential to deliver significant amounts of low-carbon electricity and make a material contribution to help meet the UK’s commitments to decrease carbon emissions and reach net zero by 2050.

			<p>Chapter 10 of the ES <b>[APP-030]</b> concludes that there will be beneficial employment and linked supply chain impacts associated with the Proposed development. The Employment, Skills and Supply Chain Plan <b>[APP-211]</b> is aimed at maximising these benefits.</p> <p>Additional benefits of the to the local community are set out in the Planning Statement and include a Biodiversity Net Gain of 72% and new permissive paths that will be retained during the operational phase of the Proposed Development, improving connectivity across the Order limits.</p> <p>Section 8 of the Planning Statement <b>[APP-203]</b> concludes with a consideration of the Planning Balance and justifies how the overwhelming national need, as demonstrated in the Statement of Need <b>[APP-202]</b> outweighs any potential significant adverse impacts which, as the Environmental Statement sets out, are limited.</p> <p>The Applicant has identified Mallard Point Limited as being directly affected by any of the land powers sought by the Application.</p> <p>There is no intention to restrict any public rights of way over land required for the Proposed Development. The need to account for users of Public Rights of Way and enhance connectivity in the area has informed the development of the design.</p>
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			<p>The Employment, Skills and Supply Chain Plan, which is secured through Requirement 17 of the DCO, will be agreed with local stakeholders prior to the commencement of construction which will set out measures the Applicant will implement in order to promote and enable access to the employment and supply chain opportunities.</p>
Land and Property	Compulsory Acquisition	<p>The developers intent to request compulsory acquisition rights, on Bourne Rd, was not made clear during the consultation period. Routing of Cabling back to Substation was always described by under the land the planned scheme was using. This seems a deliberate misrepresentation included at the last minute. At No Point has [Redacted] or those acting on there behalf- highlighted or Informed us of there intention to CANCEL and / or REMOVE OUR LEGAL RIGHT to access and operate our Business and for an undisclosed / confirmed amount of time.</p>	<p>The Applicant does not propose to compulsory acquire any garden land. Whilst the Land Plans <b>[APP-005]</b> appear to show land take within properties on Bourne Road, this is not the case. As explained in Note 2 to the Land Plans, the plot boundaries have been drawn to the Land Registry boundaries, or where it is available and differs from those boundaries, topographical survey data. The accuracy of these information sources differs from OS Base Mapping, which results in the plot boundaries and/or the Order limits not aligning with the line work shown on the OS Base Mapping.</p> <p>The 63inimiption of the plots in the Book of Reference <b>[APP-023]</b> make clear that no properties are proposed to be subject to the land powers in the DCO.</p> <p>To be clear, there is no intention to cancel or remove people’s rights to access their homes or business. Compulsory acquisition powers in Bourne Road are sought only for rights to lay and maintain the subsoil cable for the Proposed Development.</p>

Land Use and Soils	Loss of arable/agricultural land	<p>This application does not satisfactorily mitigate a loss of this asset on this scale and does not commit or guarantee that the land will ever return to food production. This land is suitable for growing other diversified crops or Top fruits which would mean this land could stay in Agriculture- Furthermore Wind Turbines would mean the Land could still be farmed with Crops or Livestock underneath, and benefit with significantly better Energy generation.</p>	<p>The agricultural land will not be lost. The great majority of the land will not be permanently affected as an agricultural resource by the installation of panels as part of the Proposed Development. An assessment of the areas affected by tracks, solar stations and the substation is set out in the ES Chapter 12 at Table 12-6 <b>[APP-114]</b>. The area extends to 14.4ha, of which 0.5ha is Grade 2 and 3.7ha is sub-grade 3a land within the Best and Most Versatile agricultural land definition.</p> <p>Consideration of the food production and economic implications of the use of the BMV land for the Proposed Development compared to the production from poorer quality land are set out in the ES at sections 12.4.83 and Table 12-11 <b>[APP-114]</b>.</p> <p>The incremental reduction of crop production from the BMV land compared to non-BMV land is of the order of 250 tonnes (ES 12.4.84) from an annual production of 21million tonnes (ES 12.4.76).</p> <p>There are no policies or obligations to farm agricultural land in any particular farming manner or to any particular crop or stocking, see the ES Chapter 12 at 12.4.67 and 68.</p> <p>Agricultural use in the form of livestock grazing will continue under and around the panels, and in the retained agricultural land.</p>
Land Use and Soils	BMV Land	Government guidance is clear that energy projects should not be built on BMV land.	It is stated that the ALC testing is in doubt. No details are provided so a response is not possible. The ALC

		<p>The level of BMV land on this site exceeds this and therefore a clear breach of Government guidance by the developers. The Testing of the land to make the required grade amounts is also in question and should be cross examined.</p>	<p>survey was carried out by highly skilled and experienced soil surveyors and is reported in the ES Appendix 12.4 <b>[APP-091]</b></p>
<p>Environmental Topics</p>	<p>Health impacts</p>	<p>On the one hand little or total disregard to gathering and presenting data regarding topics that would have more detrimental effects on residents e.g. Health and Glint and Glare but also the limited snapshot undertaking of research e.g. Traffic movements which for the construction and demobbing of this site are inadequate and fail to demonstrate the magnitude of the disruption and disrepair the local area will face.</p>	<p>The Planning Inspectorate agreed in their EIA Scoping Opinion <b>[APP-050]</b> that human health impacts should be addressed through the relevant technical assessments:</p> <ul style="list-style-type: none"> <li>• Highways and Access <b>[APP-039]</b></li> <li>• Noise and Vibration <b>[APP-040]</b></li> <li>• Other Environmental Topics including Air Quality, Glint and Glare, Major Accidents and/or Disasters and Utilities) <b>[APP-045]</b></li> </ul> <p>These assessments conclude that there would be no significant effects on human health.</p> <p>A Glint and Glare Assessment is provided at Appendix 15.3 of the ES, which assesses the likely impacts of the development upon receptors <b>[APP-0104]</b>. The assessment concludes that screening in the form of existing vegetation and proposed screening is predicted to significantly obstruct all views of the reflecting panels from roads and bridleways, as such no significant effects are likely.</p> <p>The Highways and Access assessment concludes that there would be no significant adverse effects as a result of construction traffic. This assessment was undertaken on the basis of baseline traffic flows collected from a combination of automatic traffic count data and data from the Department for</p>


			<p>Transport across 22 road links potentially affected by the construction of the Proposed Development. This covers all the proposed construction routes to the Order limits. This is a comprehensive dataset to inform the assessment of construction traffic.</p>
<p>Traffic and Transport</p>	<p>Impact of increased traffic</p>	<p>The arterial road network is already busy during the expected commuter and school times with out adding disproportionate volumes of construction traffic for extended periods of time creating a Negative impact. The Road Quality in many places is in a just about serviceable state, as the Development bares NO local benefit It should not be a further expense shouldered by our councils. The amounts and types of loads will invariably create Road Safety Issues.</p>	<p>The delivery hours of HGVs to the primary compound will be restricted to avoid morning and evening peak hours, as well as avoiding school drop-off and pick up hours – meaning on weekdays HGV deliveries to the primary compound will only take place between 09:00-15:00. This will be secured by way of requirement in the DCO requiring the development and approval of a final CTMP (which will be in accordance with the oCTMP). Breaching the requirements of the DCO is a criminal offence. Further details on these measures are provided in Section 4 of the oCTMP <b>[APP-212]</b>.As set out in ES Chapter 9 <u>Highways and Access [APP-039]</u>, the Proposed Development will result in a negligible increase in traffic on the majority of the local network, with less than a 2% or lesser increase in the daily vehicle flows. Where there is a greater impact on Uffington Lane from increased numbers of HGVs, mitigation is proposed in the form of passing places and widening at the junction with the A6121 to help facilitate two-way HGV flows. The delivery of this mitigation is secured through the outline Construction Traffic Management Plan (oCTMP) <b>[APP-212]</b>.</p> <p>Highway condition surveys will be undertaken both before and after construction to determine the state</p>

			<p>of the existing highway, the scope of which will be agreed with RCC and LCC. The Applicant will repair any damage caused to highways as a result of construction traffic to a standard set out in the pre-construction surveys. Enabling works will also be provided at the access points across the Order limits to upgrade the existing access points to an appropriate standard. Further details are provided within Section 4 of the oCTMP <b>[APP-212]</b>.</p>
Design and Access	Timescales of the project	<p>Currently the Developers have failed to state a time line for end of life of the site. Again The Developers have been very unclear as on so many statements and unable to answer how and when they will return the sites. The unfortunate legacy of this industrial creation could leave the local villages with a Solar Graveyard.</p>	<p>The Planning Statement <b>[APP-203]</b> addressed project lifetime at paragraphs 5.3.27 to 5.3.33.</p> <p>This confirms that the Applicant is not seeking a time limited consent, as the ES has not identified any specific project impact which would require the development to be linked to a specific operational timeframe. However, as noted in NPS EN-3, it is recognized that solar panel efficiency deteriorates over time and the electrical infrastructure will have an operational lifespan, after which it will need to be replaced or removed.</p> <p>The ES also sets out how the Proposed development would be decommissioned at the end of the operational life of the generating station.</p> <p>Requirement 18 of the draft DCO <b>[APP-017]</b> provides that the undertaker must submit a decommissioning plan for approval within 12 months of the date that the undertaker decided to decommission any part of the development. This must be in accordance with the outline DEMP <b>[APP-207]</b> which</p>



			sets out how the impacts of such decommissioning should be managed.
Water resources and ground conditions	Flood Risk	There are existing flood risks and a flooding history in this area that has not been adequately considered in this application. Compacted ground over time will advance more run off in wet periods than currently received from higher ground onto our business along with the runoff from the panels will contribute to exacerbating this.	<p>A Flood Risk Assessment has been undertaken and can be found within Appendix 11.5 of the Environmental Statement <b>[APP-086]</b> and at Section 1.8 <i>Historical Flooding</i> and Section 2.1 consideration is given to existing flood risks and the flooding history of the local area. The Order limits of the Proposed Development is not located in areas with a recorded previous flooding history. The assessment also found that the implementation of measures from the Outline Surface Water Drainage Strategy (Appendix 11.6 of the ES <b>[APP-087]</b>) will prevent an increase in flood risk elsewhere in the area i.e. downstream of the Proposed Development.</p> <p>The Surface Water Drainage Strategy <b>[APP-087]</b> also includes information about the proposed management of surface water runoff rates from the Proposed Development including from panels and access tracks.</p> <p>Table 1-1 Summary of Mitigation Measures within the Outline Water Management Plan <b>[APP-214]</b> details that measures to prevent compaction of soil during construction, such as avoiding tracking over soils when too wet, are detailed in and secured by the Outline Soil Management Plan<b>[APP-213]</b>.</p>
Consultation	Lack of communication with local community	Throughout the developers at consultation have failed to engage in good faith and honesty with the Villages or to Individuals.	The Applicant is confident it acted professionally at all times throughout the public consultation process and has always been

		From personal experience and having been ignored or not responded to on numerous points raised, There is a total breakdown of trust and good faith.	committed to open and transparent public consultation that sought the views of the community extensively to inform the final design of the project. This is described and evidenced in the Applicant's Consultation Report <b>[APP-025]</b> which was reviewed and accepted by the Planning Inspectorate (PINS) on 21 December 2022.
Consultation	Inaccuracy of consultation report	The consultation summary submitted by the developers in their application is inaccurate in several areas, including misleading and false claims over topics discussed with me at meetings.	The Applicant conducted a thorough consultation on the Proposed Development across multiple phases of consultation, consistent with relevant legislation and compliance with the Planning Act 2008. This is described and evidenced in the Applicant's Consultation Report <b>[APP-025]</b> which was reviewed and accepted by the Planning Inspectorate (PINS) on 21 December 2022.
Supply Chain	Adequacy of Applicant	There are substantial concerns over the financial record of [Redacted] leadership team and their inexperience to construct a project of this magnitude.	<p>The Applicant is well placed to build the Proposed Development as set out in the Funding Statement <b>[APP-022]</b>.</p> <p>The Applicant notes the provisions of article 44 of the draft DCO in this regard, which provides that no land powers can be exercised without the Secretary of State first approving a form of guarantee or other security for compensation costs. Funding will be available for the project, as set out in the Funding Statement [APP-022]</p> <p>Finally, it is also noted that breach of a DCO is a criminal offence, and with the various mitigation measures secured in the DCO, the responsible building of the Proposed Development can be assured.</p>
Consultation	Local petitions	Our MP's collected nearly 2500 signatures for a Parliamentary Petition against the	The Applicant understands the strength of feeling within the community, and has designed the scheme

		<p>development so far as a sign this is not wanted. Essendine Village – Most affected village has a population of 451.</p>	<p>to 70inimize the impacts to the local community, and to provide benefits. However, fundamentally, the Applicant is helping provide a response to urgent need for low carbon energy generation in the UK, as set out in the Statement of Need <b>[APP-202]</b>, and the Site Selection Assessment <b>[APP-203]</b> explains why the location of the Proposed Development is an appropriate site for a large scale solar project to form part of meeting that need.</p>
Project	Supply Chain	<p>There are well documented accusations against [Redacted] for human rights abuses in their supply chains, particularly concerning Uyghurs. It would be wrong to have this AND any other development built with this in its heritage.</p>	<p>The Applicant strongly condemns and opposes the use of forced labour in any context in the strongest possible terms. The Applicant fully supports the steps being taken by the UK government and solar industry to ensure the highest possible levels of transparency and to rid human rights abuses from the global supply chain for UK solar developments. While procurement has not been confirmed for the Proposed Development, the Applicant has prepared an Outline Employment, Skills, and Supply Chain Plan (OESSCEP) <b>[APP-211]</b>, submitted as part of the DCO application and secured by Requirement 17 of the draft DCO. The OESSCEP describes the Applicant’s ethical procurement policy which states that any potential supplier must participate in a modern slavery supplier due diligence exercise as part of the tender exercise.</p> <p>In addition to this, the Applicant has published clear statements on this topic, which condemn the illegal practice of modern slavery or forced labour of any kind.</p> <p>These statements can be found using the following URLs:</p> <ul style="list-style-type: none"> <li>• Canadian Solar: </li> </ul>

			<p>[REDACTED]</p> <p>[REDACTED]</p> <ul style="list-style-type: none"> <li>• Windel Energy: [REDACTED]</li> </ul> <p>The Applicant has signed the Solar Energy UK Industry Supply Chain Statement, a UK-based industry-wide condemnation of all human rights abuses, including forced labour in the global supply chain. The UK Industry Supply Chain Statement can be found using the follow URL: [REDACTED]</p>
Landscape and Visual	Long-term impacts on landscape	<p>There are concerns that the applicant’s assessments of the impact the development would have on the landscape are flawed. There is currently a technical landscape and visual assessment underway but more investigations are required to ensure any long-lasting changes to the land are properly considered.</p>	<p>The potential impacts to the landscape and visual resource has been assessed in accordance with best practice guidance and informed by consultation with stakeholders.</p> <p>The results of this assessment are set out in detail within the LVIA <b>[APP-036]</b>.</p> <p>The Design and Access Statement <b>[APP-204]</b> sets out how the design of the proposed development has responded to its context, including the design principles which have informed the design.</p> <p>The Green Infrastructure Strategy Plan <b>[APP-173]</b>, Figure 6.11 of the LVIA the Outline Landscape and Ecology Management Plan <b>[APP-210]</b> and the Work Plans <b>[APP-006]</b> illustrate the areas near to settlements proposed as Mitigation and Enhancement</p>

			Areas and detail how the retained and new planting proposed will be managed.
Ecology and Biodiversity	Damage to biodiversity	<p>The construction of the solar farm and the damage to ecosystems and habitats already existing in harmony with its surroundings will take years to reset. These farms already have well established Entry level and Stewardship schemes – Why upset it!! The area is home to a plethora of wildlife, particularly rare wild bird species. The assessments taken by the developers have not properly explored the impact this development would have on these rare species. Like the traffic surveys they have taken a snapshot in time not an understanding of what is actually here. Some species have been missed altogether.</p>	<p>Chapter 7: Ecology and Biodiversity, of the ES <b>[APP-037]</b>, presents the approach and findings of the assessment of potential impacts on Ecology and Biodiversity. The ecological and biodiversity assessment follows the general approach to undertaking EIA as explained in Chapter 2 of the ES, albeit it has been modified to take account of the main guidance document used when assessing impacts on ecological features, which is the Ecological Impact Assessment (EcIA) guidance published by the Chartered Institute for Ecology and Environmental Manage.</p> <p>Embedded mitigation measures include the details set out in the outline Construction and Environmental Management Plan (oCEMP) <b>[APP-207]</b>, outline Decommissioning and Environmental Management Plan (oDEMP) <b>[APP-209]</b> and outline Landscape and Ecological Management Plan (oLEMP) <b>[APP-210]</b>.</p> <p>These documents have been prepared and include mitigation measures which are intended to avoid the risks of effects during the construction and decommissioning phases, such as indirect and direct damage to retained features, direct damage to active bird nests and injury to protected species or damage to the habitat of those species, as well as operational mitigation and enhancement measures, such as identified skylark plots. The assessment of potential effects takes these measures into account.</p>

Climate Change	Carbon Benefit	<p>IF YOU WANT TO REDUCE CO2 EMISIONS / ENERGY USAGE- DON'T BUILD IT! There are questions over where the panels will be built and with what energy and materials used . In China for example it is not uncommon for panels to be built using power generated by burning coal. When shipping is considered of all the other components and the build and decommission, This project can't actually have a net-carbon benefit?</p>	<p>Solar is a low-carbon electricity generation technology. <b>Figure 7.3</b> of the <b>Statement of Need [APP-202]</b> shows the cumulative carbon emissions saved by solar generation versus the case that the electricity generated by solar was instead generated by Combined Cycle Gas Turbines (which emit carbon at a rate of 394 gCO<sub>2</sub>/kWh). The IPCC estimate of lifetime emissions of 48 kgCO<sub>2</sub>eq/MWh for utility scale solar generation (based on the median value from a range of 8 to 180 kgCO<sub>2</sub>e/MWh), includes embedded emissions in materials and the construction phase and is taken into account in the Applicant's assessment . <b>Figure 7.3</b> shows that carbon emissions from electricity generation would be higher if solar developments did not come forwards at the rate that National Grid project is required, than they would be if solar development follows National Grid's projections.</p>
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**Rotary Club of Stamford – Club no. 19155 (RR-1007)**

Topic	Theme	Statutory Consultee Comment	MPSF Response
Planning Statement	Principle of Development	I Agree with the need for more electricity produced in an environmentally friendly way.	Noted.
Planning Statement	Site selection	Why are you proposing to use grade 1 farming land, when there are many grey sites available locally?	<p>No Grade 1 land is included in the Proposed Development.</p> <p>The agricultural land will not be lost. The great majority of the land will not be permanently affected as an agricultural resource by the installation of panels as part of the Proposed Development. An assessment of the areas affected by tracks, solar stations and the substation is set out in the ES Chapter 12 at Table 12-6 [APP-114]. The area extends to 14.4ha, of which 0.5ha is Grade 2 and 3.7ha is sub-grade 3a land within the Best and Most Versatile agricultural land definition.</p>
Environmental Statement	Habitat enhancement	Can cattle and sheep graze beneath your proposed solar panels?	The land underneath and around the PV Arrays could be managed through a combination of sheep grazing and/or hay/silage production in order to maintain the field vegetation during the operational phase of the Proposed Development. The management of the Green Infrastructure and Mitigation and Enhancement Areas will be undertaken in accordance with the outline Landscape and Ecological Management Plan (oLEMP) [APP-210].

Commercial	Supply Chain	Why are the panels imported from China, when there are other more efficient panels made in Western countries?	As detailed in the Outline Employment, Skills, and Supply Chain Plan (OESSCEP), [APP-211], the Applicant is seeking opportunities to develop the local skills and supply chain base during the construction, operation, and decommissioning phases of the development.
<b><u>Community Planning Alliance (RR-0197)</u></b>			
<b>Topic</b>	<b>Theme</b>	<b>Statutory Consultee Comment</b>	<b>MPSF Response</b>
Planning Statement	Principle of Development	Our position is strongly in favour of net zero goals and of solar generation.	Noted.
Environmental Statement	Food security and environmental protection	However, the planning system needs to balance our need as a nation for food security and the need to protect the environment and the intrinsic value of countryside, as well as protecting heritage settings and vistas.	Noted. The planning system is designed to work in the public interest and requires the management and balancing of a number of variables. It is noted, however, that food security is not a matter set out as a consideration in planning policy, whether the NPS or NPPF. In any event, the Applicant considers, further to the analysis set out in the ES [APP-042] and the Planning Statement [APP-203] that the Scheme poses no risk to food security. The Scheme also does not lead to any significant effects to heritage settings and vistas, and through its design has mitigated most visual impacts of the Proposed Development.
Land Use and Soils	Loss of arable land	Huge scale ground-based solar on best farmland such as proposed in this NSIP takes agricultural land out of production, fences off the countryside from wildlife and humans and industrialises it in a way that is entirely inappropriate.	Draft NPS-3 advises that, where possible, applicants should seek to utilise previously developed land, brownfield land, contaminated land and industrial land. However, policy recognises that at utility scale it is likely that some developments may use agricultural land and that land type should not be a predominating factor in determining the suitability of the site location. The Applicant has sought to minimise the use of higher grade agricultural land but in order to deliver on the urgent national need for low-carbon energy



			<p>production some Grade 2 (35ha) and 3a (135ha) land is proposed to be temporarily used.</p> <p>Consideration of the food production and economic implications of the use of the BMV land for the Proposed Development compared to the production from poorer quality land are set out in the ES at sections 12.4.83 and Table 12-11 <b>[APP-114]</b>. The incremental reduction of crop production from the BMV land compared to non-BMV land is of the order of 250 tonnes (ES 12.4.84) from an annual production of 21million tonnes (ES 12.4.76).</p> <p>There are no policies or obligations to farm agricultural land in any particular farming manner or to any particular crop or stocking, see the ES Chapter 12 at 12.4.67 and 68.</p> <p>Agricultural use in the form of livestock grazing will continue under and around the panels, and on retained agricultural land.</p>
Environmental Statement	Impact upon Local Community	<p>There is plenty of rooftop space for solar – domestic, commercial and public. That will keep power close to where it is needed, thus reducing the need for trenching and transmission infrastructure.</p> <p>The Electricity Act 1989 schedule 9 seeks the preservation of amenity, including landscape, visual, cultural and ecological. It also goes on to talk about the desirability</p>	<p>The <b>Statement of Need [APP-202]</b> analyses the potential contribution of “brownfield” solar sites to the national need for solar generation. Brownfield sites, including rooftop and other community energy systems, are likely to grow in the UK and will make a contribution to decarbonisation of the UK energy system. However the <b>Statement of Need</b> concludes that on their own, brownfield developments are unlikely to be able to meet the national need for solar. <b>Section 8.5</b> of the <b>Statement of Need</b> describes and agrees with Government’s view that decentralized and community energy systems are unlikely to lead to the</p>

		<p>of preserving natural beauty, nature and heritage.</p>	<p>significant replacement of large-scale infrastructure. It is the Applicant's view (and this aligns with Government's view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p> <p>The Proposed Development has considered the factors set out in Schedule 9 of the EA1989 in the Environmental Statement – and no significant heritage or ecological impacts are assessed to arise, and only limited localised landscape and visual effects. The latter need to be seen in the context of the NPSs, which recognise that some landscape and visual effects are likely with new energy infrastructure.</p>
<p>Landscape and Visual</p>	<p>Impact upon local visuals and landscape</p>	<p>National Policy Statements set out how to ensure a balance is struck between need and harm. In this case, there is no need: ground-based solar panels are not needed because rooftops are available aplenty, and the harm to the environment and amenity is very great.</p>	<p><b>Section 7.6</b> of the <b>Statement of Need [APP-202]</b> analyses the potential contribution of “brownfield” solar sites to the national need for solar generation. Brownfield sites, including rooftop and other community energy systems, are likely to grow in the UK and will make a contribution to decarbonisation of the UK energy system. However the <b>Statement of Need</b> concludes that on their own, brownfield developments are unlikely to be able to meet the national need for solar. <b>Section 8.5</b> of the <b>Statement of Need</b> describes and agrees with Government's view that decentralised and community energy systems are unlikely to lead to the significant replacement of large-scale infrastructure. It is the Applicant's view (and this aligns with Government's view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation. This was re-acknowledged by the Government in its</p>

			<p>policy documentation published at the end of March 2023.</p> <p>The conclusions of the Environmental Statement demonstrate that it is not the case that the impacts of the Proposed Development are 'very great'.</p>
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**Carlby Walkers (RR-0131)**

Topic	Theme	Statutory Consultee Comment	MPSF Response
Size and Scale	Impact on local landscape	Sheer scale of the solar farm is impossible to mitigate impact on our lightly undulating countryside. It would completely ruin locality amenities.	<p>Section 3.3 of the Statement of Need [APP-202] describes Government’s view that large capacities of low-carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that “a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar”.</p> <p>The potential impacts to the landscape and visual resource, has been comprehensively assessed in accordance with best practice guidance and informed by consultation with stakeholders.</p> <p>The results of this assessment are set out in detail within the LVIA [APP-036] and concluded that only limited residual significant effects will arise.</p> <p>Furthermore, an Amenity and Recreation Assessment was undertaken and is presented in the ES Chapter 6 Appendix 6.5 [APP-058] which concluded that whilst impacts to ProW within the Solar PV Site during construction would be significant, operational impacts would not be significant following mitigation post 15 years when mitigation planting has matured. In relation to the two PRowS within the Solar PV Site where this is not the case (Bridleways E169 and E182) offsets of at least 15m are proposed along with new planting so that overtime the impact on the recreational amenity of these routes will reduce</p>

			<p>(although still acknowledged to be significant in LVIA terms).</p> <p>The Design and Access Statement <b>[APP-204]</b> sets out how the design of the Proposed Development has responded to its context, including the design guidance applied to ProW.</p> <p>The Green Infrastructure Strategy Plan <b>[APP-173]</b>, Figure 6.11 of the LVIA, the Outline Landscape and Ecology Management Plan <b>[APP-210]</b> and the Work Plans <b>[APP-006]</b> illustrate the areas near to settlements proposed as Mitigation and Enhancement Areas and detail how the retained and new planting proposed will be managed.</p>
Cumulative Impacts	Health and wellbeing	The point of walking is to take in natural beauty and boost mental and physical health and wellbeing.	<p>The Design and Access Statement <b>[APP-204]</b> sets out how the design of the proposed development has responded to its context, including the design guidance applied to ProW, where the Applicant has sought to minimize impacts to ProWs through mitigation and set-offs.</p> <p>An Amenity and Recreation Assessment was undertaken and is presented in the ES Chapter 6 Appendix 6.5 <b>[APP-058]</b> which concluded that whilst impacts to ProW within the Solar PV site during construction would be significant, operation impacts would not be significant following mitigation post 15 years when mitigation planting has matured. In relation to the two PRowS within the Solar PV Site</p>

			<p>where this is not the case (Bridleways E169 and E182) offsets of at least 15m are proposed along with new planting so that overtime the impact on the recreational amenity of these routes will reduce (although still acknowledged to be significant in LVIA terms).</p>
Land Use and Soils	Loss of productive/arable land	Loss of productive agricultural land when the push should be to use rooftop area.	<p>It is agreed that more rooftops should be used to help deliver more low carbon electricity within the UK, however, in order to reach the government targets (such as those identified in Net Zero Strategy and Powering Up Britain), utility scale solar is required to be delivered.</p> <p><b>Section 7.6</b> of the <b>Statement of Need [APP-202]</b> analyses the potential contribution of “brownfield” solar sites to the national need for solar generation. Brownfield sites, including rooftop and other community energy systems, are likely to grow in the UK and will make a contribution to decarbonisation of the UK energy system. However the <b>Statement of Need</b> concludes that on their own, brownfield developments are unlikely to be able to meet the national need for solar. <b>Section 8.5</b> of the <b>Statement of Need</b> describes and agrees with Government’s view that decentralised and community energy systems are unlikely to lead to the significant replacement of large-scale infrastructure. It is the Applicant’s view (and this aligns with Government’s view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation. This was re-acknowledged by the Government in its policy documentation published at the end of March 2023.</p>

			Section 2.4 of the Planning Statement <b>[APP-203]</b> explains the Applicant's position in respect of agricultural land.
Construction	Impact of construction on local area	Concern also of the massive construction phase impact locally.	<p>Construction vehicles will only use the permitted routes to access the Order Limits. This will be secured by way of requirement in the DCO through the final CTMP. Breaching the requirements of the DCO is a criminal offence. These routes are described in detail within the oCTMP <b>[APP-212]</b></p> <p>Condition surveys will be undertaken to determine the state of the existing highway, the scope of which will be agreed with RCC and LCC. The Applicant will repair any damaged highways as a result of construction traffic to a standard set out in the pre-construction surveys. Enabling works will also be provided at the access points across the Order limits to upgrade the existing access points to an appropriate standard.</p> <p>Further details of the mitigation measures for managing construction traffic can be found within the oCTMP. <b>[APP-212]</b>.</p> <p>Construction measures more generally will be mitigated through the measures set out in the oCEMP <b>[APP-207]</b>.</p>

**CPRE Lincolnshire (RR-0204)**

Topic	Theme	Statutory Consultee Comment	MPSF Response
Landscape and visual	Impact on countryside landscape	Its projected negative impact on the countryside landscape and surrounding productive agricultural land	<p>The potential impacts to the landscape and visual resource, has been comprehensively assessed in accordance with best practice guidance and informed by consultation with stakeholders.</p> <p>The results of this assessment are set out in detail within the LVIA [APP-036] and concluded that only limited residual significant effects will arise.</p> <p>The Design and Access Statement [APP-204] sets out how the design of the proposed development has responded to its context, including the design guidance applied to ProW and accounting for nearby settlements.</p> <p>The agricultural land will not be lost. The great majority of the land will not be permanently affected as an agricultural resource by the installation of panels as part of the Proposed Development. An assessment of the areas affected by tracks, solar stations and the substation is set out in the ES Chapter 12 at Table 12-6 [APP-114]. The area extends to 14.4ha, of which 0.5ha is Grade 2 and 3.7ha is sub-grade 3a land within the Best and Most Versatile agricultural land definition.</p>
Landscape and visual	Impact on the character	Its scale is inappropriate to the character and construct of the parishes it impacts	The potential impacts to the landscape and visual resource, has been comprehensively assessed in accordance with best practice guidance and informed by consultation with stakeholders.



			<p>The results of this assessment are set out in detail within the LVIA <b>[APP-036]</b> and concluded that only limited residual significant effects will arise.</p> <p>The Design and Access Statement <b>[APP-204]</b> sets out how the design of the Proposed Development has responded to its context, including accounting for nearby settlements.</p>
Land use and Soil	Loss of productive agricultural land	It will lead to a loss of productive agricultural land and harm to valued wildlife	<p>Chapter 7: Ecology and Biodiversity, of the ES <b>[APP-037]</b>, presents the approach and findings of the assessment of potential impacts on Ecology and Biodiversity. This has concluded that there will not be any significant impacts to any ecological feature.</p> <p>The agricultural land will not be lost. The great majority of the land will not be permanently affected as an agricultural resource by the installation of panels as part of the Proposed Development and so will be returned to be agricultural use following decommissioning. An assessment of the areas affected by tracks, solar stations and the substation is set out in the ES Chapter 12 at Table 12-6 <b>[APP-114]</b>. The area extends to 14.4ha, of which 0.5ha is Grade 2 and 3.7ha is sub-grade 3a land within the Best and Most Versatile agricultural land definition.</p> <p>Consideration of the food production and economic implications of the use of the BMV land for the Proposed Development compared to the production from poorer quality land are set out in the ES at sections 12.4.83 and Table 12-11 <b>[APP-114]</b>.</p>
Ecology and Biodiversity	Biodiversity impact	Its biodiversity negative impact will be significant	Chapter 7: Ecology and Biodiversity, of the ES <b>[APP-037]</b> , presents the approach and findings of the

			assessment of potential impacts on Ecology and Biodiversity. This has concluded that there will not be any significant impacts to any ecological feature.
Community Benefit	Lack of community mandate	It has no mandate from the local community	The Applicant understands the strength of feeling within the community, and has designed the scheme to minimise the impacts to the local community, and to provide benefits. However, fundamentally, the Applicant is helping provide a response to urgent need for low carbon energy generation in the UK, as set out in the Statement of Need <b>[APP-202]</b> , and the Site Selection Assessment <b>[APP-203]</b> explains why the location of the Proposed Development is an appropriate site for a large scale solar project to form part of meeting that need.
Land and Property; Construction	Construction phases	Its construction phase involves an excessive property and land acquisition strategy.	The Applicant respectfully disagrees with this statement. The Applicant has applied a systematic approach to the identification and extent of land and rights required for the Proposed Development, as set out in the <b>Statement of Reasons [AS-009]</b> .

**CPRE Rutland – the Countryside Charity (RR-0205)**

Topic	Theme	Statutory Consultee Comment	MPSF Response
Statement of Need; Alternatives	Alternative options	CPRE Rutland is supportive of renewable sources of energy when of an appropriate scale, in an appropriate location, when in an efficient and scientifically proven format of generation and when they have the support of the local community. Offshore wind, small onshore turbines and commercial/domestic roof-mounted solar panels are the charity's preferred options.	<p><b>Section 3.3 of the Statement of Need [APP-202]</b> describes Government's view that large capacities of low-carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar".</p> <p><b>Section 7.6 of the Statement of Need [APP-202]</b> analyses the potential contribution of "brownfield" solar sites to the national need for solar generation. Brownfield sites, including rooftop and other community energy systems, are likely to grow in the UK and will make a contribution to decarbonisation of the UK energy system. However, the <b>Statement of Need</b> concludes that on their own, brownfield developments are unlikely to be able to meet the national need for solar.</p> <p><b>Section 8.5 of the Statement of Need</b> describes and agrees with Government's view that decentralised and community energy systems are unlikely to lead to the significant replacement of large-scale infrastructure. It is the Applicant's view (and this aligns with Government's view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p>
Landscape and visual	Impact on countryside landscape	Its projected negative impact on the countryside landscape and surrounding valuable productive agricultural land	The potential impacts to the landscape and visual resource, has been comprehensively assessed in

			<p>accordance with best practice guidance and informed by consultation with stakeholders.</p> <p>The results of this assessment are set out in detail within the LVIA <b>[APP-036]</b> and concluded that only limited residual significant effects will arise.</p> <p>The Design and Access Statement <b>[APP-204]</b> sets out how the design of the Proposed Development has responded to its context, including the Design Guidance applied to PRow and accounting for nearby settlements.</p> <p>The agricultural land will not be lost. The great majority of the land will not be permanently affected as an agricultural resource by the installation of panels as part of the Proposed Development and so will be returned to be agricultural use following decommissioning.</p> <p>An assessment of the areas affected by tracks, solar stations and the substation is set out in the ES Chapter 12 at Table 12-6 <b>[APP-114]</b>. The area extends to 14.4ha, of which 0.5ha is Grade 2 and 3.7ha is sub-grade 3a land within the Best and Most Versatile agricultural land definition.</p>
Landscape and visual	Impact on the character	Its scale is inappropriate to the character and construct of the rural neighbourhood	<p>The potential impacts to the landscape and visual resource, has been comprehensively assessed in accordance with best practice guidance and informed by consultation with stakeholders.</p> <p>The results of this assessment are set out in detail within the LVIA <b>[APP-036]</b> and concluded that only limited localised residual significant effects will arise.</p>

			The Design and Access Statement <b>[APP-204]</b> sets out how the design of the proposed development has responded to its context, including accounting for nearby settlements.
Statement of Need; Alternatives	Alternative options	It's the least productive and cost-effective form of renewable energy when compared with offshore wind	<b>Section 3.3</b> of the <b>Statement of Need [APP-202]</b> describes Government's view that large capacities of low-carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar". <b>Figure 10.4</b> of the <b>Statement of Need</b> shows that on a levelized cost of energy basis, large scale solar is already cheaper than offshore wind, and Government's projections are that it will remain cheaper in the future.
Planning Statement	Local planning policy	It is in conflict with the draft strategic policies of the emerging Rutland Local Plan	The Applicant has reviewed Rutland's New Local Plan – Planning for Rutland's Future Issues and Options Consultation (June 2022). At this stage of the plan-making process, the local plan is not yet a formal policy document, and therefore carries limited weight in planning decisions. Furthermore, it does not set out draft policies but instead asks questions around a series of objectives, with a further Regulation 18 and Regulation 19 stage still to be undertaken. Therefore, the Applicant has carried out a planning assessment in response to all relevant adopted policies within the Minerals Core Strategy & Development Control Policies DPD – adopted October 2010, Rutland Core Strategy DPD – adopted July 2011, Site Allocations and Policies DPD – adopted October 2014 and relevant Supplementary Planning documents as part of the DCO application, which can be found in Table 9 – Rutland County Council Local

			<p>Planning Policy – Table of Compliance, Appendix 3, within the Planning Statement <b>[APP-203]</b>.</p>
<p>Land use and Soil; Ecology and biodiversity</p>	<p>Loss of productive agricultural land</p>	<p>It will lead to a loss of productive agricultural land and harm to valued wildlife</p>	<p>The agricultural land will not be lost. The great majority of the land will not be permanently affected as an agricultural resource by the installation of panels as part of the Proposed Development. An assessment of the areas affected by tracks, solar stations and the substation is set out in the ES Chapter 12 at Table 12-6 <b>[APP-114]</b>. The area extends to 14.4ha, of which 0.5ha is Grade 2 and 3.7ha is sub-grade 3a land within the Best and Most Versatile agricultural land definition.</p> <p>An assessment of the food production and economic implications of the use of the BMV land for the Proposed Development compared to the production from poorer quality land are set out in the ES at sections 12.4.83 and Table 12-11 <b>[APP-114]</b>.</p> <p>Chapter 7: Ecology and Biodiversity, of the ES <b>[APP-037]</b>, presents the approach and findings of the assessment of potential impacts on Ecology and</p>

			Biodiversity. This has concluded that there will not be any significant impacts to any ecological feature.
Ecology and Biodiversity	Biodiversity impact	Its biodiversity negative impact will be significant	Chapter 7: Ecology and Biodiversity, of the ES [APP-037], presents the approach and findings of the assessment of potential impacts on Ecology and Biodiversity. This has concluded that there will not be any significant impacts to any ecological feature.
Community Benefit	Lack of community benefit	It has no mandate from the local community	The Applicant understands the strength of feeling within the community, and has designed the scheme to minimise the impacts to the local community, and to provide benefits. However, fundamentally, the Applicant is helping provide a response to urgent need for low carbon energy generation in the UK, as set out in the Statement of Need [APP-202] , and the Site Selection Assessment [APP-203] explains why the location of the Proposed Development is an appropriate site for a large scale solar project to form part of meeting that need.
Land and Property; Construction	Construction phases	Its construction phase involves an excessive property and land acquisition strategy.	The Applicant respectfully disagrees with this statement. The Applicant has applied a systematic approach to the identification and extent of land and rights required for the Proposed Development, as set out in the <b>Statement of Reasons [AS-009]</b> .

**CPRE – Cambridgeshire and Peterborough (RR-0203)**

Topic	Theme	Statutory Consultee Comment	MPSF Response
Planning Statement	National Planning Policy and Local Planning Policy	<p>The National Planning Policy Framework (NPPF) considers that renewable energy projects should be part of the Local Plan process, should not cause cumulative landscape or visual effects and that the only acceptable projects which are outside of Local Plan boundaries should be those supported by communities through the neighbourhood planning process.</p> <p>We are concerned that this project is and will remain inconsistent with the Local Planning policies of the affected local authorities.</p>	<p>As part of the application, both National and Local planning policy have been assessed against the Proposed Development, these are within the Planning Statement [APP-203]. Based on this assessment, the Applicant does not consider that the Proposed Development is inconsistent with the relevant Local Plans.</p>
Land use and Soil	Loss of productive agricultural land; Food security	<p>Use of Agricultural Land Significant weight is given to protecting “best and most versatile” land from development by the NPPF.</p> <p>CPRE Cambs. &amp; P’boro. considers this proposal to be inconsistent with the NPPF in its use of good agricultural land.</p> <p>Food Security CPRE Cambs. &amp; P’boro. considers this proposal to be inconsistent with current national food security policy.</p>	<p>The Applicant has assessed its compliance with the NPPF and NPS on agricultural land in the Planning Statement [APP-203] and has concluded that it is not inconsistent with those policies in respect of agricultural land.</p> <p>Consideration of the food production and economic implications of the use of the BMV land for the Proposed Development compared to the production from poorer quality land are set out in the ES at sections 12.4.83 and Table 12-11[APP-114]. In short, the Applicant does not consider that the Proposed Development impacts upon food security, which is not in any event a matter of planning policy.</p>



			<p>The incremental reduction of crop production from the BMV land compared to non-BMV land is of the order of 250 tonnes (ES 12.4.84) from an annual production of 21million tonnes (ES 12.4.76).</p> <p>There are no policies or obligations to farm agricultural land in any particular farming manner or to any particular crop or stocking, see the ES Chapter 12 at 12.4.67 and 68.</p> <p>Agricultural use in the form of livestock grazing will continue under and around the panels, and on retained agricultural land.</p>
Statement of Need; Alternatives	Alternative options	Commercial Roof Space CPRE Cambs. & P'boro. consider that there are large areas of commercial roof space in the Peterborough area particularly which could be fitted with solar panels and any further take-up of agricultural land should be halted.	<p><b>Section 3.3</b> of the <b>Statement of Need [APP-202]</b> describes Government's view that large capacities of low-carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar".</p> <p><b>Section 7.6</b> of the <b>Statement of Need [APP-202]</b> analyses the potential contribution of "brownfield" solar sites to the national need for solar generation. Brownfield sites, including rooftop and other community energy systems, are likely to grow in the UK and will make a contribution to decarbonisation of the UK energy system. However the <b>Statement of Need</b> concludes that on their own, brownfield developments are unlikely to be able to meet the national need for solar. <b>Section 8.5</b> of the <b>Statement of Need</b> describes and agrees with Government's view that decentralised and community energy systems are unlikely to lead to the significant replacement of</p>

			<p>large-scale infrastructure. It is the Applicant's view (and this aligns with Government's view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p>
Highways and access	Construction Phase	<p>Transport CPRE Cambs. &amp; P'boro. are concerned by the effect of this development on local roads, particularly during the construction phase.</p>	<p>The construction traffic impact assessment is set out in ES Chapter 9 Highways and Access <b>[APP-039]</b>. The assessment identified that the Proposed Development will result in a negligible increase in traffic on the majority of the local network, with a 2% or lesser increase in the daily vehicle flows. Where there is a greater impact on Uffington Lane from increased numbers of HGVs, mitigation is proposed in the form of passing places and widening at the junction with the A6121 to help facilitate two-way HGV flows.</p> <p>Construction vehicles will also only use the permitted routes to access the Order limits. The routes to the primary construction compound are Routes 1 and 3 as shown on Figure 3-1 in the oCTMP <b>[APP-212]</b>. These routes have been selected as they form the most direct, suitable means of access to the Order Limits from the SRN, that are considered to be appropriate to accommodate HGV traffic given there is already an existing level of HGV traffic identified on these roads. Use of these roads exclusively will limit the impact on the wider road network, ensuring that only the roads identified as being suitable are used and in turn reducing any potential adverse effects. This will be secured by way of requirement in the DCO through the final CTMP. Breaching the requirements of the DCO is a criminal offence.</p> <p>The assessment within ES Chapter 9 concludes that the highway and access effects would be negligible.</p>

Glint and Glare	Health and safety during Construction	The proposed sites lie on both sides of the East Coast main railway line, we are very concerned that the risk of accidental issues will be increased by this development.	<p>A Glint and Glare Assessment is provided at Appendix 15.3 of the ES, which assesses the likely impacts of the development upon receptors <b>[APP-0104]</b>. The modelling has shown that solar reflections towards the railway line are predicted to be significantly obstructed by existing and proposed screening or occur from outside of a train driver's primary field of view (30 degrees either side of the direction of travel). Solar reflections towards approximately 100m of railway line occur from within a train driver's primary field of view which requires further consideration. However, mitigation is not required for this section of railway line because:</p> <ul style="list-style-type: none"> <li>a. No views of railway signals, stations, level crossings, or switching points is required, suggesting that the workload of a train driver will be low;</li> <li>b. The distance between the observer and the closest reflecting panel area is such that the proportion of an observer's field of vision that is taken up by the reflecting area is significantly reduced; and</li> <li>c. Effects will coincide with direct sunlight, which is a far more significant source of light compared to a solar reflection.</li> </ul>
Landscape and visual; Design and access		Landscape & Design CPRE Cambs. & P'boro. has very real concerns for the local landscape in what is a largely unspoiled rural area. Ranks of solar panels will turn the current vibrant and gentle landscape into a dead area, visibly industrial and totally unnatural.	<p>The potential impacts to the landscape and visual resource, has been comprehensively assessed in accordance with best practice guidance and informed by consultation with stakeholders. The results of this assessment are set out in detail within the LVIA <b>[APP-036]</b>. To support the LVIA photomontages have been produced for year 1 and year 15 scenarios.</p>

			<p>The Design and Access Statement <b>[APP-204]</b> sets out how the design of the proposed development has responded to its context, including the design principles which have informed the design.</p> <p>The Applicant does not agree that the Proposed Development will lead to the industrialisation of the area. With the measures set out in the GI Strategy Plan within the oLEMP <b>[APP-210]</b> views of the Scheme will be broken up by the green infrastructure proposed to be put in place, such that it will not be seen as one large developed area.</p> <p>The character and appearance of the Order limits would change from arable farmland to a utility-scale solar PV development. However, due to landform and the framework of woodlands, treebelts and hedgerows proposed, the Solar PV Site would appear subdivided and compartmentalised. It is important to note, the characteristics of solar developments are very different to ‘traditional’ forms of energy generation and their ‘modular’ nature means that they can be sympathetically sited to avoid impacts to the landscape fabric minimising potential harm to the countryside.</p>
Design and Green Infrastructure Strategy	PRoW	<p>Public Rights of Way and Safety The sites are criss-crossed by a network of Public Rights of Way (PRoWs).</p> <p>It is promised that these will be retained during the life of the sites except for some during construction. CPRE Cambs. &amp; P’boro. is concerned by the effects upon views for those using the PRoW network</p>	<p>All existing public rights of way would be retained in their existing alignment as part of the proposed development and there would be no permanent closures or diversions to routes.</p> <p>Routes may be temporarily closed during periods of construction to allow plant and materials to access construction areas but this would be controlled by measures set out in the Outline construction environmental management plan <b>[APP-207]</b>.</p>

			<p>Furthermore, an Amenity and Recreation Assessment was undertaken and is presented in the ES Chapter 6 Appendix 6.5 <b>[APP-058]</b> which concluded that whilst impacts to PRow within the site during construction would be significant, operation impacts would not be significant following mitigation post 15 years when mitigation planting has matured. In relation to the two PRowS within the Solar PV Site where this is not the case (Bridleways E169 and E182) offsets of at least 15m are proposed along with new planting so that overtime the impact on the recreational amenity of these routes will reduce (although still acknowledged to be significant in LVIA terms).</p> <p>The Design and Access Statement <b>[APP-204]</b> sets out how the design of the Proposed Development has responded to its context, including the Design Guidance applied to PRow.</p>
Management Plans	Decommissioning	<p>Decommissioning and Sustainability</p> <p>Currently, there is no recognised process for the recycling of waste solar panels. CPRE Cambs. &amp; P'boro. considers that a guaranteed decommissioning fund be should be lodged independently in escrow to ensure that there will be sufficient resources for decommissioning in 40 years time.</p>	<p>An Outline decommissioning environmental management plan <b>[APP-209]</b> has been prepared in support of the DCO. The overall responsibility for implementation of the DEMP (s) will lie with the appointed principal decommissioning contractor as a contractual responsibility to the Applicant, as the Applicant is ultimately responsible for compliance with the DCO. All the solar infrastructure, including PV Modules, Onsite Substation, Mounting Structures, cabling on or near the surface, Inverters, Transformers, Switchgear, fencing and ancillary infrastructure, would be removed and recycled or</p>

		<p>Without a robust carbon lifecycle analysis, the development cannot be said to be sustainable.</p>	<p>disposed of in accordance with good practice following the waste hierarchy, with materials being reused or recycled wherever possible. All waste will be disposed of in accordance with the legislation at the time of decommissioning.</p> <p>Solar is a low-carbon electricity generation technology. <b>Figure 7.3</b> of the <b>Statement of Need [APP-202]</b> shows the cumulative carbon emissions saved by solar generation versus the case that the electricity generated by solar was instead generated by Combined Cycle Gas Turbines (which emit carbon at a rate of 394 gCO<sub>2</sub>/kWh). The IPCC estimate of lifetime emissions of 48 kgCO<sub>2</sub>eq/MWh for utility scale solar generation (based on the median value from a range of 8 to 180 kgCO<sub>2</sub>e/MWh), includes embedded emissions in materials and the construction phase which has been taken into account in the Applicant's assessment.</p> <p><b>Figure 7.3</b> shows that carbon emissions from electricity generation would be higher if solar developments did not come forwards at the rate that National Grid project is required, than they would be if solar development follows National Grid's projections.</p> <p>In addition to the <b>Statement of Need [APP-202]</b>, the application was accompanied by a Climate Change assessment at Chapter 13 of the ES <b>[APP-043]</b>. This took a very conservative approach to the Green House Gas (GHG) effects of the Proposed Development and concluded (at paragraph 13.4.18) that the CO<sub>2</sub> emissions of the Proposed Development would be displaced within approximately 10.5 years, and all savings beyond that</p>
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			<p>would be a net benefit of the Proposed Development to reducing climate change, relative to the baseline. Over 40 years, for example, the saving is estimated at approximately 1.9 million tonnes of CO<sub>2</sub>. This assessment took into account the CO<sub>2</sub> involved in the production of panels and components, construction and decommissioning of the solar farm.</p>
Planning Statement	National Planning Policy and Local Planning Policy	This proposal is not compliant with national planning policy. This proposal may not be compliant with local planning policy.	As part of the application, both National and Local planning policy have been assessment against the Proposed Development, these are within the Planning Statement <b>[APP-203]</b> and concludes that the Scheme is consistent with these policies.
Land use and Soil	Loss of productive agricultural land; Food security	<p>This proposal will take out of production a large area of good agricultural land currently used for growing valuable food crops.</p> <p>This proposal is inconsistent with required responses to the national and international issue of dwindling food supply due to climate change and conflict as being currently experienced by UK consumers.</p> <p>This proposal is in direct opposition to the advice of the Environmental Audit Committee to government to increase the proportion of food grown within the UK.</p>	<p>Consideration of the food production and economic implications of the use of the BMV land for the Proposed Development compared to the production from poorer quality land are set out in the ES at sections 12.4.83 and Table 12-11 <b>[APP-114]</b>. The incremental reduction of crop production from the BMV land compared to non-BMV land is of the order of 250 tonnes (ES 12.4.84) from an annual production of 21million tonnes (ES 12.4.76). In short, the Proposed Development is not a risk to food security, which is in any event not a matter of planning policy.</p> <p>There are no policies or obligations to farm agricultural land in any particular farming manner or to any particular crop or stocking, see the ES Chapter 12 at 12.4.67 and 68.</p> <p>Agricultural use in the form of livestock grazing will continue under and around the panels, and on retained agricultural land.</p>

Socio-economic Impacts	Impact on local businesses	There will be significant harm to local agricultural businesses, especially those which may be made the subject of compulsory purchase	<p>Chapter 12 of the ES <b>[APP-042]</b> concludes that no significant effects arise to local agricultural businesses as a result of the Proposed Development.</p> <p>It is further noted that all agricultural businesses are seeking to agree voluntary options with the Applicant.</p>
Landscape and visual	Impact on residential and visual amenity	There will be significant adverse impact on residential and visual amenity.	<p>The potential impacts to the landscape and visual resource, including settlements has been comprehensively assessed in accordance with best practice guidance and informed by consultation with stakeholders.</p> <p>The results of this assessment are set out in detail within the LVIA <b>[APP-036]</b> with only limited localised residual significant effects identified</p> <p>To support the LVIA photomontages have been produced for year 1 and year 15 scenarios.</p> <p>Furthermore, a Residential Visual Amenity Assessment (RVAA) has been undertaken considering potential impacts to dwellings in close proximity to the Order limits <b>[APP-057]</b> which concludes that the Residential Visual Amenity Threshold is not broken for any dwelling</p> <p>The Design and Access Statement <b>[APP-204]</b> sets out how the design of the Proposed Development has responded to its context, including the design which has informed the approach taken to residential dwellings providing a bespoke response to each.</p>



			<p>The Green Infrastructure Strategy Plan <b>[APP-173]</b>, Figure 6.11 of the LVIA <b>[APP-036]</b>, the Outline Landscape and Ecology Management Plan <b>[APP-210]</b> and the Work Plans <b>[APP-006]</b> illustrate the areas near to settlements proposed as Mitigation and Enhancement Areas and detail how the retained and new planting proposed will be managed.</p>
Highways and access	Construction Phase	This proposal will have a cumulative effect on local roads.	<p>The construction traffic impact assessment for the Proposed Development is set out in ES Chapter 9 Highways and Access <b>[APP-039]</b>.</p> <p>From a Highways and Access perspective, there are no relevant existing or approved developments to consider in relation to the cumulative effects from the Proposed Development due to the limited overlap in construction programme and construction vehicle routing.</p> <p>In any event, the traffic associated with any cumulative developments would be accounted for within the TEMPRO growth factors and assessment undertaken in the for the future year 2026 scenario.</p> <p>In terms of the actual impacts of the Proposed Development itself, the construction traffic impact assessment in ES Chapter 9 identified that the Proposed Development will result in a negligible increase in traffic on the majority of the local network, with a 2% or lesser increase in the daily vehicle flows. Where there is a greater impact on Uffington Lane from increased numbers of HGVs, mitigation is proposed in the form of passing places and widening</p>

			<p>at the junction with the A6121 to help facilitate two-way HGV flows.</p> <p>The assessment within ES Chapter 9 concludes that the highway and access effects of the Proposed Development will be negligible.</p>
Design and Green Infrastructure Strategy	PRoW	There will be increased risks to the safety of walkers and riders using the existing Public Rights of Way.	<p>All existing public rights of way would be retained in their existing alignment as part of the Proposed Development and there would be no permanent closures or diversions to routes.</p> <p>Routes may be temporarily closed during periods of construction to allow plant and materials to access construction areas but this would be controlled by measures set out in the Outline construction environmental management plan <b>[APP-207]</b>.</p> <p>In accordance with the outline Construction Environmental Management Plan <b>[APP-207]</b> access to all existing PRoW will be retained during the construction phase, with a limited number of temporary PRoW diversions to allow the construction of access tracks where they cross PRoW. The PRoW will be managed throughout the construction phase to ensure that they can continue to be used safely.</p>
Design and Green Infrastructure Strategy	Impacts on landscape	There will be unacceptable levels of harm to local landscapes and to views across the countryside and significant harm to the historic landscape pattern.	<p>The potential impacts to the landscape and visual resource, has been comprehensively assessed in accordance with best practice guidance and informed by consultation with stakeholders.</p> <p>The results of this assessment are set out in detail within the LVIA <b>[APP-036]</b> with only limited localised residual significant effects identified.</p>

			<p>The Design and Access Statement <b>[APP-204]</b> sets out how the design of the Proposed Development has responded to its context, including the Design Principles which have informed the design.</p> <p>The Green Infrastructure Strategy Plan <b>[APP-173]</b>, Figure 6.11 of the LVIA <b>[APP-036]</b> the Outline Landscape and Ecology Management Plan <b>[APP-210]</b> and the Work Plans <b>[APP-006]</b> illustrate the areas near to settlements proposed as Mitigation and Enhancement Areas and detail how the retained and new planting proposed will be managed. The existing landscape fabric of hedgerows and tree belts will be enhanced by new planting and management as set out within the Outline Landscape and Ecology Management Plan <b>[APP-210]</b>.</p> <p>No effects are identified to any 'historic landscapes' as a result of the Proposed Development.</p>
Management Plans	Decommissioning	<p>There is no detailed, sustainable plan for the safe decommissioning of the site and the recycling or re-use of the materials removed because no recycling process for solar panels exists. A decommissioning fund must be available, sufficient and placed in escrow in advance of any construction commencing. A full carbon lifecycle analysis must be carried out for this installation, without which it cannot be claimed to be sustainable.</p>	<p>An Outline decommissioning environmental management plan <b>[APP-209]</b> has been prepared in support of the DCO. The detailed DEMP (s) will be produced for the Proposed Development in accordance the DCO Requirements prior to commencing decommissioning, which will be required to be substantially in accordance with the oDEMP submitted as part of the DCO Application. The overall responsibility for implementation of the DEMP (s) will lie with the appointed principal decommissioning contractor as a contractual responsibility to the Applicant, as the Applicant is ultimately responsible for compliance with the DCO. All the solar infrastructure, including PV Modules, Onsite Substation, Mounting Structures, cabling on or near</p>

			<p>the surface, Inverters, Transformers, Switchgear, fencing and ancillary infrastructure, would be removed and recycled or disposed of in accordance with good practice following the waste hierarchy, with materials being reused or recycled wherever possible. All waste will be disposed of in accordance with the legislation at the time of decommissioning.</p>
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**Essendine Village Hall (RR-0330)**

Topic	Theme	Statutory Consultee Comment	MPSF Response
Land and property	Compulsory acquisition rights	Compulsory acquisition rights over the village hall land should be refused, as should this application!	<p>The Applicant does not propose to compulsorily acquire the Parish Council's interests in Essendine Village Hall.</p> <p>The Parish Council are identified as holding an interest in plot 02-087, being Bourne Road, which is part of the cable corridor through Essendine Village. The Parish Council's interest in this plot is listed as the title to this land is unregistered, and as a highway, it is therefore <i>presumed</i> (which is a rebuttable presumption) that the Parish Council hold an interest in the land underneath the highway under the 'ad medium filum' rule. It is this subsoil which is sought to be subject to the compulsory acquisition of rights for the cable corridor.</p> <p>The impacts to the Parish Council are therefore minimal, however the Applicant is willing to discuss them with the Parish Council.</p>
Design	Visual impacts	Essendine will be surrounded by solar panels, security fencing and lights.	<p>The potential impacts to the landscape and visual resource, has been comprehensively assessed in accordance with best practice guidance and informed by consultation with stakeholders.</p> <p>The results of this assessment are set out in detail within the LVIA [APP-036], with limited localised residual significant effects</p>

			<p>Furthermore, a Residential Visual Amenity Assessment (RVAA) has been undertaken considering potential impacts to dwellings in close proximity to the site <b>[APP-057]</b> with the Residential Amenity Threshold assessed not to be broken for any dwellings</p> <p>The Design and Access Statement <b>[APP-204]</b> sets out how the design of the Proposed Development has responded to its context, including the Design Principles which have informed the design, including specific measures for fencing and lighting to minimise potential impacts.</p> <p>The Green Infrastructure Strategy Plan <b>[APP-173]</b>, Figure 6.11 of the LVIA <b>[APP-036]</b>, the Outline Landscape and Ecology Management Plan <b>[APP-210]</b> and the Work Plans <b>[APP-006]</b> illustrate the areas near to settlements proposed as Mitigation and Enhancement Areas and detail how the retained and new planting proposed will be managed.</p>
Landscape and Visual	Impact on the landscape character	These panels will ruin this rural area, which was the reason many of us chose to live here!	<p>The potential impacts to the landscape and visual resource, has been comprehensively assessed in accordance with best practice guidance and informed by consultation with stakeholders.</p> <p>The results of this assessment are set out in detail within the LVIA <b>[APP-036]</b> and based upon them, the Applicant does not consider that the Proposed Development will 'ruin the rural area'.</p> <p>The Design and Access Statement <b>[APP-204]</b> sets out how the design of the Proposed Development has</p>

			<p>responded to its specific context, including the Design Principles which have informed the design.</p> <p>The Green Infrastructure Strategy Plan [APP-173], Figure 6.11 of the LVIA [APP-036], the Outline Landscape and Ecology Management Plan [APP-210] and the Work Plans [APP-006] illustrate the areas near to settlements proposed as Mitigation and Enhancement Areas and detail how the retained and new planting proposed will be managed.</p>
Land use and Soil	Loss of productive agricultural land	Solar panels like this are inefficient and will be located on prime agricultural cereal growing land. We need food security and using good growing land is not helping an increasingly difficult supply situation.	<p>Consideration of the food production and economic implications of the use of the BMV land for the Proposed Development compared to the production from poorer quality land are set out in the ES at sections 12.4.83 and Table 12-11 [APP-114]. The incremental reduction of crop production from the BMV land compared to non-BMV land is of the order of 250 tonnes (ES 12.4.84) from an annual production of 21million tonnes (ES 12.4.76).</p> <p>There are no policies or obligations to farm agricultural land in any particular farming manner or to any particular crop or stocking, see the ES Chapter 12 at 12.4.67 and 68.</p> <p>Agricultural use in the form of livestock grazing will continue under and around the panels, and on retained agricultural land.</p>
Statement of Need; Alternatives	Alternative options	Solar panels need to be on roofs of all houses and industrial buildings. There is no place for this solar farm in this or any other area!	<p><b>Section 3.3</b> of the <b>Statement of Need [APP-202]</b> describes Government’s view that large capacities of low-carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that “a secure, reliable,</p>

			<p>affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar”.</p> <p><b>Section 7.6</b> of the <b>Statement of Need [APP-202]</b> analyses the potential contribution of “brownfield” solar sites to the national need for solar generation. Brownfield sites, including rooftop and other community energy systems, are likely to grow in the UK and will make a contribution to decarbonisation of the UK energy system. However the <b>Statement of Need</b> concludes that on their own, brownfield developments are unlikely to be able to meet the national need for solar. <b>Section 8.5</b> of the <b>Statement of Need</b> describes and agrees with Government’s view that decentralised and community energy systems are unlikely to lead to the significant replacement of large-scale infrastructure. It is the Applicant’s view (and this aligns with Government’s view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p>
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**APPENDIX 5 - APPLICANT'S RESPONSES TO THE 1177 RELEVANT REPRESENTATIONS FROM MEMBERS OF THE PUBLIC AND BUSINESSES.**

**Response to public relevant representations by topic**

Land Use and Soils

Topic	Theme	Summary of points raised	RR reference	MPSF's Response
Land Use and Soils	Agricultural Land	Concern about the loss of agricultural land as a result of the Proposed Development.	<p>RR-0245, RR-0314, RR-0424, RR-0500, RR-0052, RR-0336, RR-0370, RR-0421, RR-0484, RR-0543, RR-0691, RR-0850, RR-1154, RR-0267, RR-0639, RR-0846, RR-1061, RR-1083, RR-1134, RR-1136, RR-1145, RR-0482, RR-0699, RR-0158, RR-0471, RR-0017, RR-0692, RR-0969, RR-1057, RR-1072, RR-1215, RR-0152, RR-0841, RR-1030, RR-0584, RR-0711, RR-0518, RR-0740, RR-0964, RR-1065, RR-0578, RR-0908, RR-0789, RR-0366, RR-0581, RR-0718, RR-1086, RR-0507, RR-0680, RR-1011, RR-0511, RR-0710, RR-0685, RR-0727, RR-11995, RR-0144, RR-0459, RR-0679, RR-1161, RR-0050, RR-0037, RR-0233, RR-0664, RR-0883, RR-0165, RR-1193, RR-0285, RR-1070, RR-0372</p> <p>RR-0043, RR-0767, RR-0134, RR-0182, RR-0183, RR-0194, RR-0759, RR-0333, RR-0408, RR-0454, RR-0397, RR-0469, RR-0467, RR-0524, RR-0622, RR-0771, RR-1155, RR-1020, RR-0885, RR-0880, RR-0867, RR-0854, RR-0831, 0830, RR-0828, RR-0818, RR-0809, RR-0799, RR-0790, RR-0721, RR-0715, RR-0677, RR-0625, RR-0621, RR-0607, RR-0585, RR-0588, RR-0577, RR-0576, RR-0570, RR-0486, RR-</p>	<p>The great majority of the land will not be affected by the installation of panels as part of the Proposed Development. An assessment of the areas affected by tracks, solar stations and the substation is set out in the ES Chapter 12 at Table 12-6 [APP-114]. The area extends to 0.5ha of Grade 2 and 3.7ha of sub-grade 3a land within the Best and Most Versatile agricultural land definition.</p> <p>The calculation of the area affected by the substation includes a larger area than the footprint, and the actual area involved is smaller, ES 12.4.45 [APP-114].</p> <p>The areas affected by tracks and solar station areas are capable of being restored to comparable agricultural use and quality at decommissioning but again a precautionary approach has been taken in the assessment and these areas have been included as potentially lost to agricultural use, ES paragraph 12.4.16 to 18 [APP-114].</p>

Topic	Theme	Summary of points raised	RR reference	MPSF's Response
			<p>0465,RR-0454, RR-0452, RR-0448, RR-0436, RR-0425, RR-0407, RR-0397, RR-0332, RR-0301, RR-0277, RR-0275, RR-0240 , RR-0202, RR-0057, RR-0048,</p> <p>RR-1197, RR-1221, RR-1201, RR-1183, RR-1149, RR-1143, RR-1169, RR-1167, RR-1132, RR-1059</p> <p>RR-1049, RR-0980, RR-0967, RR-0937, RR-0929, RR-0234, RR-0232, RR- 0202, RR-0182, RR-0178, RR-0157, RR-0155, RR-0083, RR-0057, RR-0043,</p>	
Land Use and Soils	Agricultural Land	Concern about the loss of agricultural land, resulting in a reduction in crop which impacts the feed for surrounding species (including birds).	<p>RR-0052, RR-0652, RR-1113, RR-0998, RR-1010, RR-0040, RR-0034</p> <p>RR-0767, RR-0182, RR-0183, RR-1020</p> <p>RR-1223. RR-1169, RR-1149, RR-1143 RR-032</p> <p>RR-021</p>	<p>The extent of the design of the Proposed Development retains the majority of the Habitats of Principal Importance within the Order limits, as set out in Section 7.5 of Ecology and Biodiversity chapter of the ES [APP-037]. Where arable land is replaced with hard standing (for example access tracks and Solar Stations), this represents a minor loss in terms of ecological value and is likely to be an adverse effect of significance at a Site level only. However, where arable land is replaced with other habitats such as grassland (even in the case of grazed permanent grassland with a moderate species diversity) the effect is likely to be an overall beneficial effect of significance at a District level. The habitat creation and enhancements will</p>

Topic	Theme	Summary of points raised	RR reference	MPSF's Response
				likely increase the amount of foraging habitat for bats, badgers, hedgehog, brown hare, harvest mouse, reptiles, amphibians and invertebrates. Measures will be put in place to enhance the value of retained arable habitats for bird nesting as secured through the Outline Landscape and Ecological Management Plan (oLEMP) [APP-210].
Land Use and Soils	Agricultural Land	Concern that this agricultural land will be lost forever, there will be no future use and will instead be classified as a brownfield site.	RR-0707, RR-1113, RR-0005, RR-0336, RR-0039, RR-0129, RR-1122, RR-1142, RR-0094, RR-140, RR-0405, RR-0973, RR-0280, RR-0215, RR-0410, RR-0865, RR-0071, RR-1168, RR-0071, RR-1168, RR-0420, RR-0894, RR-0388, RR-0250, RR-0629, RR-1066, RR-1149	The Solar PV Site and Onsite Substation would be reinstated to agricultural land in accordance with a Decommissioning Environmental Management Plan (DEMP) (which will include a Soil Management Plan), as will access tracks unless otherwise agreed by landowners. The DEMP will be required to be in accordance with the outline Decommissioning Environmental Management Plan (oDEMP) [APP-209] which has been prepared to support the DCO Application. As such, there will be no permanent loss of agricultural land.
Land Use and Soils	Agricultural Land	Concern about the loss of agricultural land as a result of the Proposed Development, particularly given that this could challenge the UK's ability to be self-sufficient in terms of food production.	RR-0553, RR-1035, RR-0082, RR-0290, RR-0384, RR-0005, RR-0187, RR-0336, RR-0501, RR-0638, RR-0672, RR-0860, RR-0900, RR-0353, RR-0756, RR-0879, RR-0313, RR-0653, RR-0748, RR-0022, RR-0070, RR-0139, RR-0481, RR-0848, RR-0892, RR-1032, RR-1099, RR-0061, RR-0321, RR-1042, RR-0074, RR-0502, RR-0777, RR-0326, RR-0410, RR-1175, RR-0852, RR-0793, RR-0121, RR-0066, RR-0538, RR-0559, RR-0572, RR-0716, RR-0758, RR-0761, RR-0103, RR-0143, RR-	The agricultural land will not be lost. The great majority of the land will not be affected by the installation of panels as part of the Proposed Development. An assessment of the areas affected by tracks, solar stations and the substation is set out in the ES Chapter 12 at Table 12-6 [APP-114]. The area extends to 0.5ha of Grade 2 and 3.7ha of sub-grade 3a land within the Best and Most Versatile agricultural land definition.  Consideration of the food production and economic implications of the use of the BMV land for the

Topic	Theme	Summary of points raised	RR reference	MPSF's Response
			<p>0950, RR-0191, RR-1097, RR-0631, RR-0675, RR-0340, RR-0942, RR-1118, RR-0462, RR-0536, RR-0797.</p> <p>RR-0397, RR-0408, RR-0454, RR-0467, RR-0771, RR-0752, RR-1132, RR-0834, RR-0979, RR-1100, RR-1149</p>	<p>Proposed Development compared to the production from poorer quality land are set out in the ES at sections 12.4.83 and Table 12-11 [APP-114]. In short, the Applicant considers that the Proposed Development does not impact upon food security. The Applicant considers that following the analysis in the Planning Statement [APP-203], it is consistent with government policy on agricultural land.</p> <p>The land is not lost, except for the small areas noted above, and therefore there is no cumulative effect on agricultural land, as set out in the ES Chapter 12 at 12.8 [APP042].</p> <p>The Applicant considers that it is consistent with national policy on agricultural land, as set out in the Planning Statement [APP-203].</p>
Land Use and Soils	Agricultural Land	Concern that the agricultural land is being misused and should be used for a different type of scheme where the land will not be long-term affected or it must remain as agricultural land.	<p>RR-0092, RR-0173, RR-0597, RR-0590, RR-1090, RR-0055, RR-0230, RR-0295, RR-0512, RR-0723, RR-0744, RR-0845, RR-0957, RR-1088, RR-1147, RR-0109, RR-0548, RR-0647, RR-0673, RR-0983, RR-1008, RR-0125, RR-1046, RR-1077, RR-0630, RR-0701, RR-0784, RR-0834, RR-0890, RR-0641, RR-0903, RR-1203, RR-0160, R-0487, RR-0682, RR-1103, RR-0595, RR-0015, RR-0440, RR-0514, RR-1166, RR-0654, RR-0786, RR-0816, RR-0075, RR-0249, RR-0600, RR-0618, RR-0905, RR-1115, RR-1156, RR-0517, R-0951, RR-0182,</p>	<p>The agricultural land will not be lost. The great majority of the land will not be affected by the installation of panels as part of the Proposed Development. An assessment of the areas affected by tracks, solar stations and the substation is set out in the ES Chapter 12 at Table 12-6 [APP-114]. The area extends to 0.5ha of Grade 2 and 3.7ha of sub-grade 3a land within the Best and Most Versatile agricultural land definition</p> <p>There are no policies or obligations to farm agricultural land in any particular farming manner or to any</p>

Topic	Theme	Summary of points raised	RR reference	MPSF's Response
			<p>RR-0863, RR-1028, RR-1210, RR-0229, RR-1192, RR-0737, RR-1159, RR-0101, RR-0079, RR-0429, RR-0480, RR-1048, RR-1209, RR-0090.</p> <p>RR-0759, RR-0397, RR-0408, RR-0454, RR-0467, RR-0752,</p> <p>RR-1132, RR-1106, RR-0621, RR-0546, RR-0465, RR-0425, RR-0235, RR-0048, RR-0020, RR-1139, RR-1100, RR-1093, RR-0228, RR-0027, RR-1190, RR-1003, RR-0970, RR-0825, RR-0787, RR-0535, RR-0489, RR-0489, RR-0444, R-0427, RR-0258, RR-0159, RR-0127,</p>	<p>particular crop or stocking, see the ES Chapter 12 at 12.4.67 and 68.</p> <p>Agricultural use in the form of livestock grazing will continue under and around the panels, and in retain agricultural land.</p> <p>Consideration of the food production and economic implications of the use of the BMV land for the Proposed Development compared to the production from poorer quality land is set out in the ES at sections 12.4.83 and Table 12-11 [APP-114]. In short, the Applicant considers that the Proposed Scheme does not impact on food security, which is in any event not a planning policy matter.</p>
Land Use and Soils	Agricultural Land	Concerns that the loss of farmland will not benefit the net zero levels will ultimately result in more imports which increases emission levels. The reason for this being that the loss of agricultural land will reduce levels of food production.	RR-0053, RR-0824, RR-0669, RR-0803, RR-0523.	<p>Consideration of the food production and economic implications of the use of the BMV land for the Proposed Development compared to the production from poorer quality land is set out in the ES at sections 12.4.83 and Table 12-11 [APP-114].</p> <p>The incremental reduction of crop production from the BMV land compared to non-BMV land is of the order of 250 tonnes (ES 12.4.84) from an annual production of 21million tonnes (ES 12.4.76).</p> <p>No agricultural business is expected to be lost as a result of the Proposed Development, as such the existing businesses will be able to continue in food production. The Applicant does not consider that it is possible or appropriate to draw, or assess, a specific</p>

Topic	Theme	Summary of points raised	RR reference	MPSF's Response
				link between the localised Proposed Scheme impacts and the national and global economic factors which drive the balance between imports and home-grown food supply in the UK.
Land Use and Soils	Agricultural Land	Concern that by reducing the level of arable agricultural land in the surrounding area, it will result in socio-economic impacts of members of the local community. Specifically, regarding the financial welfare of farmers.	RR-0454, RR-0397, RR-0752,	The economic implications (benefits) for local farms and the increased local farm labour needed for managing the sheep is set out in the ES Chapter 12 at paragraphs 12.4.96 and 12.4.97 [APP114] and no significant effects are expected to arise.
Land use and Soils	Agricultural Land	Concerns regarding the methodology around the surveying and testing of the land classified as the Best and Most Versatile land, in relation to National Policy Guidelines.	RR-0333, RR-0408, RR-1149	<p>The policy is considered in the ES Chapter 12 paragraph 12.1.2 [APP-042] and Appendix 12.1 [APP-088] and the Planning Statement [APP-203]. The Applicant considers it is in accordance with policy on this topic.</p> <p>No details are provided as to why the testing is stated to need revisiting, so a response is not possible. The ALC survey was carried out by highly skilled and experienced soil surveyors and is reported in the ES Appendix 12.4 [APP-091].</p>



Flood Risk

Topic	Theme	Summary of points raised	RR reference	MPSF's Response
Flood Risk	Increase in flood risk rates	Concern that the Proposed Development will result in an increase in flooding through the neighbouring villages.	<p>RR-0245, RR-0314, RR-0510, RR-0336, RR-0756, RR-0173, RR-0309, RR-0387, RR-0230, RR-0692, RR-0845, RR-0892, RR-1001, RR-1072, RR-0273, RR-0983, RR-0478, RR-1047, RR0784, RR-0578, RR-0031, RR-0015, RR-0075, RR-0507, RR-0600, RR-0327, RR-0328, RR-1115, RR-1217, RR-0815, RR-1055, RR-0965, RR-0304, RR-0120, RR-0669, RR-1000, RR-0191, RR-0894, RR-0675, RR-0996, RR-0693, RR-0285, RR-0480, RR-0447, RR-0686, RR-0665, RR-0286,</p> <p>RR-1180, RR-0433, RR-0437, RR-0632, RR-0733, RR-0389, RR-0445, RR-0681, RR-0901, RR-1043, RR-0195, RR-0196, RR-0315, RR-0702, RR-0837, RR-1184, RR-0361, RR-0365, RR-0606, RR-0775, RR-0800, RR-0842, RR-0887, RR-1094, RR-0489, RR-0499, RR-0516, RR-0596, RR-0759, RR-0877, RR-0970, RR-0988, RR-1006, RR-0035, RR-0354, RR-0400, RR-0956, RR-1040, RR-1151, RR-1163, RR-0020, RR-0043, RR-0240, RR-0296, RR-0369, RR-0397, RR-0546, RR-0651, RR-0677, RR-0690, RR-0799, RR-0923, RR-1201</p>	<p>An assessment of Flood Risk, including the management of surface water run-off rates, can be found within Appendix 11.5 of the Environmental Statement [APP-086] and Appendix 11.6: Outline Surface Water Drainage Strategy of the Environmental Statement [APP-087], which includes allowances for climate change.</p> <p>The Flood Risk Assessment states in Section 3 that the implementation of measures in the Outline Surface Water Drainage Strategy will prevent an increase in flood risk elsewhere in the area.</p> <p>Table 2 of Appendix 11.5 of the ES [APP-086] concludes that the residual risk of the Proposed Development flooding from all sources is negligible.</p>
Flood Risk	Increase Flood risk and surface run-off	Concern regarding the existing flood risks and a history of flooding within the area	<p>RR-0333, RR-0043, RR-0397, RR-0454, RR-1149, RR-0445, RR-0025, RR-0093, RR-0383, RR-0093, RR-0025, RR-0686, RR-0930, RR-0356, RR-0386, RR-0550, RR-0771, RR-1116, RR-0270, RR-0458, RR-0545, RR-0897, RR-0624, RR-1037, RR-1180, RR-0063, RR-0194, RR-0348, RR-0564, RR-1068, RR-0106, RR-0378, RR-0401, RR-0433, RR-0437,</p>	<p>The Applicant acknowledges the issues that have been raised by particular relevant representation.</p> <p>Section 1.8 <i>Historical Flooding</i> of the Flood Risk Assessment, Appendix 11.5 of the Environmental Statement [APP-086], states that anecdotal evidence during consultations indicates Greatford</p>



Topic	Theme	Summary of points raised	RR reference	MPSF's Response
			RR-0632, RR-0504, RR-0648, RR-0602, RR-1129, RR-0029, RR-0281, RR-0299, RR-0495, RR-0800, RR-0842, RR-0887, RR-0269, RR-0391, RR-0392, RR-0489, RR-0499, RR-0970, RR-0169, RR-0333, RR-0354, RR-0483, RR- 0565, RR-0944, RR-0968, RR-1139, RR-1181, RR-0275, RR-0454, RR-0607, RR-1038, RR-1059, RR-1149, RR-1221	<p>has been subject to surface water flooding over multiple years with recent events occurring in December 2020 and January 2021. The Order limits of the Proposed Development is not located in areas with a recorded previous flooding history.</p> <p>A Flood Risk Assessment has been undertaken and can be found in Appendix 11.5 of the Environmental Statement [APP-086] and in Section 1.8 <i>Historical Flooding</i> and Section 2.1 consideration is given to existing flood risks and the flooding history of the local area. The assessment also found that the implementation of measures from the Outline Surface Water Drainage Strategy (Appendix 11.6 of the ES [APP-087]) will prevent an increase in flood risk elsewhere in the area.</p> <p>The Drainage Strategy also includes information about the proposed management of surface water runoff rates from the Proposed Development including from panels and access tracks.</p> <p>Table 1-1 Summary of Mitigation Measures within the Outline Water Management Plan [APP-214] details that measures to prevent compaction of soil during construction, such as avoiding tracking over soils when too wet, are detailed in and secured by the Outline Soil Management Plan [APP-213].</p>
Flood Risk	Poor water absorption	Concern that construction works	RR-0652, RR-0143.	The potential effects of the Proposed Development on water resources and ground conditions are assessed in

Topic	Theme	Summary of points raised	RR reference	MPSF's Response
		will impact the ground, resulting in poor water absorption. This will result in further risk to flooding for the local area.		<p>Chapter 11 of the ES [APP-041] and at paragraph 11.4.60 it assessed the effect of the compaction of soil during construction and decommission phases to be negligible.</p> <p>Appendix 11.6: Outline Surface Water Drainage Strategy of the Environmental Statement [APP-087] describes how surface water run-off from all aspects of the Proposed Development will be managed, including the avoidance of unnecessary soil disturbance on saturated soils in order to minimise soil compaction.</p> <p>Table 1-1 Summary of Mitigation Measures within the Outline Water Management Plan [APP-214] details that measures to prevent compaction of soil during construction, such as avoiding tracking over soils when too wet, are detailed in and secured by the Outline Soil Management Plan [APP-213].</p>
Flood Risk	Concentration of water runoff	Surface runoff is concentrated from the proposed solar panels, this runoff will all go in one direction and increasing the flooding of River Glen. The water rate in the River Glen will cause rates of flooding into the	RR-0394, RR-1090, RR-1088, RR-0852, RR-1166, RR-0680, RR-1159, RR-1118.  RR-0043  RR-0271  RR-0474 RR-0400 RR-0095 RR-0553	<p>Section 3.1 of Appendix 11.6: Outline Surface Water Drainage Strategy of the Environmental Statement [APP-087] addresses how surface water will be managed from the PV arrays, including regular rainwater gaps between the panels to prevent water being concentrated along a single drip line and the use of managed grassland to slow surface water runoff.</p> <p>The Applicant has also undertaken a Flood Risk Assessment (Appendix 11.5 of the ES [APP-086]) and this states in Section 3 that the implementation of measures, such as the use of vegetation management, in the Outline Surface Water Drainage Strategy [APP-</p>

Topic	Theme	Summary of points raised	RR reference	MPSF's Response
		neighbouring railway tracks, villages etc.		<p><b>087]</b> will prevent an increase in flood risk elsewhere. This is evidenced in Section 3.1 of the Outline Surface Water Drainage Strategy of the Environmental Statement [<b>APP-087</b>] by the use of a 2D rainfall model. The model demonstrates that the proposed vegetation management will increase the interception potential of surface water within the Solar PV Site relative to the existing land use i.e. have a beneficial impact on surface water runoff rates draining to the West Glen River.</p>
Flood Risk	Impact on heritage assets	Concerns surrounding the potential impact of increased flooding on the local heritage assets	RR-0441, RR-0229. RR-0258 RR-0759, RR-0454	<p>Appendix 11.6: Outline Surface Water Drainage Strategy of the Environmental Statement [<b>APP-087</b>] states in Section 8 that “Following implementation of the surface water drainage measures detailed in this document the introduction of hard-standing associated with the Proposed Development will not lead to an increase in discharge rates above greenfield levels for a 1 in 100-year return period”.</p> <p>As such, the Proposed Development will not lead to a worsening of the baseline or future flooding situation offsite, including for local heritage assets.</p>
Flood Risk	Mitigation	Further information is required about mitigation measures which are to be included to limit any impact from increased flood risk on neighbouring properties and villages.	RR-0845, RR-0478, RR-0280, RR-0079.	<p>Appendix 11.6: Outline Surface Water Drainage Strategy of the Environmental Statement [<b>APP-087</b>] describes how surface water run-off from all aspects of the Proposed Development will be managed. The Flood Risk Assessment [<b>APP-086</b>] identifies that the installation of PV Arrays do not have the potential to significantly increase surface water runoff rates compared to the baseline scenario as vegetation under the drip lines establishes and acts to slow the transfer of run-off.</p>

Topic	Theme	Summary of points raised	RR reference	MPSF's Response
				<p>The PV array tables will have regular rainwater gaps between panels to prevent water being concentrated along a single drip line.</p> <p>Once the rainfall has fallen off a PV Table, the water will be able to spread and flow along the ground. Given the topography of the Order limits is generally flat lying it was assessed in Chapter 11 of the ES [APP-041] to be likely that rain falling on each row of solar panels would flow evenly into the rain-shadow of the row below, so as to mobilise the same percentage of the ground for infiltration as was available before the PV Arrays were installed. The area under the PV Arrays will be seeded with a suitable grass/flower mix to prevent rilling (incisions in soil caused by concentrated water flow) and an increase in surface water runoff rates. Areas of hardstanding (i.e., the Onsite Substation) will be served by a drainage system which incorporates Sustainable Drainage Systems (SuDS) mechanisms to prevent an increase in surface water runoff.</p> <p>All of these measures are outlined in the Outline Surface Water Drainage Strategy (Appendix 11.6 of the ES [APP-087]). The Applicant's Flood Risk Assessment (Appendix 11.5 of the ES [APP-086]) states in Section 3 that implementation of these measures will prevent an increase in flood risk elsewhere.</p> <p>Section 2.5 of the Outline Water Management Plan (oWMP) [APP-214] provides details on measures to be implemented during construction of the Proposed Development, such as track drainage, check dams etc. and states that detailed design and management of a</p>

Topic	Theme	Summary of points raised	RR reference	MPSF's Response
				drainage scheme compliant with SuDS principles, would be implemented by the construction contractor.

Landscape and Visual

Topic	Theme	Summary of points raised	RR reference	MPSF's Response
Landscape and Visual	Visual Impacts	Concerns that the Proposed Development results in an impact on the rural landscape and heighten visual changes to the surrounding area.	RR-0245, RR-0314, RR-0652, RR-0707, RR-0384, RR-0005, RR-0484, RR-1154, RR-0394, RR-1061, RR-1136, RR-0313, RR-0387, RR-0158, RR-0390, RR-1090, RR-0054, RR-0208, RR-0230, RR-0266, RR-0441, RR-0663, RR-0804, RR-0892, RR-0957, RR-0969, RR-1001, RR-1088, RR-0061, RR-0109, RR-0978, RR-0983, RR-0902, RR-1046, RR-1077, RR-1096, RR-0701, RR-0259, RR-0373, RR-0750, RR-0236, RR-0377, RR-0121, RR-0789, RR-0015, RR-0440, RR-0278, RR-0654, RR-0047, RR-0680, RR-1115, RR-1156, RR-1217, RR-0001, RR-0105, RR-0668, RR-0689, RR-076, RR-1055, RR-0416, RR-0120, RR-0143, RR- 0144, RR-0459, RR-1168, RR-0420, RR-1161, RR-0388, RR-0678, RR-0429, RR-0523, RR-1112, RR-0233, RR-0599, RR-0316, RR-1070, RR-1214, RR-0372, RR-1223, RR-1221, RR-1183, RR-1182, RR-1169, RR-1165, RR-1149, RR-1132, RR-1124, RR-1049, RR-1039, RR-1038, RR-1024, RR-0995, RR-0974, RR-0952, RR-0939, RR-0918, RR-0886, RR-0867, RR-0849, RR-0828, RR-0818, RR-0809, RR-0806, RR-0799, RR-0790, RR-0778, RR-0765, RR-0762, RR-0755, RR-0721, RR-0709, RR-0700, RR-0697, RR-0690, RR-0677, RR-0666, RR-0621, RR-0607, RR-0585, RR-0576, RR-0570, RR-0553, RR-0546, RR-0541, RR-0509, RR-0457, RR-0454, RR-0448, RR-0436, RR-0425, RR-0407, RR-0403, RR-0397, RR-0351, RR-0302, RR-0294, RR-0282, RR-0277, RR-0275, RR-0257, RR-0254, RR-0253, RR-0240, RR-0235, RR-0234, RR-0202, RR-0199, RR-0178, RR-0157, RR-0155, RR-0151, RR-0102, RR-0073, RR-0059, RR-0045,	<p>The potential landscape and visual effects have been comprehensively assessed in accordance with best practice guidance and informed by stakeholder consultation.</p> <p>The results of this assessment are set out in detail within the LVIA within Chapter 6 of the ES [APP-036].</p> <p>The potential for significant adverse effects to landscape character would be limited to extent of the Solar PV Site and local context (up to approximately 500m from the Solar PV Site boundary) for the two local landscape character areas (Rutland Plateau D(ii) Clay Woodlands and Kesteven Uplands) where there would be Major-Moderate adverse effects which are significant. Beyond the extent of the Solar PV Site and its immediate context, the effects on the wider landscape character are likely to reduce quickly with distance, and are likely to be minimal and not significant.</p> <p>Visual effects arising from the Proposed Development would be confined to within approximately 500m south, west and north and limited to visual receptors located within or in close proximity to the Solar PV Site and would experience Major-Moderate adverse effects which are significant however these would reduce over time as the proposed vegetation matures and provides further visual screening.</p> <p>For other visual receptor groups beyond the Solar PV Site impacts range from Moderate significance</p>



Topic	Theme	Summary of points raised	RR reference	MPSF's Response
			RR-0043, RR-0040, RR-0020, RR-0006, RR-1181, RR-1163, RR-1139, RR-1133, RR-1123, RR-1119, RR-1110, RR-1040, RR-1036, RR-1033, RR-1002, RR-0968, RR-0963, RR-0956, RR-0933, RR-0896, RR-0857, RR-0851, RR-0829, RR-0734, RR-0695, RR-0644, RR-0551, RR-0368, RR-0363, RR-0355, RR-0335, RR-0325, RR-0312, RR-0256, RR-0220, RR-0215, RR-0207, RR-0198, RR-0215, RR-0207, RR-0198, RR-0175, RR-0169, RR-0114, RR-0098, RR0064, RR-0027, RR-0016, RR-1206, RR-1190, RR-1173, RR-1109, RR-1064, RR-1003, RR-0977, RR-0970, RR-0938, RR-0931, RR-0907, RR-0853, RR-0779, RR-0759, RR-0728, RR-0717, RR-0611, RR-0596, RR-0589, RR-0558, RR-0515, RR-0499, RR-0453, RR-0444, RR-0427, RR-0392, RR-0391, RR-0357, RR-0341, RR-0310, RR-0269, RR-0268, RR-0258, RR-0159, RR-0095, RR-1137, RR-1114, RR-1027, RR-1025, RR-0946, RR-0898, RR-0887, RR-0878, RR-0866, RR-0847, RR-0843, RR-0842, RR-0800, RR-0724, RR-0703, RR-0661, RR-0658, RR-0643, RR-0587, RR-0586, RR-0562, RR-0531, RR-0525, RR-0519, RR-0495, RR-0479, RR-0474, RR-0419, RR-0365, RR-0364, RR-0361, RR-0317, RR-0299, RR-0255, RR-0212, RR-0179, RR-0170, RR-0123, RR-0111, RR-0029, RR-1213, RR-1199, RR-1184, RR-1177, RR-1158, RR-1153, RR-1062, RR-1044, RR-1031, RR-1023, RR-1012, RR-0906, RR-0881, RR-0837, RR-0742, RR-0702, RR-0659, RR-0636, RR-0615, RR-0603, RR-0602, RR-0552 RR-0484, RR-0393, RR-0358, RR-0196, RR-0195, RR-0166, RR-0164, RR-0154, RR-0141, RR-0104, RR-1205, RR-1138, RR-1043, RR-1022, RR-0991,	<p>reducing to Minimal (which are not significant), with all effects reducing over time as new planting matures and provides further visual screening.</p> <p>Views from Public Rights of Way (PRoW) outside of the Solar PV Site would change from views over fields to filtered views of the Proposed Development within the landscape or, for those adjacent to the Solar PV Site, views along GI corridors that simultaneously function to improve the landscape fabric by introducing new and enhanced hedgerows and tree belts. Adverse effects would be minimal and not significant.</p> <p>Over time, the scale of effects would generally reduce as the proposed vegetation establishes to gradually screen or filter views of the Solar PV Site and Onsite Substation in the long term by year 15. The landscape features within the Order limits will be subject to ongoing management to ensure the amenity and/or screening effects of this vegetation are achieved in the long term as detailed within the oLEMP [APP-210].</p>

Topic	Theme	Summary of points raised	RR reference	MPSF's Response
			RR-0996, RR-0738, RR-0681, RR-0637, RR-0445, RR-0389, RR-0274, RR-0150, RR-0081, RR-0058, RR-1101, RR-1092, RR-1067, RR-0994, RR-0889, RR-0798, RR-0426, RR-0433, RR-0409, RR-0401, RR-0378, RR-0322, RR-0307, RR-0306, RR-0305, RR-0298, RR-0293, RR-0292, RR-0265, RR-0239, RR-0106, RR-0072, RR-0014, RR-0004, RR-0719, RR-0408, RR-0348, RR-0209, RR-1013, RR-0563, RR-0505, RR-0136, RR-0130, RR-1144, RR-1021, RR-0568, RR-0385, RR-0271, RR-0162, RR-0063, RR-0011, RR-1180, RR-1050, RR-0030, RR-1056, RR-1037, RR-0897, RR-0624, RR-0545, RR-1116, RR-0811, RR-0771, RR-0550, RR-0386, RR-0356, RR-1058, RR-1014, RR-0961, RR-0930, RR-0921, RR-0844, RR-0795, RR-0649, RR-0490, RR-0473, RR-0383, RR-0221, RR-0217, RR-0147, RR-0051, RR-0025, RR-0981, RR-0665, RR-0493, RR-0747, RR-1179, RR-1107, RR-0571, RR-0527, RR-0455, RR-0412.  RR-0019, RR-0043, RR-0767, RR-0397, RR-0408, RR-0432, RR-0454, RR-0291, RR-0472, RR-0569, RR-0771, RR-1020, RR-1149	
Landscape and Visual	Visual Impacts	Concern that the Proposed Development will result in visual impacts for those properties neighbouring the unit.	RR-0284, RR-0713, RR-0879, RR-0744, RR-0223, RR-0815.  RR-0045, RR-0043, RR-0137, RR-0194, RR-0266, RR-0759, RR-0333, RR-0432, RR-0454, RR-0397, RR-0771, RR-1091,	A Residential Visual Amenity Assessment (RVAA) [APP-057] has been undertaken as Appendix 6.4 of the ES to consider the potential impacts on neighbouring properties within close proximity of the Order Limits. The Proposed Development would not give rise to any overbearing or overwhelming visual effects on the surrounding properties as outlined within the RVAA.



Topic	Theme	Summary of points raised	RR reference	MPSF's Response
				<p>The Applicant has considered the design of the solar PV array and associated structures and has included design guidance to mitigate the impact of these , as set out in the Design and Access Statement [APP-204] and secured through the DCO.</p> <p>In any event, no significant adverse effects to the visual amenity of residential properties are assessed to arise from the Proposed Development.</p> <p>The Green Infrastructure Strategy Plan [APP-173], Figure 6.11 of the LVIA [APP-036], the Outline Landscape and Ecology Management Plan [APP-210] and the Work Plans [AS-003] illustrate the areas near to settlements proposed as Mitigation and Enhancement Areas and detail how the retained and new planting proposed will be managed.</p>
Landscape and Visual	Visual Impacts	Concern that the Proposed Development will be the start of the industrialisation of the rural landscape.	RR-0860, RR-0756, RR-0879, RR-0482, RR-0039, RR-0129, RR-0113, RR-0915, RR-1084, RR-1203, RR-0793, RR-0023, RR-0572, RR-0514, RR-0280, RR-0600, RR-0410, RR-0758, RR-0727, RR-1162, RR-0642, RR-0050, RR-0283, RR-0037, RR-0675, RR-0731, RR-0971, RR-1066, RR-1010, RR-0019, RR-033, RR-0009, RR-0984, RR-0959, RR-0874, RR-0805, RR-0794, RR-0782, RR-0781, RR-0733, RR-0648, RR-0547, RR-0526, RR-0477, RR-0464, RR-0399, RR-0396, RR-0303, RR-0308, RR-0276,	<p>The potential landscape and visual effects have been comprehensively assessed in accordance with best practice guidance and informed by stakeholder consultation. The results of this assessment are set out in detail within the LVIA within Chapter 6 of the ES [APP-036].</p> <p>There is often a disparity of opinion and public attitudes towards renewable energy development from adverse to positive. Third party representations often refer to the industrial character of a solar farm.</p>

Topic	Theme	Summary of points raised	RR reference	MPSF's Response
			RR-0247, RR-0237, RR-0186, RR-0167, RR-0135, RR-0049, RR-0028.  RR-0408, RR-0333	<p>Whilst some local objectors might view a solar farm in this way, equally, other people would simply view solar farms as essential infrastructure that should be delivered as a matter of urgency to tackle climate change. It is important to note the characteristics of solar development is very different to 'traditional' forms of heavy industry and energy generation. The modular nature of solar development allows it to integrate within the existing landscape with minimal impact in comparison to many other development types.</p> <p>In light of this, a precautionary approach is applied to the LVIA which assumes that all the effects are considered to be 'adverse' unless otherwise stated. Notwithstanding this precautionary approach there are many positive effects that would arise through the proposed landscape mitigation and enhancement measures which have also been taken into account within the LVIA.</p> <p>It is also noted that whilst this solar farm is of a large utility scale, the overall scale of the development would appear subdivided and compartmentalised by the landform, woodland, and hedgerows such that it would not be entirely visible from any given location. The Scheme will also be decommissioned in the future, meaning that impacts will be reversible.</p> <p>Furthermore, the Applicant considers that it is improving the recreational resource in the area through the network of permissive paths proposed to</p>

Topic	Theme	Summary of points raised	RR reference	MPSF's Response
				be created. Impacts to ProWs have been considered throughout design development
Landscape and Visual	Visual screening	Concern over the lack of immediate visual screening, and that the proposed mitigation is minimal.	RR-0309, RR-1103, RR-0600, RR-0664, RR-0285. RR-0408	<p>There would inevitably be some loss of countryside views in close proximity to the Proposed Development. Hedgerows and woodlands have been proposed as mitigation at key locations. It is acknowledged within the LVIA that not all views would be entirely screened by the proposed planting. However, due to landform and the framework of woodlands, treebelts and hedgerows, the Solar PV Site would generally appear subdivided and compartmentalised and screened over-time from the majority of viewpoint locations.</p> <p>The visual assessments within the LVIA has informed the locations of proposed woodlands and hedgerows to provide additional visual screening within the Order Limits where necessary. The proposed woodland and hedgerows are indicated on the Green Infrastructure Strategy Plan [APP-173] and Figure 6.11 of the LVIA [APP-036].</p> <p>Furthermore, more mature species of planting can be specified providing greater immediate screening benefits where needed.</p>
Landscape and Visual	Visual assessment	Lack of assessment of the impacts of the proposed development on surrounding visuals.	RR-0647	<p>The photomontages provided in support of the LVIA within Figure 6.10A – 6.10E [APP-168 to APP-172] have been used to inform the professional judgements within the LVIA and correspond to a number of the representative viewpoints. However, the photomontages are illustrative and the assessments within the LVIA are not restricted to these viewpoint locations.</p>

Topic	Theme	Summary of points raised	RR reference	MPSF's Response
Landscape and Visual	Removal of solar panels from specific field parcel	Please consider, at least, removing the close proximity of this solar panel panorama away from the views we presently have from our home. And if the whole project is rejected, so much the better.	RR-045	<p>A Residential Visual Amenity Assessment (RVAA) has been undertaken to consider the potential impacts to dwellings in close proximity to the Order Limits [APP-057].</p> <p>The findings of the RVAA has informed the site layout and mitigation measures to ensure the Proposed Development would not appear 'overbearing' or 'overwhelming' and would not result in any unacceptable effects on residential visual amenity to any property, including to RR-45 at North Lodge Farm (where fields with panels were removed, and boundary planting proposed).</p> <p>The Design and Access Statement [APP-204] sets out how the design of the Proposed Development has responded to its context, including the Project Principles which have informed the design.</p> <p>The Green Infrastructure Strategy Plan [APP-173], Figure 6.11 of the LVIA [APP-036], the Outline Landscape and Ecology Management Plan [APP-210] and the Work Plans [AS-003] illustrate the areas near to settlements proposed as Mitigation and Enhancement Areas and detail how the retained and new planting proposed will be managed.</p>

Support of Proposed Development

Topic	Theme	Summary of points raised	RR reference	MPSF's Response
General	Support	Supportive of the Proposed Development.	RR-0118, RR-0827, RR-1211, RR-0018, RR-0148, RR-0940, RR-0091, RR-0263, RR-0729, RR-0580, RR-0916, RR-0007, RR-0919, RR-0431, RR-0993, RR-0763, RR-0912, RR-0476, RR-0888, RR-0836, RR-0614, RR-0076, RR-0575, RR-0288, RR-0962, RR-0838, RR-0002, RR-1176, RR-0858, RR-0446, RR-0248, RR-0116, RR-0947, RR-0555.  RR-0985, RR-0542	This is support is noted and welcomed by the Applicant.

## Traffic and Transport

Topic	Theme	Summary of points raised	RR reference	MPSF's Response
Traffic and Transport	Traffic levels	Concerns that the proposed development will result in detrimental traffic congestion on all local roads.	RR-0284, RR-0860, RR-1154, RR-1090, RR-0017, RR-0055, RR-0230, RR-0723, RR-0848, RR-1001, RR-1088, RR-0061, RR-0109, RR-0094, RR-0584, RR-0784, RR-0518, RR-1103, RR-0121, R,R-0654, RR-0786, RR-0998, RR-1156, RR-0710, RR-07146, RR-0685, RR-0727, RR-1210, RR-0229, RR-1195, RR-0682, RR-0103, RR-0144, RR-0950, RR-1168, RR-0191, RR-1097, RR-0037, RR-0664, RR-0883, RR-1118, RR-0462, RR-1010, RR-1191, RR-1111, RR-1079, RR-1038, RR-0939, RR-0828, RR-0755, RR-0651, RR-0607, RR-0588, RR-0570, RR-0546, RR-0369, RR-0240, RR-0235, RR-0155, RR-0151, RR-0041, RR-0034, RR-0021, RR-1194, RR-1139, RR-1133, RR-1119, RR-1110, RR-1093, RR-1002, RR-0579, RR-0565, RR-0483, RR-0450, RR-0422, RR-0400, RR-0355, RR-0354, RR-0300, RR-0215, RR-0190, RR-0145, RR-0098, RR-0035, RR-0027, RR-1206, RR-1190, RR-1170, RR-1095, RR-1003, RR-0938, RR-0931, RR-0913, RR-0853, RR-0817, RR-0779, RR-0596, RR-0558, RR-0534, RR-0516, RR-0499, RR-0418, RR-0392, RR-0391, RR-0374, RR-0357, RR-0341, RR-0310, RR-0269, RR-0258, RR-0252, RR-0127, RR-0095, RR-1218, RR-1212, RR-1178, RR-1117, RR-1104, RR-1029, RR-1025, RR-0878, RR-0861, RR-0843, RR-0643, RR-0495, RR-0492, RR-0474, RR-0443, RR-0362, RR-0359, RR-0123, RR-0029, RR-1199, RR-1184, RR-1177, RR-1105, RR-1062, RR-1012, RR-0941, RR-0906, RR-0603, RR-0484, RR-0393, RR-0315, RR-0311, RR-0206, RR-0196, RR-0195, RR-0184, RR-0166, RR-1043, RR-0997, RR-0893, RR-0864, RR-0549,	<p>The delivery hours of HGVs to the primary compound will be restricted to avoid morning and evening peak hours, as well as avoiding school drop-off and pick up hours – meaning on weekdays HGV deliveries to the primary compound will only take place between 09:00-15:00. This will be secured by way of requirement in the DCO requiring the development and approval of a final CTMP (which will be in accordance with the oCTMP). Breaching the requirements of the DCO is a criminal offence. Further details on these measures are provided in Section 4 of the oCTMP [APP-212].</p> <p>As set out in ES Chapter 9 Highways and Access [APP-039], the Proposed Development will result in a negligible increase in traffic on the majority of the local network, with less than a 2% or lesser increase in the daily vehicle flows. Where there is a greater impact on Uffington Lane from increased numbers of HGVs, mitigation is proposed in the form of passing places and widening at the junction with the A6121 to help facilitate two-way HGV flows. This mitigation is secured through the outline Construction Traffic Management Plan (oCTMP) [APP-212].</p> <p>Highway condition surveys will be undertaken both before and after construction to determine the state of the existing highway, the scope of which will be agreed with RCC and LCC. The Applicant will repair any</p>

			<p>RR-0389, RR-0274, RR-0231, RR-0081, RR-1171, RR-0805, RR-0794, RR-0781, RR-0733, RR-0598, RR-0504, RR-0399, RR-0276, RR0186, RR-0167, RR-0135, RR-1092, RR-0798, RR-0632, RR-0409, RR-0502, RR-0306, RR-0305, RR-0298, RR-0265, RR-0260, RR-0072, RR-0068, RR-0289, RR-0194, RR-1180, RR-1155, RR-0741, RR-0030, RR-0550, RR-1058, RR-0921, RR-0856, RR-0725, RR-0383, RR-0872, RR-0493, RR-0686, RR-0622, RR-0412.</p> <p>RR-0043, RR-0767, RR-0194, RR-0291, RR-0759, RR-0333, RR-0397, RR-0454, RR-0472, RR-0567, RR-0622, <u>RR-0771, RR-0752, RR-0808, RR-1155, RR-0926, RR-1080, RR-1149, RR-1152</u></p>	<p>damage caused to highways as a result of construction traffic to a standard set out in the pre-construction surveys. Enabling works will also be provided at the access points across the Order limits to upgrade the existing access points to an appropriate standard. Further details on the measures to mitigate construction traffic are provided within Section 4 of the oCTMP [APP-212].</p>
Traffic and Transport	Traffic levels	Concern that the increased traffic levels will danger both local wildlife and local residents who utilise the road network.	<p>RR-0214, RR-0860, RR-0756, RR-0309, RR-1147, RR-1077, RR-0160, RR-0600, RR-0143, RR-0629, RR-1049, RR-0588,</p> <p>RR-0767, RR-0472, RR-0808, RR-1080, RR-0666,</p>	<p>The construction traffic impact assessment is set out in ES Chapter 9 Highways and Access [APP-039].</p> <p>The assessment identified that the Proposed Development will result in a negligible increase in traffic on the majority of the local network, with a 2% or lesser increase in the daily vehicle flows. Where there is a greater impact on Uffington Lane from increased numbers of HGVs, mitigation is proposed in the form of passing places and widening at the junction with the A6121 to help facilitate two-way HGV flows.</p> <p>In addition, further mitigation of the transport impacts is provided through the following measures:</p> <ul style="list-style-type: none"> <li>• Access locations: the access points chosen are sufficient to accommodate HGVs and the</li> </ul>

				<p>provision of appropriate visibility splays. The use of existing access points has been prioritised to minimise the environmental impacts associated with the creation of new points of vehicular access, such as the removal of hedgerows. Where there is not a reasonable access location within the vicinity of the relevant area of the Solar PV Site, a new vehicle access has been provided that complies with all relevant highway safety requirements.</p> <ul style="list-style-type: none"><li>• Consolidation: deliveries will go directly to the primary compound, providing additional means of control and management. From the primary compound, materials will be distributed to the secondary compounds via smaller, local vehicles which reduces the likelihood of two-way HGV conflicts and impacts to wildlife and local residents.</li><li>• Internal routing: internal access routes will be provided within the Order limits to minimise vehicles needing to use the local road network.</li><li>• Vehicle routing: construction vehicles will only utilise the permitted access routes, secured by a requirement in the DCO. It is a criminal offence to breach this requirement. This ensures that only the routes deemed appropriate are utilised and limits any impacts of construction vehicles to the agreed routes.</li><li>• Shuttle service: a staff shuttle service will be deployed from the primary construction compound to transport staff to the relevant</li></ul>
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				<p>area where works are required, which will be subject to phasing.</p> <ul style="list-style-type: none"><li>• Restricted delivery hours: the delivery hours of HGVs to the primary compound will be restricted to avoid morning and evening peak hours, as well as avoiding School drop-off and pick up hours – meaning on weekdays HGV deliveries to the primary compound will only take place between 09:00-15:00 – minimising the impacts to users of the local road network. This will be secured by way of requirement in the DCO.</li><li>• Management plans: a number of supporting management plans are proposed including an oCEMP [APP-207], oCTMP [APP-212] and oTP [APP-215] which will be secured by way of requirement on the DCO and assist further in mitigating the impacts of construction.</li><li>• It is highly unlikely that the proposed increase of 2% or less in traffic would result in any impacts to local wildlife and no such effects have been identified in the ES. This small increase in vehicle movements would be largely during the day when traffic collision with wildlife is unlikely.</li></ul> <p>The assessments within ES Chapter 9 conclude that the highway and access effects of the Proposed Development will be negligible.</p>
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Traffic and Transport	Traffic levels	Concern that the increase in traffic will cause further damage to the inadequate road network that exists around the proposed development.	<p>RR-0638, RR-0860, RR-0900, RR-1090, RR-0055, RR-0848, RR-0892, RR-1215, RR-1042, RR-1122, RR-0852, RR-0280, RR-0998, RR-1028, RR-1159, RR-0631, RR-0316, RR-0690, RR-0486, RR-0296, RR-0275, RR-0264, RR-1181, RR-1163, RR-1053, RR-0968, RR-0960, RR-0289</p> <p>RR-0767 RR-0291, RR-0333, RR-0397, RR-0454, RR-0472, RR-0771, RR-0926, RR-1152</p>	<p>The Traffic Regulation Measures (Temporary Measures) Plans set out the locations where it is considered likely that speed limit restrictions would be necessary and the DCO provides that sufficient notice will be given to the police, traffic authority and the public as to when such restrictions are required.</p> <p>Construction vehicles will only use the permitted routes to access the Order Limits. The routes to the primary construction compound are Routes 1 and 3 as shown on Figure 3-1 in the oCTMP [APP-212]. These routes have been selected as they form the most direct, suitable means of access to the Order Limits from the SRN, that are considered to be appropriate to accommodate HGV traffic given there is already an existing level of HGV traffic identified on these roads. The HGV routes have also been chosen to minimise the opportunities for conflicting HGV movements along Route 1 and avoid weight limit restrictions. Use of these roads exclusively will limit the impact on the wider road network, ensuring that only the roads identified as being suitable are used and in turn reducing any potential adverse effects. These measures will be secured by way of requirement in the DCO through the final CTMP. Breaching the requirements of the DCO is a criminal offence.</p> <p>Passing places will be introduced along Uffington Lane to help facilitate two-way flows during the construction phase, as well as minor widening works to the A6121 / Uffington Lane priority junction to enable two-way HGV flows. More details are provided within Appendix 9.4 of ES Chapter 9 [APP-074].</p>
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				<p>Highway condition surveys will be undertaken both before and after construction to determine the state of the existing highway, the scope of which will be agreed with RCC and LCC. The Applicant will repair any damage caused to highways as a result of construction traffic to a standard set out in the pre-construction surveys. Enabling works will also be provided at the access points across the Order limits to upgrade the existing access points to an appropriate standard. Further details are provided within Section 4 of the oCTMP <b>[APP-212]</b></p>
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## Construction Impacts

Topic	Theme	Summary of points raised	RR reference	MPSF's Response
Construction	Construction Traffic	Concern about the proposed levels of construction traffic, in particular HGVs, using the local roads and impacting local movements.	RR-0245, RR-0756, RR-0723, RR-1001, RR-1088, RR-1122, RR-0784, RR-03, RR-0121, RR-0998, RR-1115, RR-0685, RR-0727, RR-1195, RR-0682, RR-1159, RR-0679, RR-050, RR-0388, RR-0079, RR-0631, RR-0629, RR-1118, RR-0285, RR-0316, RR-0462, RR-1209, RR-1221, RR-1149, RR-1049, RR-0939, RR-0929, RR-0799, RR-0690, RR-0677, RR-0666, RR-0585, RR-0553, RR-0546, RR-0375, RR-0296, RR-0294, RR-0059, RR-0043, RR-0020, RR-0006, RR-1181, RR-1163, RR-1146, RR-1139, RR-1093, RR-1040, RR-1033, RR-0956, RR-0871, RR-0683, RR-0646, RR-0312, RR-0193, RR-1114, RR-1029, RR-0842, RR-0703, RR-0606, RR-0573, RR-0562, RR-0123, RR-1129, RR-0742, RR-0358, RR-0272, RR-0154, RR-0739, RR-0591, RR-0498, RR-0445, RR-0003, RR-0889, RR-0437, RR-0433, RR-0378, RR-0307, RR-0004, RR-0130, RR-0012, RR-0897, RR-0624, RR-1116, RR-0649, RR-0093, RR-0665, RR-0601, RR-1107.  RR-0030, RR-0117, RR-0454, RR-0397, RR-0645, RR-0771, RR-0834,	As informed by the baseline traffic surveys undertaken (see <b>Appendix 9.5</b> of ES Chapter 9 [ <b>APP-075</b> ]) the construction vehicle access routes are already used by HGVs. As set out in <b>Appendix 9.6</b> of ES Chapter 9 [ <b>APP-076</b> ], the proposed construction works will generate less than an 11% increase in daily HGV flows across the majority of links assessed and a 2% or lesser increase in total daily vehicle flows. Where there is a greater impact on Uffington Lane from increased numbers of HGVs, mitigation is proposed in the form of passing places and widening at the junction with the A6121 to help facilitate two-way HGV flows. This mitigation is secured through the outline Construction Traffic Management Plan (Octmp) [ <b>APP-212</b> ].  The use of a consolidation strategy which routes vehicles to a primary construction compound for deliveries will allow direct access to the Solar PV Site and reduce the need for larger deliveries to impact the Local Road Network. This will provide additional control on the timing and type of vehicle deliveries to the secondary compounds. Further details of the mitigation measures for managing construction traffic can be found within the oCTMP [ <b>APP-212</b> ].
Construction	Impact on access to the property	Concern about the ability to access individual properties during the two-year	RR-0117, RR-0291, RR-0759, RR-0801, RR-0645, RR-0782, <u>RR-0771</u> , RR-0808, RR-0926, RR-1004	There may be a need for temporary traffic measures along the A6121 in Essendine to accommodate cabling works, which could include traffic signals and speed limit reductions to 30mph. Whilst the details are yet to

Topic	Theme	Summary of points raised	RR reference	MPSF's Response
		construction period.		<p>be confirmed, it is expected this will be over a short duration (e.g. assumed to be over a number of days/weeks, rather than months) and will be mitigated further through the supporting management plans, including the final Construction Environmental Management Plan (CEMP) [APP-207] and Construction Traffic Management Plan [APP-212].</p> <p>The details of the temporary traffic measures will be agreed upon with the Local Highway Authorities and any stakeholders prior to the commencement of any works to ensure that appropriate access is maintained for all properties. There will be communications provided through the CEMP/CTMP to inform all parties of the nature of the works and any implications.</p> <p>This information will be detailed within the final CTMP, secured by way of requirement on the DCO.</p>
Construction	Compensation	Further information is required about potential compensation for locals as a result of the 2-year construction period.	RR-0892	<p>The Applicant does not propose compensation for residents, above and beyond those able to be claimed through heads of claim able to be sought under legislation.</p> <p>In any event, construction impacts will be mitigated pursuant to the measures set out in the Ocamp, which are secured via the DCO [APP-207].</p> <p>Whilst not a direct local benefit, there is benefit to all UK citizens from the UK producing more clean, renewable electricity, in terms of affordability and</p>

Topic	Theme	Summary of points raised	RR reference	MPSF's Response
				<p>energy security and resilience. This is considered further in the Statement of Need [APP-202].</p> <p>Section 8 of the Planning Statement [APP-203] concludes with a consideration of the Planning Balance and justifies how the overwhelming national need, as demonstrated in the Statement of Need outweighs any potential significant adverse impacts which, as the Environmental Statement sets out, are limited.</p>
Construction	Impacting local environment and habitats	Concern that the construction works of the Proposed Development will damage the local environment and habitats.	RR-0652, RR-1023, RR-0173, RR-0230, RR-0502, RR-0682, RR-0388, RR-0079, RR-0771, RR-1169, RR-0137, RR-0570, RR-0509, RR-0436, RR-0282, RR-1110, RR-0288, RR-0519, RR-0170, RR-0881, RR-0067, RR-0009, RR-0049, RR-0447,	<p>Chapter 7: Ecology and Biodiversity, of the ES [APP-037], presents the approach and findings of the assessment of potential impacts on Ecology and Biodiversity. The ecological and biodiversity assessment follows the general approach to undertaking EIA as explained in Chapter 2 of the ES [APP-032], albeit it has been modified to take account of the main guidance document used when assessing impacts on ecological features, which is the Ecological Impact Assessment (EclA) guidance published by the Chartered Institute for Ecology and Environmental Management (CIEEM) in 2018.</p> <p>The embedded mitigation measures include the details set out in the outline Construction and Environmental Management Plan (Ocomp) [APP-207], outline Decommissioning and Environmental Management Plan (Odemp) [APP-209] and outline Landscape and Ecological Management Plan (Olemp) [APP-210]. The Green Infrastructure (GI) strategy for the Proposed Development has been prepared to create new</p>

Topic	Theme	Summary of points raised	RR reference	MPSF's Response
				<p>Habitats of biodiversity value, and/or biodiversity net gain and is secured through the OLEMP.</p> <p>These documents have been prepared and include mitigation measures which are intended to avoid the risks of effects during the construction and decommissioning phases, such as indirect and direct damage to retained features, direct damage to active bird nests and injury to protected species or damage to the habitat of those species. The assessment of potential effects takes these measures into account and concludes that no significant effects are anticipated.</p>
Construction	Impact on local infrastructure and local residents	Concern that the construction works will negatively impact the local infrastructure. In addition, will cause negative effects upon local resident's well-being.	RR-0672, RR-0846, RR-0969, RR-1088, RR-0061, RR-0094, RR-0834, RR-0507, RR-0047, RR-0215, RR-1159, RR-0388, RR-0971, RR-1066, RR-0462, RR-0797, RR-1038, RR-0151, RR-0102, RR-1170, RR-1094, RR-0378, RR-0045, RR-0834,	The Environmental Statement has assessed the potential effects of the construction phases of the Proposed Development in relation to impacts to wellbeing through the assessment of noise, air quality, amenity and recreation and traffic assessments, all of which conclude that no likely significant effects are expected to arise, with mitigation measures secured through the oCEMP [APP-207] and oCTMP [APP-212] taken into account.
Construction	Noise	Concerns about the increase in noise levels from the proposed construction works.	RR-1090, RR-0723, RR-1001, RR-1057, RR-1088, RR-1046, RR-0507, RR-1115, RR-0727, RR-1159, RR-0682, RR-1168, RR-0388, RR-0079, RR-1118, RR-0285, RR-0462, RR-0151, RR-0020, RR-0968, RR-0871, RR-0312, RR-1190, RR-0907, RR-0612, RR-1038, RR-0666, RR-0509, RR-0375, RR-0235,	A detailed and robust noise and vibration assessment has been undertaken in Chapter 10: Noise and Vibration of the Environmental Statement [APP-040] This includes a robust assessment of the potential noise and vibration effects during the construction

Topic	Theme	Summary of points raised	RR reference	MPSF's Response
			RR-0020, RR-1146, RR-0907, RR-0612, RR-0624, RR-0545,  RR-0333, RR-0397, RR-0454, RR-0645, RR-0782,	<p>phase, on a worst-case basis considering the predicted noise levels at the closest point to noise-sensitive receptors for each potential noise-generating activity that could occur within each of the relevant Works Area.</p> <p>The assessment's findings at paragraph 10.13 were that with the implementation of the relevant mitigation measures, no significant adverse noise and vibration effects are expected during the construction phase of the Proposed Development.</p>



### Socio-Economic Impacts and Impact on Quality of Life

Topic	Theme	Summary of points raised	RR reference	MPSF's Response
Socio-Economic Impacts	Local economy	Concern that the Proposed Development will drastically impact the local economy, in particular the surrounding property prices.	RR-0284, RR-0129, RR-0969, RR-1046, RR-0834, RR-0908, RR-0816, RR-0618, RR-1115, RR-1156, RR-0215, RR-0679, RR-1161, RR-0797, RR-1149, RR-1132, RR-1049, RR-1024, RR-0952, RR-0407, RR-0338, RR-0294, RR-0282, RR-0234, , RR-0335, RR-1127, RR-0596, RR-0392, RR-0019, RR-0117, RR-0622, RR-0266, RR-0333, RR-0137, RR-0569, RR-0834, RR-0808, <u>RR-0926</u> , <u>RR-0952</u> , <u>RR-1091</u>	<p>The assessment of potential economic benefits on the study area of Rutland and South Kesteven during the construction, operation and decommissioning phases is undertaken as part of the socio-economics assessment provided in chapter 14 of the Environmental Statement [APP-044]. An Outline Employment Skills and Supply Chain Plan [APP-211] has been developed that sets out how the developer will work with local partners to encourage and enable the take up of employment and supply chain opportunities by Rutland and South Kesteven residents.</p> <p>The Applicant has designed the Proposed Scheme to minimise impacts in the local area.</p> <p>There is no empirical research or evidence, so far as we are aware, that suggests solar farms affect property values. As such, we do not expect this to happen. However, our approach to designing the scheme has been informed by a Landscape and Visual Impact Assessment (LVIA) and Residential Visual Amenity Assessment to help identify appropriate setbacks between the development and receptors and a planting mitigation strategy to reduce visual impact.</p> <p>The Applicant notes that parties identified in the Book of Reference may be eligible for compensation under the usual statutory grounds, but such grounds do not include any general thought that property prices have fallen simply due to the presence of development in the surrounding area. In light of this and the fact that</p>

Topic	Theme	Summary of points raised	RR reference	MPSF's Response
				<p>compensation is a matter that be disregarded by the Secretary of State in considering an application, pursuant to section 106 of the Planning Act 2008, the Applicant considers that this is not a material consideration.</p>
Socio-Economic Impacts	Tourism levels	<p>Concern that the Proposed Development will impact tourism levels, which will subsequently impact the local economy.</p>	<p>RR-1035, RR-0942, RR-0952, RR-0765, RR-0621, RR-0021, RR-0020, RR-0968, RR-0963, RR-0695, RR-0325, RR-1173, RR-1003, RR-0611, RR-0127, RR-0069,  RR-0043, RR-0333, RR-0771, RR-1126</p>	<p>Our approach to designing the scheme has been informed by a Landscape and Visual Impact Assessment (LVIA) and Residential Visual Amenity Assessment to help identify which fields should be developed, where appropriate development setbacks from properties should be observed, and the planting mitigation strategy.</p> <p>The assessment of potential impacts on tourism during the construction, operation and decommissioning phases is undertaken as part of the socio-economics assessment provided in chapter 14 of the Environmental Statement [APP-044]. It concludes that, given the only adverse effects would be experienced by users of PRoW within and closest to the Order limits and that accommodation providers could potentially benefit from additional income from staying workers, it is considered that, on balance, the construction phase will have a negligible to minor adverse effect on tourism.</p> <p>It is also considered that the presence of the Proposed Development would only have a negligible to minor adverse effect on tourism during the operational phase, which is not significant. This conclusion is based on the findings of the Landscape and Visual and Noise</p>

Topic	Theme	Summary of points raised	RR reference	MPSF's Response
				and Vibration chapters that assess any adverse impacts to be limited to the Order limits and immediate surroundings and slight/minimal (not significant).
Socio-Economic Impacts	Local wellbeing/quality of life	Concern that the Proposed Development will negatively impact the wellbeing and quality of life of all local residents.	RR-0850, RR-0848, RR-1077, RR-0584, RR-0711, RR-0249, RR-1156, RR-1028, RR-0824, RR-0143, RR-0079, RR-0675, RR-0971, RR-0165, RR-0942, RR-1193, RR-0797, RR-1010, RR-0327, RR-0333, RR-1201, RR-1132, RR-1124, RR-1038, RR-0854, RR-0809, RR-0690, RR-0621, RR-0454, RR-0275, RR-0240, RR-0151, RR-0044, RR-0043, RR-1181, RR-0201, RR-0035, RR-0016, RR-1117, RR-0771, RR-0808	The Environmental Statement has assessed the potential effects of the construction phases of the Proposed Development in relation to impacts to wellbeing through the assessment of noise, air quality, amenity and recreation and traffic assessments, all of which conclude that no likely significant effects are expected to arise, with mitigation measures secured through the oCEMP [APP-207] and oCTMP [APP-212] taken into account.
Socio-economic Impacts	Impact on wellbeing	Concerns regarding the impact on local resident's physical health and mental health	RR-0194, RR-0759, RR-0333, RR-0567, RR-1165, RR-1038, RR-0867, RR-0546, RR-0436, RR-0397, RR-0102, RR-0059, RR-0020, RR-1181, RR-0215, RR-0771,	<p>The Planning Inspectorate was consulted regarding the scope of the Environmental Impact Assessment through an EIA Scoping Opinion Request [APP-049]. The Planning Inspectorate provided an EIA Scoping Opinion [APP-050] and the Environmental Statement is based upon this Scoping Opinion. The Scoping Opinion Matrix [APP-051] sets out how the ES accords with the EIA Scoping Opinion. The Planning Inspectorate agreed that human health impacts should be addressed through the relevant technical assessments:</p> <ul style="list-style-type: none"> <li>• Highways and Access [APP-039]</li> <li>• Noise and Vibration [APP-040]</li> <li>• Other Environmental Topics including Air Quality, Glint and Glare, Major Accidents and/or Disasters and Utilities) [APP-045]</li> </ul>

Topic	Theme	Summary of points raised	RR reference	MPSF's Response
				These assessments conclude that no likely significant adverse effects are expected to arise from these topics.

### Cultural Heritage and Archaeological Impacts

Topic	Theme	Summary of points raised	RR reference	MPSF's Response
Cultural Heritage	Archaeological Remains	Concern that the Proposed Development will negatively impact on the surrounding archaeological remains in the area.	RR-1154, RR-0518, RR-0668, RR-1159, RR-1181, RR-1110, RR-0228, RR-0027, RR-0258, RR-1114.  RR-0771	<p>The effect of the Proposed Development on buried archaeological remains has been assessed and reported in Chapter 8: Cultural Heritage [APP-038] and its associated appendices. No significant or material effects are anticipated, as the nature of the Proposed Development is such that its construction, operation and decommissioning will result in minimal ground disturbance.</p> <p>The Applicant is also proposing a suite of mitigation proposals will adequately manage any adverse impacts at the detailed design phase. These measures, which are detailed in the oCEMP [APP-207], will enable buried archaeological remains (that are specifically sensitive) to be protected from any form of disturbance.</p>
Cultural Heritage	Heritage Assets	Concern that the Proposed Development will affect the surrounding heritage assets.	RR-0653, RR-1090, RR-0892, RR-0502, RR-0784, RR-0581, RR-0951, RR-0229, RR-0942, RR-0566, RR-0726, RR-1003, RR-0341, RR-0258, RR-0159,  RR-0408, RR-0771	<p>The effect of the Proposed Development changing the setting(s) of designated (and non-designated) heritage assets has been assessed and reported in Chapter 8: Cultural Heritage [APP-038] and its associated appendices.</p> <p>No significant or material effects are anticipated. While the Proposed Development will alter the current rural setting, it will not alter any elements that contribute to the significance of these assets, and no harm to their significance will occur as a result of the Proposed Development. For more detail</p>

Topic	Theme	Summary of points raised	RR reference	MPSF's Response
				see ES Appendix 8.4: Cultural Heritage Impact Assessment [APP-068].

## Project Size and Scale

Topic	Theme	Summary of points raised	RR reference	MPSF's Response
Project Description	Scale	Concerns over the vast unprecedented scale of the Proposed Development, will result in large impacts on the surrounding area.	RR-0553, RR-0989, RR-0005, RR-0187, RR-0336, RR-0370, RR-0543, RR-0672, RR-0691, RR-0860, RR-1154, RR-0756, RR-0846, RR-1083, RR-1136, RR-1145, RR-00309, RR-0482, RR-0471, RR-1090, RR-0017, RR-0039, RR-0055, RR-0230, RR-0848, RR-0892, RR-1072, RR-1088, RR-1215, RR-0152, RR-0647, RR-0983, RR-1030, RR-1042, RR-1122, RR-1142, RR-0074, RR-0502, RR-0094, RR-0362, RR-0584, RR-0701, RR-0711, RR-0834, RR-1203, RR-0121, RR-0405, RR-0789, RR-0440, RR-0366, RR-1128, RR-1166, RR-0092, RR-0581, RR-0654, RR-0816, RR-0280, RR-0600, RR-0618, RR-0047, RR-0905, RR-1011, RR-1156, RR-0668, RR-0710, RR-0758, RR-0951, RR-0182, RR-0685, RR-0727, RR-0761, RR-0863, RR-1210, RR-0229, RR-0428, RR-0682, RR-0824, RR-1192, RR-0143, RR-0144, RR-0679, RR-0894, RR-1161, RR-0050, RR-0101, RR-0803, RR-0037, RR-0079, RR-0996, RR-1208, RR-0233, RR-0629, RR-0165, RR-1118, RR-1193, RR-0285, RR-0462, RR-0536, RR-0797, RR-1010, RR-1048, RR-1070, RR-0372, RR-1197, RR-1221, RR-1191, RR-1183, RR-1169, RR-1149, RR-1143, RR-1059, RR-1049, RR-1038, RR-0999, RR-0974, RR-0967, RR-0952, RR-0939, RR-0937, RR-0929, RR-0918, RR-0899, RR-0886, RR-0876, RR-0799, RR-0765, RR-0760, RR-0754, RR-0721, RR-0690, RR-0677, RR-0671, RR-0651, RR-0621, RR-0593, RR-0570, RR-0546, RR-0541, RR-0520, RR-0465, RR-0454, RR-0448, RR-0398, RR-0397, RR-0351, RR-0332, RR-0301, RR-0294, RR-0282, RR-0279, RR-0275, RR-0257, RR-0254, RR-0253,	There is an urgent need for renewable energy projects to deliver the Government's legally binding commitment to net zero, which cannot be reached with the delivery of small sites alone – projects are needed to deliver energy at scale, as discussed in the section 8.5 <b>Statement of Need [APP-202]</b> , which concludes that the development of large sites (which connect to the transmission network) is essential in order to connect the scale of new capacity required to meet Net Zero requirements. On this basis, the emphasis should be on maximising the use of available capacity at grid connections where they occur. Consideration was therefore given to areas in the UK where grid connections were available and that were suitable for solar development.  Low-carbon electricity generation facilities are essential to deliver a zero-carbon electricity system, which can then be used also to deliver decarbonisation of other sectors including transport, industrial processes and home heating. <b>Paragraph 8.9.3 of the Statement of Need</b> describes Government's aim to achieve a decarbonised UK power system by 2035. To achieve this, significant capacities of low-carbon generation must be built out this decade, and <b>Figure 7.2 of the Statement of Need</b> shows National Grid's latest projections of the solar

			<p>RR-0241, RR-0240, RR-0235, RR-0219, RR-0199, RR-0155, RR-0151, RR-0102, RR-0057, RR-0043, RR-0041, RR-0034, RR-0032, RR-0020, RR-0006, RR-1194, RR-1186, RR-1181, RR-1157, RR-1146, RR-1139, RR-1123, RR-1110, RR-1102, RR-1089, RR-1063, RR-1053, RR-1040, RR-1033, RR-0968, RR-0956, RR-0944, RR-0925, RR-0896, RR-0895, RR-0868, RR-0840, RR-0807, RR-0734, RR-0712, RR-0565, RR-0497, RR-0491, RR-0483, RR-0450, RR-0400, RR-0363, RR-0355, RR-0354, RR-0335, RR-0327, RR-0312, RR-0215, RR-0175, RR-0169, RR-0145, RR-0114, RR-0038, RR-0027, RR-1207, RR-1206, RR-1127, RR-1109, RR-1095, RR-1003, RR-0938, RR-0931, RR-0907, RR-0891, RR-0853, RR-0832, RR-0787, RR-0779, RR-0759, RR-0751, RR-0728, RR-0717, RR-0612, RR-0596, RR-0589, RR-0534, RR-0516, RR-0499, RR-0468, RR-0418, RR-0392, RR-0391, RR-0258, RR-0252, RR-1220, RR-1218, RR-1137, RR-1114, RR-1087, RR-1069</p> <p>RR-0019, RR-0030, RR-0043, RR-0767, RR-0182, RR-1083, RR-0397, RR-0454, RR-0472, RR-0524, RR-0771, RR-0752, RR-0834, RR-1126, RR-1149, RR-1216, RR-0333, RR-0472, RR-0569, RR-0925</p>	<p>generation capacity needed in the UK to keep the UK on the trajectory to meet Net Zero by 2050.</p> <p><b>Section 3.3</b> of the <b>Statement of Need</b> describes Government’s view that large capacities of low-carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that “a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar”.</p> <p>The Site Selection Assessment <b>[APP-203]</b> explains how, taking this need into account the site for the Proposed Development was chosen, with the Design and Access Statement <b>[APP-204]</b> going on to explain how the local context was taken into account in developing the design of the Proposed Development.</p> <p><b>Section 8</b> of the <b>Planning Statement [APP-203]</b> concludes with a consideration of the Planning Balance and justifies how the overwhelming national need, as demonstrated in the <b>Statement of Need</b> outweighs any potential significant adverse impacts which, as the Environmental Statement sets out, are limited including during the construction phase.</p>
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## Land Contamination

Topic	Theme	Summary of points raised	RR reference	MPSF's Response
Water resources and Land Contamination	Land Contamination	Concern that the proposed apparatus for the Proposed Development will alter the soil composition, impacting future developments.	RR-1090, RR-0523, RR-0480, RR-0682, RR-0867, RR-0457, RR-0137, RR-1091, RR-0272, RR-0549,	<p>The Applicant has undertaken an assessment of the potential effects of the Proposed Development in the Environmental Statement including effects on Water Resources and Ground Conditions in Chapter 11 [APP-041]. Paragraphs 11.4.55 to 11.4.60 of this chapter assesses the potential effect of soil compaction as a result of the construction and decommissioning phases of the Proposed Development to be negligible.</p> <p>In accordance with consultation responses received by the Applicant, the assessment also considered the potential effects of chemical pollution because of damaged PV modules or leakages from PV modules in the event of vandalism. This is set out in paragraphs 11.4.10 to 11.4.11 which conclude that in the event of damage there is limited potential for chemicals to transfer to the wider environment. The assessment also considered the potential effect of migration of pollutants from contaminated land in paragraphs 11.4.64 to 11.4.66 and found it to be negligible.</p>
Water resources and Land Contamination	Land Contamination	Concerns that the Proposed Development will result in high levels of toxic waste contaminating the local area.	RR-0509, RR-0646, RR-1091, RR-0667, RR-1140, RR-0782, RR-0598, RR-0981	<p>The Applicant has undertaken an assessment of the potential effects of the Proposed Development in the Environmental Statement including effects on Water Resources and Ground Conditions in Chapter 11 [APP-041].</p> <p>Paragraphs 11.4.64 to 11.4.66 of the Chapter 11 has considered and assessed the impacts associated with</p>

				<p>the migration of pollutants from contaminated land to be negligible.</p> <p>In accordance with consultation responses received by the Applicant, the assessment also considered the potential effects of chemical pollution because of damaged PV modules or leakages from PV modules in the event of vandalism. This is set out in paragraphs 11.4.10 to 11.4.11 which conclude that in the event of damage there is limited potential for chemicals to transfer to the wider environment.</p>
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## Lack of Community Benefit

Topic	Theme	Summary of points raised	RR reference	MPSF's Response
Community Benefits	Lack of community benefits	Further consideration on the benefits for the local community as a result of the Proposed Development.	<p>RR-0381, RR-0846, RR-1134, RR-0647, RR-0841, RR-1030, RR-0502, RR-0711, RR-0784, RR-0834, RR-0518, RR-1065, RR-0092, RR-0654, RR-0507, RR-0600, RR-0998, RR-0215, RR-1195, RR-0682, RR-0824, RR-1192, RR-0737, RR-0679, RR-0388, RR-1038, RR-0886, RR-0760, RR-0755, RR-0546, RR-0235, RR-0155, RR-0102, RR-0043, RR-0020, RR-1040, RR-0829, RR-0628, RR-0450, RR-0355, RR-0325, RR-0035, RR-0016, RR-1109, RR-0907, RR-0759, RR-0612, RR-0226, RR-0211, RR-1025, RR-0299, RR-0170, RR-1177, RR-0602, RR-0395, RR-0315, RR-0206, RR-0739, RR-0426, RR-0239, RR-0180, RR-0106, RR-0004, RR-0719, RR-0741, RR-0897, RR-1005, RR-0921, RR-0633, RR-0665, RR-</p> <p>RR-0030, RR-0043, RR-0266, RR-0759, RR-0408, RR-0472, RR-0771, RR-0834, RR-1149</p>	<p>The Applicant sought to include benefits to the local community from the inception of the Project and has taken a design-led approach to the overall masterplan, including substantial Green Infrastructure commitments from an early date, including opening up of pedestrian walkways along a new river corridor on the West Glen River. This approach is set out in the <b>Design and Access Statement [APP-204]</b>. This approach to ensuring good design in infrastructure developments is also a policy requirement in NPS EN1 (section 4.5).</p> <p>Whilst not a direct local benefit, there is benefit to all UK citizens from the UK producing more clean, renewable electricity, in terms of affordability and energy security and resilience. This is considered further in the <b>Statement of Need [APP-202]</b>.</p> <p><b>Section 10.3 of the Statement of Need [APP-202]</b> describe how solar is already highly competitive against current conventional and renewable generation costs, is predicted to retain a cost advantage for the decades ahead. Further, <b>Section 10.2</b> describes how the deployment of solar generation capacity in the UK reduces the traded price of electricity in the UK and that has benefit for all consumers.</p> <p><b>Section 8.9 of the Statement of Need</b> describes Government's position, set out in the British Energy</p>

				<p>Security Strategy, that: “If we’re going to get prices down and keep them there for the long term, we need a flow of energy that is affordable, clean and above all, secure. We need a power supply that’s made in Britain, for Britain”. Large-scale Solar is such an affordable, secure and clean power source, demonstrating that the Proposed Development is aligned with current and evolving British energy decarbonization and security policy. Such sentiments were repeated by Government in its March 2023 policy publications.</p>
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## Climate Change

Topic	Theme	Summary of points raised	RR reference	MPSF's Response
Climate Change	Net Carbon	Concern that this Proposed Development would do the opposite to that is assumed and will not positively contribute to the Net Zero rate.	RR-1035, RR-1128, RR-0942, RR-0557, RR-0081, RR-1116.  RR-0043, RR-0333	<p>Solar is a low-carbon electricity generation technology. <b>Figure 7.3 of the Statement of Need [APP-202]</b> shows the cumulative carbon emissions saved by solar generation versus the case that the electricity generated by solar was instead generated by the largest non low-carbon power generation technology, Combined Cycle Gas Turbines (which emit carbon at a rate of 394 gCO<sub>2</sub>/kWh) as identified in the <b>Statement of Need</b>. <b>Figure 7.3</b> shows that carbon emissions from electricity generation would be higher if solar developments did not come forwards at the rate that National Grid project is required, than they would be if solar development follows National Grid's projections.</p> <p>The Application was accompanied by a Climate Change assessment at Chapter 13 of the ES [APP-043].</p> <p>This took a very conservative approach to the Green House Gas (GHG) effects of the Proposed Development and concluded (at paragraph 13.4.18) that the CO<sub>2</sub> emissions of the Proposed Development would be displaced within approximately 10.5 years, and all savings beyond that would be a net benefit of the Proposed Development to reducing climate change, relative to the baseline. Over 40 years, for example, the saving is estimated at approximately 1.9 million tonnes of CO<sub>2</sub>.</p>

				This assessment took into account the CO <sub>2</sub> involved in the production of panels and components, construction and decommissioning of the solar farm.
Climate Change	Carbon Footprint	Concern that the Proposed Development will increase the carbon footprint for the UK, due to the high levels of construction vehicles etc.	RR-0309, RR-0481, RR-0824, RR-0523. RR-0043, RR-0333, RR-0771, RR-1149	<p>There will be a short term increase in emissions generated locally due to the construction activities. These emissions will be reduced through embedded mitigation measures set out in the oCEMP <b>[APP-207]</b> and summarised as follows:</p> <ul style="list-style-type: none"> <li>• Adoption of industry best practice measures</li> <li>• Encouraging the use of lower carbon modes of transport</li> <li>• Implementing a travel plan to reduce the use of private car journeys by construction staff and employees</li> <li>• Liaising with construction personnel for potential to implement staff minibuses and car sharing options</li> <li>• Preventing idling vehicles and ensuring that all construction vehicles conform to current EU emissions standards</li> <li>• Conducting regular and planned maintenance of construction plant and machinery to optimise efficiency</li> </ul> <p>The carbon footprint associated with construction of the panels themselves has not been assessed in isolation. Over the long-term, the reduction in greenhouse gas emissions achieved by the Proposed Development, when taking into account the alternative scenario of equivalent electricity being generated by higher carbon impact forms of</p>

			<p>electricity generation, such as Combined Cycle Gas Turbines, will significantly outweigh the construction phase impacts.</p> <p>The IPCC estimate of lifetime emissions of 48 kgCO<sub>2</sub>eq/MWh for utility scale solar generation (based on the median value from a range of 8 to 180 kgCO<sub>2</sub>e/MWh), which includes embedded emissions in materials and the construction phase, is significantly lower than that for generation by Combined Cycle Gas Turbines and has been taken into account in the Applicant's assessments.</p> <p><b>Figure 7.3</b> of the <b>Statement of Need [APP-202]</b> shows that carbon emissions from electricity generation would be higher if solar developments did not come forwards at the rate that National Grid project is required, than they would be if solar development follows National Grid's projections.</p> <p>The Application was accompanied by a Climate Change assessment at Chapter 13 of the ES <b>[APP-043]</b>. This took a very conservative approach to the Green House Gas (GHG) effects of the Proposed Development and concluded (at paragraph 13.4.18) that the CO<sub>2</sub> emissions of the Proposed Development would be displaced within approximately 10.5 years, and all savings beyond that would be a net benefit of the Proposed Development to reducing climate change, relative to the baseline. Over 40 years, for</p>
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				<p>example, the saving is estimated at approximately 1.9 million tonnes of CO<sub>2</sub>.</p> <p>This assessment took into account the CO<sub>2</sub> involved in the production of panels and components, construction and decommissioning of the solar farm.</p>
Climate Change	Impacts on food security	Concern that climate change is affecting food security. This will be exacerbated by the use of agricultural land for the Proposed Development.	RR-0944, RR-0088, RR-0661, RR-0289, RR-1221, RR-1183, RR-1169, RR-1167, RR-1132, RR-1074, RR-1059, RR-1039, RR-0995, RR-0980, RR-0939, RR-0937, RR-0929, RR-0867, RR-0839, RR-0831, RR-0830, RR-0818, RR-0809, RR-0778, RR-0760, RR-0715, RR-0690, RR-0666, RR-0625, RR-0576, RR-0553, RR-0467, RR-0454, RR-0452, RR-0448, RR-0436, RR-0397, RR-0332, RR-0301, RR-0294, RR-0275, RR-0257, RR-0251, RR-0182, RR-0157, RR-0102, RR-0083, RR-0024, RR-0021, RR-1194, RR-1163, RR-1146, RR-1139, RR-11333, RR-1110, RR-1089, RR-1053, RR-1036, RR-1033, RR-0963, RR-0857, RR-0807, RR-0785, RR-0726, RR-0662, RR-0646, RR-0565, RR-0483, RR-0422, RR-0363, RR-0325, RR-0312, RR-0300, RR-0228, RR-0220, RR-0175, RR-0169, RR-0145, RR-0088, RR-0035, RR-0027, RR-0010, RR-1206, RR-0970, RR-0938, RR-0913, RR-0833, RR-0787, RR-0751, RR-0612, RR-0611, RR-0596, RR-0535, RR-0521, RR-0489, RR-0468, RR-0444, RR-0427, RR-0392, RR-0391, RR-0341, RR-0287, RR-0161, RR-0159, RR-0107, RR-0069, RR-1137, RR-1114.	<p>The great majority of the land will not be affected by the installation of panels as part of the Proposed Development. An assessment of the areas affected by tracks, solar stations and the substation is set out in the ES Chapter 12 at Table 12-6 <b>[APP-042]</b>. The area extends to 0.5ha of Grade 2 and 3.7ha of sub-grade 3a land within the Best and Most Versatile agricultural land definition.</p> <p>An assessment of the food production and economic implications of the use of the BMV land for the Proposed Development compared to the production from poorer quality land are set out in the ES at sections 12.4.83 and Table 12-11 <b>[APP-042]</b>.</p> <p>The incremental reduction of crop production from the BMV land compared to non-BMV land is of the order of 250 tonnes (ES 12.4.84) from an annual production of 21million tonnes (ES 12.4.76).</p> <p>The land is not lost, except for the small areas noted above, and therefore there is no cumulative effect on agricultural land, as set out in the ES Chapter 12 at 12.8 <b>[APP-042]</b>.</p>



				In short, therefore, the Proposed Development does not impact upon the UK's food security, which is not in any event a planning policy matter.
Climate Change		Concerns that the Proposed Development will not positively contribute to tackling climate Change.	RR-0781, RR-0889.	<p><b>Section 3.3</b> of the <b>Statement of Need [APP-202]</b> describes Government's view that large capacities of low-carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar".</p> <p><b>Section 8.5</b> of the <b>Statement of Need [APP-202]</b> describes the Applicant's view (and this aligns with Government's view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p> <p>The Application was accompanied by a Climate Change assessment at Chapter 13 of the ES [<b>APP-043</b>].</p> <p>This took a very conservative approach to the Green House Gas (GHG) effects of the Proposed Development and concluded (at paragraph 13.4.18) that the CO<sub>2</sub> emissions of the Proposed Development would be displaced within approximately 10.5 years, and all savings beyond that would be a net benefit of the Proposed Development to reducing climate change, relative to the baseline. Over 40 years, for</p>

				<p>example, the saving is estimated at approximately 1.9 million tonnes of CO<sub>2</sub>.</p> <p>This assessment took into account the CO<sub>2</sub> involved in the production of panels and components, construction and decommissioning of the solar farm.</p>
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## Air Quality and Noise Levels

Topic	Theme	Summary of points raised	RR reference	MPSF's Response
Noise and Air Quality	Noise levels	Concern that the Proposed Development will increase the noise levels within the surrounding area.	RR-0052, RR-0723, RR-0109, RR-0657, RR-0278, RR-0786, RR-0600, RR-0986, RR-0103, RR-0950, RR-1159, RR0191, RR-1160, RR-0883, RR-0333, RR-1221, RR-1149, RR-1079, RR-0974, RR-0546, RR-0509, RR-0375, RR-0282, RR-0275, RR-0253, RR-0235, RR-0020, RR-1163, RR-0871, RR-0851, RR-0683, RR-0355, RR-0312, RR-0193, RR-0088, RR-0027, RR-1190, RR-0907, RR-0728, RR-0310, RR-0268, RR-1114, RR-1104.  RR-0408, RR-0567	A detailed and robust noise and vibration assessment has been undertaken in Chapter 10: Noise and Vibration of the Environmental Statement [APP-040] This includes a robust assessment of the potential noise and vibration effects during the construction and decommissioning phases, on a worst-case basis considering the predicted noise levels at the closest point to noise-sensitive receptors for each potential noise-generating activity that could occur within each of the relevant Works Area.  The potential impacts of noise during construction and decommissioning phases of the Proposed Development are temporary and the assessment found at paragraph 10.13 that with the relevant mitigation measures in place no significant adverse noise and vibration effects are expected during the construction and decommissioning phases. Operational noise created by the Proposed Development was assessed in line with relevant standards and guidance in Chapter 10 of the ES [APP-040] taking into account the nature of the baseline character of the noise environment in the area. The assessment's findings at paragraph 10.13 were that with the implementation of the relevant mitigation measures, no significant adverse noise and vibration effects are expected during the operational phase.
Noise and Air Quality	Air Quality levels	Concern that the Proposed Development will result in poorer air quality areas	RR-0557, RR-1221, RR-0253, RR-1040, RR-0851, RR-1206,	The Applicant has assessed the potential effects of the Proposed Development on Air Quality in the

		within the surrounding vicinity of the Site.		<p>Environmental Statement (Chapter 15: Other Environmental Topics <b>[APP-045]</b>).</p> <p>The assessment sets out how potential dust and non-road mobile machinery (NRMM) emissions will be controlled via the oCEMP and oDEMP for the construction and decommissioning phases, respectively.</p> <p>In addition, traffic flows are expected to be below the Environmental Protection UK and Institute of Air Quality Management thresholds for significant effects during the construction, operational and decommissioning phases.</p> <p>As such, the assessment concludes the Proposed Development is not expected to cause any significant adverse effects in respect of air quality.</p>
Noise and Air Quality	Pollution levels	Concern that the Proposed Development will increase levels of pollution for locals which could be fatal for many.	RR-0786, RR-1160, RR-0867, RR-0509, RR-1163, RR-0968, RR-0956, RR-1206, RR-0397, RR-0408, RR-0454, RR-0622, RR-0645, RR-0808, <u>RR-0926</u>	<p>The Applicant has assessed the potential effects of the Proposed Development on Air Quality in the Environmental Statement (Chapter 15: Other Environmental Topics <b>[APP-045]</b>).</p> <p>The assessment sets out how potential dust and non-road mobile machinery (NRMM) emissions will be controlled via the oCEMP and oDEMP for the construction and decommissioning phases, respectively.</p> <p>In addition, traffic flows are expected to be below the Environmental Protection UK and Institute of Air Quality Management thresholds for significant effects during the construction, operational and decommissioning phases.</p>

				As such, the assessment concludes the Proposed Development is not expected to cause any significant adverse effects in respect of air quality.
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## Decommissioning Impacts

Topic	Theme	Summary of points raised	RR reference	MPSF's Response
Decommissioning	Post-development	Further information and clarification on the next steps for the Site and equipment following the end of the Proposed Development.	RR-0691, RR-0773, RR-0109, RR-0410, RR-1128, RR-1166, RR-0911, RR-0280, RR-0600, RR-0327, RR-0328, 0680, RR-1156, RR-1217, RR-0001, RR-0511, RR-0710, RR-0986, RR-0727, RR-0865, RR-1195, RR-0682, RR-0071, RR-0144, RR-0669, RR-1159, RR-0388, RR-1208, RR-0233, RR-0316, RR-0462, RR-1169, RR-1149, RR-1038, RR-0999, RR-0867, RR-0677, RR-0666, RR-0546, RR-0509, RR-0454, RR-0397, RR-0296, RR-0257, RR-0240, RR-0151, RR-0043, RR-0034, RR-1181, RR-1123, RR-0968, RR-0851, RR-0726, RR-0646, RR-0579, RR-0483, RR-0402, RR-0300, RR-0193, RR-1190, RR-0938, RR-0877, RR-0832, RR-0515, RR-0337, RR-1029.	<p>All the solar infrastructure including PV modules, mounting structures, cabling on or near the surface, inverters, transformers, switchgear, fencing, ancillary infrastructure and the Onsite Substation would be removed and recycled or disposed of in accordance with good practice following the waste hierarchy, with materials being reused or recycled wherever possible. All waste will be disposed of in accordance with the legislation at the time of decommissioning.</p> <p>Any requirement to leave the internal access tracks would be discussed and agreed upon with the landowners at the time of decommissioning. The Solar PV Site would be reinstated in accordance with a Decommissioning Environmental Management Plan (DEMP). The DEMP will be required to be in accordance with the outline Decommissioning Environmental Management Plan (oDEMP) [APP-209].</p> <p>The DEMP will be subject to the approval of the local planning authorities. It is likely that decommissioning would include the removal of any permissive paths and the potential reversion of grassland underneath the PV Arrays.</p>

## Access – Public Right of Ways and Permissive Paths

Topic	Theme	Summary of points raised	RR reference	MPSF's Response
Access	Permissive Paths	Concern that the permissive paths included within the Proposed Development will not be available and useable throughout the whole timeline of the Development.	RR-0708, RR-0484, RR-1038, RR-0509, RR-0020, RR-1163, RR-0016, RR-0938, RR-0288	A total of 8.1km of new permissive paths form part of the proposed development, creating new routes to previously non-publicly accessible areas and improving wider PRoW network connectivity. Their provision is secured through the DCO for the lifetime of the development.
Access	ProWs and Bridleways	Concern of the impact that the Proposed Development will have upon the ProW network. Particularly focusing upon concerns surrounding the disruption and degradation that the Proposed Development will have for the users of this network.	RR-0394, RR-0756, RR-1136, RR-0653, RR-0017, RR-0723, RR-0109, RR-0647, RR-1042, RR-1047, RR-0094, RR-0915, RR-0318, RR-0559, RR-0507, RR-0600, RR-0047, RR-0327, RR-0328, RR-0680, RR-1156, RR-1217, RR-0668, RR-1055, RR-0133, RR-1195, RR-0532, RR-0682, RR-0122, RR-0144, RR-1000, RR-1159, RR-1168, RR-0388, RR-0803, RR-0954, RR-1112, RR-1118, RR-1193, RR-0285, RR-0371, RR-0745, RR-0090, RR-0331, RR-1183, RR-1132, RR-1049, RR-1039, RR-1038, RR-0867, RR-0830, RR-0765, RR-0666, RR-0610, RR-0607, RR-0570, RR-0546, RR-0541, RR, 0509, RR-0465, RR-0403, RR-0397, RR-0269, RR-0264, RR-0240, RR-0020, RR-1181, RR-1163, RR-1110, RR-1093, RR-0968, RR-0963, RR-0960, RR-0949, RR-0325, RR-0312, RR-0300,	<p>All existing PRoW will be retained in their existing alignment. Whilst temporary closures may be needed during construction, no permanent closures are proposed.</p> <p>As set out in the outline Construction and Environmental Management Plan (oCEMP) [APP-207], access to all existing PRoW will be retained during the construction phase, with a limited number of temporary PRoW diversions to allow the construction of access tracks where they cross PRoW. The PRoW will be managed throughout the construction phase to ensure that they can continue to be used safely.</p> <p>In addition, a total of 8.1km of new permissive paths form part of the proposed development, creating new routes to previously non-publicly accessible areas and improving wider PRoW network connectivity.</p> <p>An Amenity and Recreation Assessment was undertaken and is presented in the ES Chapter 6</p>

			<p>RR-0201, RR-0145, RR-0035, RR-0027, RR-0938, RR-0877, RR-0515, RR-0453, RR-0444, RR-0357, RR-0258, RR-0095, RR-1178, RR-1137, RR-1114, RR-1104, RR-1094.</p> <p>RR-0397, RR-0408, RR-0454, RR-0771</p>	<p>Appendix 6.5 <b>[APP-058]</b> which concluded that whilst impacts to PRow within the site during construction would be significant, operation impacts would not be significant following mitigation post 15 years when mitigation planting has matured. In relation to the two PRow within the Solar PV Site where this is not the case (Bridleways E169 and E182) offsets of at least 15m are proposed along with new planting so that overtime the impact on the recreational amenity of these routes will reduce (although still acknowledged to be significant in LVIA terms).</p> <p>The assessment of potential impacts on tourism during the construction, operation and decommissioning phases is undertaken as part of the socio-economics assessment provided in chapter 14 of the Environmental Statement <b>[APP-044]</b>. It concludes that, given the only adverse effects would be experienced by users of PRow within and closest to the Order limits and that accommodation providers could potentially benefit from additional income from staying workers, it is considered that, on balance, the construction phase will have a negligible to minor adverse effect on tourism. It is also considered that the presence of the Proposed Development would only have a negligible to minor adverse effect on tourism during the operational phase, which is not significant.</p>
Access	Bridleways	Concerns around the closure of one or two bridleways in the area. Further information requested on whether	RR-1215, RR-1042, RR-0764, RR-0509, RR-0300, RR-0938,	All existing PRow will be retained in their existing alignment. Whilst temporary closures may be needed during construction, no permanent closures are proposed.



		additional bridleways will be implemented.		<p>As set out in the outline Construction and Environmental Management Plan (oCEMP) [APP-207], access to all existing PRoW will be retained during the construction phase, with a limited number of temporary PRoW diversions to allow the construction of access tracks where they cross PRoW. The PRoW will be managed throughout the construction phase to ensure that they can continue to be used safely.</p> <p>The 8.1km of permissive paths to be created by the Proposed Development will be able to be used by equestrians during its lifetime.</p>
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### Planning Policy and Consenting Strategy

Topic	Theme	Summary of points raised	RR reference	MPSF's Response
Planning Policy	SKDC Policy	Lack of consideration for SKDCs criteria for Solar development. Proposed Development should be revised against this criteria.	RR-0772	Appendix 3 of the Planning Statement [APP-203] sets out the Applicant's assessment against these criteria, and concludes that the Proposed Development is consistent with them.
Planning Policy	Environment Act	Lack of consideration of the Government Environmental Act within the Proposed Development.	RR-0290	The most relevant aspect of the Environment Act 2021 to the Proposed Development are the provisions relating to biodiversity net gain, which are not yet in force, but which the Applicant has taken into account in any event in the design of its GI strategy. As set out in the BNG Metric submitted with the Application [APP-064], overall, the Proposed Development results in a net gain for both habitats (72.19%) and hedgerow (40.83%). There is a 0% change for river units
Planning Policy	National Policy	The Proposed Development has a lack of consideration for the national policies on renewables and the National Planning Policy Framework (NPPF). In addition, it hasn't considered the	RR-0590, RRR-0139, RR-0538, RR-0280, RR-0600, RR-133, RR-0609, RR-0120, RR-0996, RR-0478, RR-1038, RR-0830, RR-0546, RR-0301, RR-0240, RR-0020, RR-0861, RR-0703, RR-0519, RR-0495, RR-0029, RR-0702, RR-0781, RR-0408, RR-1014.	Section 3.3 of the Statement of Need [APP-202] describes Government's view that large capacities of low-carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar".

		evolving government policy.		<p><b>Section 8.5</b> of the <b>Statement of Need</b> describes and agrees with Government’s view that decentralised and community energy systems are unlikely to lead to the significant replacement of large-scale infrastructure. It is the Applicant’s view (and this aligns with Government’s view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p> <p><b>Section 8</b> of the <b>Planning Statement [APP-203]</b> concludes with a consideration of the Planning Balance and justifies how the overwhelming national need, as demonstrated in the <b>Statement of Need</b> outweighs any potential significant adverse impacts which, as the <b>Environmental Statement</b> sets out, are limited.</p> <p>Crucially, the Planning Statement and Statement of Need also set out how the Proposed Development is compliant with current and proposed national and local planning policy.</p>
Planning Policy	Wider national policies	Lack of consideration within the Proposed Development for the wider governmental policies, including food security and mental health/wellbeing policies.	RR-0572, RR-0761, RR-0781	<p>Chapter 1: Introduction of the <b>Environmental Statement [APP-031]</b> and <b>Section 3.2</b> of the <b>Planning Statement [APP-203]</b> provides the policy context relevant to the Proposed Development. <b>Section 3.3</b> of the <b>Planning Statement</b> provides the context in which the Proposed Development is meeting policy objectives.</p> <p><b>Section 7.6</b> of the <b>Statement of Need [APP-202]</b> analyses the potential contribution of “brownfield” solar sites to the national need for solar generation. Brownfield sites, including rooftop and other</p>

				<p>community energy systems, are likely to grow in the UK and will make a contribution to decarbonisation of the UK energy system. However the <b>Statement of Need</b> concludes that on their own, brownfield developments are unlikely to be able to meet the national need for solar.</p> <p><b>Section 8.5</b> of the <b>Statement of Need</b> describes and agrees with Government's view that decentralised and community energy systems are unlikely to lead to the significant replacement of large-scale infrastructure. It is the Applicant's view (and this aligns with Government's view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p> <p>Consideration of the food production and economic implications of the use of the BMV land for the Proposed Development compared to the production from poorer quality land are set out in the ES at sections 12.4.83 and Table 12-11 <b>[APP-042]</b>.</p> <p>The incremental reduction of crop production from the BMV land compared to non-BMV land is of the order of 250 tonnes (ES 12.4.84) from an annual production of 21million tonnes (ES 12.4.76).</p> <p>The economic implications (benefits) for local farms and the increased local farm labour needed for managing the sheep is set out in the ES Chapter 12 at paragraphs 12.4.96 and 12.4.97 <b>[APP-042]</b>.</p> <p>The land is not lost, except for the small areas noted above, and therefore there is no cumulative effect</p>
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				<p>on agricultural land, as set out in the ES Chapter 12 at 12.8 [APP-042].</p> <p>The Environmental Statement has also assessed the <u>potential effects of the construction phases</u> of the Proposed Development in relation to impacts to wellbeing through the assessment of noise, air quality, amenity and recreation and traffic assessments, all of which conclude that no likely significant effects are expected to arise, with mitigation measures secured through the oCEMP [APP-207] and oCTMP [APP-212] taken into account.</p>
Planning Policy	Policy impact on locals	The national policy does not hold any consideration for the local residents in areas where renewable projects are being proposed.	RR-0835, RR-0929,	<p>Chapter 1: Introduction of the <b>Environmental Statement [APP-031]</b> and <b>Section 3.2</b> of the <b>Planning Statement [APP-203]</b> provides the policy context relevant to the Proposed Development. <b>Section 3.3</b> of the <b>Planning Statement</b> provides the context in which the Proposed Development is meeting policy objectives.</p> <p><b>Section 8.5</b> of the <b>Statement of Need [APP-202]</b> describes and agrees with Government’s view that decentralised and community energy systems are unlikely to lead to the significant replacement of large-scale infrastructure. It is the Applicant’s view (and this aligns with Government’s view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p> <p><b>Section 10.3</b> of the <b>Statement of Need [APP-202]</b> describe how solar is already highly competitive against current conventional and renewable generation costs, is predicted to retain a cost</p>

				<p>advantage for the decades ahead. Further, <b>Section 10.2</b> describes how the deployment of solar generation capacity in the UK reduces the traded price of electricity in the UK and that has benefit for all consumers.</p> <p>The Applicant sought to include benefits to the local community from the inception of the Project and has taken a design-led approach to the overall masterplan, including substantial Green Infrastructure commitments from an early date, including opening up of pedestrian walkways along a new river corridor on the West Glen River. This approach is set out in the <b>Design and Access Statement [APP-204]</b>. This approach to ensuring good design in infrastructure developments is also a policy requirement in NPS EN1 (section 4.5).</p> <p>Whilst not a direct local benefit, there is benefit to all UK citizens from the UK producing more clean, renewable electricity, in terms of affordability and energy security and resilience. This is considered further in the <b>Statement of Need [APP-202]</b>.</p>
Planning Policy	Lack of local support	Local residents do not support national renewable energy policies. No benefits for those living in the surrounding areas.	RR-0942, RR-1074, RR-0467, RR-0898, RR-	<b>Section 8.5</b> of the <b>Statement of Need</b> describes and agrees with Government's view that decentralised and community energy systems are unlikely to lead to the significant replacement of large-scale infrastructure. It is the Applicant's view (and this aligns with Government's view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.

				<p><b>Section 10.3</b> of the <b>Statement of Need [APP-202]</b> describes how solar is already highly competitive against current conventional and renewable generation costs, is predicted to retain a cost advantage for the decades ahead. Further, <b>Section 10.2</b> describes how the deployment of solar generation capacity in the UK reduces the traded price of electricity in the UK and that has benefit for all consumers.</p> <p>The Applicant sought to include benefits to the local community from the inception of the Project and has taken a design-led approach to the overall masterplan, including substantial Green Infrastructure commitments from an early date, including opening up of pedestrian walkways along a new river corridor on the West Glen River. This approach is set out in the <b>Design and Access Statement [APP-204]</b>. This approach to ensuring good design in infrastructure developments is also a policy requirement in NPS EN1 (section 4.5).</p> <p>The Applicant sought to include benefits to the local community from the inception of the Project and has taken a design-led approach to the overall masterplan, including substantial Green Infrastructure commitments from an early date, including opening up of pedestrian walkways along a new river corridor on the West Glen River. This approach is set out in the Design and Access Statement [<b>APP-204</b>]. This approach to ensuring good design in infrastructure developments is also a policy requirement in NPS EN1 (section 4.5).</p>
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				<p>The Proposed Development will be sensitively sited and offset from residential properties through 50m offsets for solar stations from PRowS and 250m offset of solar stations from residential properties All existing PRowS will be retained in their existing alignment and complemented by a total of 8.1km of new permissive paths that link to wider network and creating joined up routes. There will be a 15m offset from PRowS to the edge of the Solar PV Site with appropriate screening planting to manage the amenity of PRowS. The Proposed Development will create opportunities for people to engage with the natural world in the form of nature areas, viewing hides and interpretation boards.</p> <p>Whilst not a direct local benefit, there is benefit to all UK citizens from the UK producing more clean, renewable electricity, in terms of affordability and energy security and resilience. This is considered further in the <b>Statement of Need [APP-202]</b>.</p>
Planning Statement	Consenting Strategy	Concerns around the duration of the project and no indicated operational time limit and how the decommissioning of the Proposed Development will be enforced.	RR-0043, RR-0397, RR-0454, RR-0771	<p>Paragraph 3.10.56 of draft NPS EN-3 provides that although an upper limit of 40 years is typical, applicants may seek consent without a time-period.</p> <p>Chapter 5 of the Environmental Statement <b>[AS-010]</b> states that the EIA has been carried out on the basis that the Proposed Development is permanent, to ensure a worst-case assessment of likely effects.</p>



				<p>Whilst the EIA has assessed the operational impacts of the Proposed Development as permanent, it is the case that any impacts related to the use of the land are considered to be reversible, pursuant to the management plans secured by the DCO.</p> <p>The ES has not identified any specific project impact which would require the Proposed Development to be linked to a specific operational timeframe. It is also the case that as technology improves, design lifetimes are likely to increase. Therefore, the Applicant is not seeking a time limited consent.</p> <p>However, whilst a time limited consent is not sought, it is anticipated that the development will be decommissioned at some point in the future, as the Applicant is not proposing any systematic repowering or wholesale replacement of PV modules or other infrastructure. Paragraph 3.10.59 of draft NPS EN-3 acknowledges that decommissioning can be achieved relatively easily and cheaply.</p> <p>For the purposes of assessing decommissioning with the ES, it has been assumed that the Proposed Development would take place after 40 years, although it is noted that decommissioning could take</p>
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				<p>place prior to or after this timeframe subject to how the technology is performing at the time.</p> <p>It also noted that in the government's consultation response to the draft NPSs (dated March 2023), the government stated that it does not agree that solar DCOs should be limited to a maximum specified period and the draft revised NPS EN-3 makes clear (at paragraph 3.10.140) that applicants can apply for a non-time limited consent.</p> <p>All the solar infrastructure including PV modules, mounting structures, cabling on or near the surface, inverters, transformers, switchgear, fencing, ancillary infrastructure and the Onsite Substation would be removed and recycled or disposed of in accordance with good practice following the waste hierarchy, with materials being reused or recycled wherever possible. All waste will be disposed of in accordance with the legislation at the time of decommissioning.</p> <p>Any requirement to leave the internal access tracks would be discussed and agreed upon with the landowners at the time of decommissioning. The Solar PV Site would be reinstated in accordance with a Decommissioning Environmental Management Plan (DEMP). The DEMP will be required to be in accordance with the <b>outline Decommissioning</b></p>
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				<p><b>Environmental Management Plan (oDEMP) [APP-209]</b></p> <p>The DEMP will be subject to the approval of the local planning authorities. It is likely that decommissioning would include the removal of any permissive paths and the potential reversion of grassland underneath the PV Arrays.</p>
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## Compulsory Acquisition - General

Topic	Theme	Summary of points raised	RR reference	MPSF's Response
Land and Property	Compulsory Purchase	Concern about the sudden mention of compulsory purchases for properties/verges within the surrounding area to the Proposed Development.	RR-0055, RR-0230, RR-0723, RR-1001, RR-1215, RR-1047, RR-0630, RR-0518, RR-0852, RR-0908, RR-0583, RR-0604, RR-0600, RR-0680, RR-1156, RR-0026, RR-0986, RR-0761, RR-0682, RR-0071, RR-010., RR-0950, RR-1159, RR-1168, RR-0191, RR-0954, RR-0213, RR-1193, RR-1048, RR-0090, RR-1149, RR-1038, RR-0275, RR-0294, RR-0041, RR-1151, RR-0871, RR-0300, RR-0190, RR-0169, RR-0084, RR-0907, RR-0877, RR-0596, RR-0558, RR-0499, RR-0418, RR-1216, RR-1029, RR-1091, RR-1149,	<p>Whilst the Land Plans [APP-005] appear to show land take within properties, this is not the case. As explained in Note 2 to the Land Plans, the plot boundaries have been drawn to the Land Registry boundaries, or where it is available and differs from those boundaries, topographical survey data. The accuracy of these information sources differs from OS Base Mapping, which results in the plot boundaries and/or the Order limits not aligning with the line work shown on the OS Base Mapping.</p> <p>The description of the plots in the Book of Reference [APP-023] make clear that no properties are proposed to be subject to the land powers in the DCO.</p>
Land and Property	Compulsory Purchase	Concern about the compulsory purchase of land within the property owner's interest.	RR-0030, RR- 0524, RR-0567, RR-1149.	<p>The Applicant does not propose to compulsorily acquire any garden land. Whilst the Land Plans [APP-005] appear to show land take within properties, this is not the case. As explained in Note 2 to the Land Plans, the plot boundaries have been drawn to the Land Registry boundaries, or where it is available and differs from those boundaries, topographical survey data. The accuracy of these information</p>

				<p>sources differs from OS Base Mapping, which results in the plot boundaries and/or the Order limits not aligning with the line work shown on the OS Base Mapping.</p> <p>The description of the plots in the book of Reference [APP-023] make clear that no properties are proposed to be subject to the land powers in the DCO.</p> <p>These interests are identified as holding an interest in highway land. These interest in land are listed as the title to the relevant land is unregistered, and as a highway, it is therefore <i>presumed</i> (which is a rebuttable presumption) that these parties hold an interest in the relevant land underneath the highway under the ‘ad medium filum’ rule. It is this subsoil which is sought to be subject to the compulsory acquisition of rights for the cable corridor.</p> <p>The impacts to these parties is therefore minimal, however the Applicant is willing to discuss this issue with these parties.</p>
Land and Property	Compulsory Purchase	Lack of communication about compulsory purchases during the consultation process.	RR-0723, RR-0099, RR-0761, RR-0954, RR-1038, RR-0294, RR-0275, RR-0041, RR-0020, RR-0646, RR-0565, RR-0333, RR-	During statutory consultation in May 2022, it was made clear that the DCO Application would include compulsory acquisition powers. This was made clear within the Section 48 notice which states at paragraph 4:

			<p>0215, RR-1003, RR-0127, RR-0408, RR-1126,</p>	<p><i>“The proposed DCO will, among other things, authorise... the permanent and/or temporary acquisition of land and/or rights and overriding of easements and other rights over or affecting land”.</i></p> <p>The <b>Schedule of Negotiations and Powers Sought [APP-024]</b> provides details of the negotiations entered into before and during the consultation process. Since the submission of the Application, the Applicant has continued efforts to meet with landowners.</p> <p>The Applicant would like to agree all necessary interests by negotiation and it will continue its efforts to do so throughout the Examination.</p> <p>The Statutory Consultation did not set out the specific location of land powers sought for any plots, but indicated the works that would be undertaken in and around where residents would be taking place. This is the common approach to consultation on NSIP projects. Importantly, as is set out in the Book of Reference [APP-023], no compulsory acquisition powers are sought over residential land, but are instead limited to impacts to subsoil of adjacent highway where it is <u>presumed</u> that if title in the highway is not registered, that adjacent landowners may own the land under the highway up to the half-way point of the highway land</p>
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Land and Property	Compulsory Purchase	Further information is required about the reasoning and need for the number of compulsory purchases in the area.	RR-0080, RR-1193	<p>The Applicant considers that full reasons and justification for the inclusion of compulsory purchase powers have been detailed in the Statement of Reasons [APP-021].</p> <p>The Applicant would like to agree all necessary interests by negotiation and it will continue its efforts to do so throughout the Examination. It will regularly update the <b>Schedule of Negotiations and Powers Sought [APP-024]</b> to demonstrate this.</p> <p>The Statutory Consultation did not set out the specific location of land powers sought for any plots, but indicated the works that would be undertaken in and around where residents would be taking place. This is the common approach to consultation on NSIP projects. Importantly, as is set out in the Book of Reference [APP-023], no compulsory acquisition powers are sought over residential land, but are instead limited to impacts to subsoil of adjacent highway where it is <u>presumed</u> that if title in the highway is not registered, that adjacent landowners may own the land under the highway up to the half-way point of the highway land</p>
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## Compulsory Acquisition – Specific

Topic	Theme	Summary of points raised	RR Reference	MPSF's Response
Land and Property	Compulsory Acquisition	<p>The developers intent to request compulsory acquisition rights, on Bourne Rd, was not made clear during the consultation period. Routing of Cabling back to Substation was always described by under the land the planned scheme was using. This seems a deliberate misrepresentation included at the last minute. At No Point has [Redacted] or those acting on there behalf- highlighted or Informed us of there intention to CANCEL and / or REMOVE OUR LEGAL RIGHT to access and operate our Business and for an undisclosed / confirmed amount of time.</p>	RR-0043	<p>The Applicant does not propose to compulsory acquire any garden land. Whilst the Land Plans [APP-005] appear to show land take within properties on Bourne Road, this is not the case. As explained in Note 2 to the Land Plans, the plot boundaries have been drawn to the Land Registry boundaries, or where it is available and differs from those boundaries, topographical survey data. The accuracy of these information sources differs from OS Base Mapping, which results in the plot boundaries and/or the Order limits not aligning with the line work shown on the OS Base Mapping.</p> <p>The description of the plots in the Book of Reference [APP-023] make clear that no properties are proposed to be subject to the land powers in the DCO.</p> <p>Mr Beamish is identified as holding an interest in highway land. Mr Beamish's interest in this land is listed as the title to this land is unregistered, and as a highway, it is therefore <i>presumed</i> (which is a rebuttable presumption) that Mr Beamish hold an interest in the land underneath the highway under the 'ad medium filum' rule. It is this subsoil which is sought to be subject to the compulsory acquisition of rights for the cable corridor.</p>



				<p>The impacts to Mr Beamish in this regard are therefore minimal, however the Applicant is willing to discuss them with Mr Beamish.</p> <p>It is also recognised that Mr Beamish holds a right of way over an access track in plot 02-138. The Applicant can confirm that its impact to this access track will be limited to cabling to pass under this track, meaning that this right of way will be continue to be able to be utilised during operation of the scheme; and any impacts will be able to be managed during the construction phase to enable access to be maintained.</p>
Land and Property	Compulsory Acquisition	The grass area in front of our property is our responsibility to maintain as included within our property deeds.	RR-0808	<p>Further to this representation, the Applicant acknowledges that Mrs Leaper’s interest in plot 02-124 made up of two elements:</p> <p>Firstly, having considered in detail the title position, it is recognised that Mrs Leaper holds a right to access and maintain the grass area forming part of plot 02-124 and this interest will be represented in the next iteration of the Book of Reference as a Category 2 interest. This interest will be appear in the Book of Reference alongside the existing Category 1 subsoil interest mentioned below. The Applicant notes that the grass area in question is located outside of the front wall of Mrs Leaper’s property, and adjacent to the pavement and</p>

				<p>therefore has the appearance of a highway verge highway verge.</p> <p>Secondly, Mrs Leaper is identified as holding an interest in the highway land adjacent to her property. Mrs Leaper's This interest in this plot is listed as the title to this land is unregistered, and as a highway, it is therefore presumed (which is a rebuttable presumption) that Mrs Leaper hold an interest in the land underneath the highway under the 'ad medium filum' rule.</p> <p>The Applicant's compulsory acquisition of rights proposals relate to cabling to be installed in the subsoil of the highway land and potentially of the grass area. In both instances, it is considered the impacts to Mrs Leaper are limited, and do not impact upon the residential use of her property as a whole.</p> <p>If the grass area noted above is impacted whilst the cables are being laid, it will be reinstated to a suitable condition once the works have been completed, which is a requirement of the temporary possession power of the DCO, which would likely be utilised prior to the full compulsory acquisition of rights powers. The details of these cabling works will be outlined within the final CEMP and CTMP, with suitable notice given to all affected parties prior to the commencement of any works.</p>
Land and Property	Compulsory Acquisition	The compulsory acquisition rights look set to potentially alter, disrupt	RR-0771	There are no proposals to alter, disrupt or extinguish any of Mr Chapman's access points.

		<p>or extinguish various access points to my property along the roadside affected. How will I know what the exact implications are over a two-year period (and maybe longer) for my day-to-day activities? Will there be any protections in place to preserve my own rights of access and use of the public road on which I completely depend? What safety measures will exist to ensure all the road users properly adhere to the inevitable variable traffic management procedures?</p>	<p>Mr Chapman is identified as holding an interest in highway land. Mr Chapman's interest in this land is listed as the title to this land is unregistered, and as a highway, it is therefore <i>presumed</i> (which is a rebuttable presumption) that Mr Chapman hold an interest in the land underneath the highway under the 'ad medium filum' rule. The area of highway land is proposed to be subject to temporary possession powers to enable the Applicant to undertake highways improvements to facilitate access to land to the west of the highway and are therefore unlikely to affect the subsoil and in any event, have a minimal impact on Mr Chapman's property interests.</p> <p>There may be a need for temporary traffic measures near to Mr Chapman's Property to accommodate these access works, which will include traffic signals and speed limit reductions to 30mph. Throughout these works, it will be ensured that appropriate access is maintained to the property at all times. Whilst the details are yet to be confirmed, it is expected this will be over a short duration (e.g. assumed to be over a number of days/weeks, rather than months) and will be mitigated further through the supporting management plans, including the final CEMP and CTMP, which are secured by Requirement 11 and 13 of the draft DCO respectively.</p> <p>The details of the temporary traffic measures will be agreed with the Local Highway</p>
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				<p>Authorities and any stakeholders prior to the commencement of any works to ensure that appropriate access is maintained for all properties. There will be communications provided through the CEMP/CTMP to inform all parties on the nature of the works and any implications.</p> <p>This information will be detailed within the final CTMP, secured by way of Requirement 13 of the DCO. <b>[APP-212]</b>.</p>
Land and Property	Compulsory Acquisition / Consultation	The proposed site will engulf our property starting at the beginning of our adopted road - The Drift off the B1176. It will proceed near our north boundary effecting many aspects of our environment. Our lives will be effected visually and materially thus degrading our quality of life. As pointed out previously, the planners had not been out to our property before the first consultation and this confirms that there was little planning and thought considered about the effect the proposal would have on [Redacted]. If the proposed solar farm goes ahead our immediate environment will change entirely.	RR-0752	<p>The Applicant has engaged with the Charrington family and as a result the application for the Proposed Scheme developed from Stage 2 consultation to include setbacks from their property.</p> <p>The nearest solar areas to the north and west are now separated from the Scheme by the length of a field and existing hedgerows.</p> <p>As a result, the Scheme is not considered to impact upon the Residential Visual Amenity of their residence.</p>
Land and Property	Compulsory Acquisition	Compulsory purchase.	RR-1155	The use and application of compulsory acquisition powers is considered the last resort

			<p>to secure the land and rights needed for the Proposed Development.</p> <p>Where the Applicant is seeking powers of compulsory acquisition, the Applicant's preference is to negotiate the acquisition of land and / or interests in land and enter into voluntary agreement with the landowner. The Applicant remains committed to acquiring all land and rights by voluntary agreement in the first instance, however it requires the powers of compulsory acquisition sought in order to provide certainty that they will have all the land required to construct and operate the Proposed Development.</p> <p>Whilst the <b>Land Plans [APP-005]</b> appear to show land take within properties on Bourne Road, this is not the case. As explained in Note 2 to the Land Plans, the plot boundaries have been drawn to the Land Registry boundaries, or where it is available and differs from those boundaries, topographical survey data. The accuracy of these information sources differs from OS Base Mapping, which results in the plot boundaries and/or the Order limits not aligning with the line work shown on the OS Base Mapping.</p> <p>The description of the plots in the <b>Book of Reference [APP-023]</b> make clear that no properties are proposed to be subject to the land powers in the DCO.</p>
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				<p>The Reeds are identified as holding an interest in highway land. The Reeds' interest in this land is listed as the title to this land is unregistered, and as a highway, it is therefore <i>presumed</i> (which is a rebuttable presumption) that the Reeds hold an interest in the land underneath the highway under the 'ad medium filum' rule. It is this subsoil which is sought to be subject to the compulsory acquisition of rights for the cable corridor.</p> <p>The impacts to the Reeds are therefore minimal, however the Applicant is willing to discuss them with the Reeds.</p>
Land and Property	Access to private properties	[Redacted] The proposed limiting restrictions of access to my property, for any vehicles, is of huge concern. As a senior working gentleman, I need essential vehicular access to and from my property on a regular basis.	RR-0926	<p>There may be a need for temporary traffic measures to accommodate cabling works, which will include traffic signals and speed limit reductions to 30mph. Throughout these works, it will be ensured that appropriate access is maintained to the property at all times. Whilst the details are yet to be confirmed, it is expected this will be over a short duration (e.g. assumed to be over a number of days/weeks, rather than months) and will be mitigated further through the supporting management plans, including the final CEMP and CTMP. The details of the temporary traffic measures will be agreed with the Local Highway Authorities and any stakeholders prior to the commencement of any works to ensure that appropriate access is maintained for all properties. There will be communications provided through the CEMP/CTMP to inform all parties on the nature of the works and any</p>

				<p>implications.</p> <p>This information will be detailed within the final CTMP, secured by way of requirement on the DCO. <b>[APP-212]</b>.</p> <p>Further to this representation, the Applicant acknowledges that Mr Leaper's interest in plot 02-124 is made up of two elements:</p> <p>Firstly, having considered in detail the title position, it is recognised that Mr Leaper holds a right to access and maintain the grass area forming part of plot 02-124 and this interest will be represented in the next iteration of the Book of Reference as a Category 2 interest. This interest will be appear in the Book of Reference alongside the existing Category 1 subsoil interest mentioned below. The Applicant notes that the grass area in question is located outside of the front wall of Mr Leaper's property, and adjacent to the pavement and therefore has the appearance of a highway verge.</p> <p>Secondly, Mr Leaper is identified as holding an interest in the highway land adjacent to his property. This interest <i>is listed as the title to this land is unregistered, and as a highway, it is therefore presumed (which is a rebuttable presumption) that Mr Leaper hold an interest in the land underneath the highway under the 'ad medium filum' rule.</i></p>
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				<p>The Applicant's compulsory acquisition of rights proposals relate to cabling to be installed in the subsoil of the highway land and potentially of the grass area. In both instances, it is considered the impacts to Mr Leaper are limited, and do not impact upon the residential use of his property as a whole.</p> <p>If the grass area noted above is impacted whilst the cables are being laid, it will be reinstated to a suitable condition once the works have been completed, which is a requirement of the temporary possession power of the DCO, which would likely be utilised prior to the full compulsory acquisition of rights powers. The details of these cabling works <i>will be outlined within the final CEMP and CTMP, with suitable notice given to all affected parties prior to the commencement of any works.</i></p>
Land and Property	Compulsory Acquisition	I live on the road with compulsory acquisition of which there was no mention at the earlier stages. The worry and fear of invasion seems to rule our life's at the moment. We have lived in the village for 25 years.	RR-1126	<p>During statutory consultation in May 2022, it was made clear that the DCO Application would include compulsory acquisition powers. This was made clear within the Section 48 notice which states at paragraph 4:</p> <p><i>"The proposed DCO will, among other things, authorise... the permanent and/or temporary acquisition of land and/or rights and overriding of easements and other rights over or affecting land".</i></p>



			<p>Section 42 notices were sent in June 2022 to all affected residents notifying them of the Proposed Development.</p> <p>The Applicant does not propose to compulsory acquire any garden land. Whilst the Land Plans [APP-005] appear to show land take within properties on Bourne Road, this is not the case. As explained in Note 2 to the Land Plans, the plot boundaries have been drawn to the Land Registry boundaries, or where it is available and differs from those boundaries, topographical survey data. The accuracy of these information sources differs from OS Base Mapping, which results in the plot boundaries and/or the Order limits not aligning with the line work shown on the OS Base Mapping.</p> <p>The description of the plots in the Book of Reference [APP-023] make clear that no properties are proposed to be subject to the land powers in the DCO.</p> <p>Mrs Smalley is identified as having an interest in highway land, being Bourne Road, which is part of the cable corridor through Essendine Village. Mrs Smalley's interest in this plot is listed as the title to this land is unregistered, and as a highway, it is therefore <i>presumed</i> (which is a rebuttable presumption) that Mrs Smalley holds an interest in the land underneath the highway</p>
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				<p>under the 'ad medium filum' rule. It is this subsoil which is sought to be subject to the compulsory acquisition of rights for the cable corridor.</p> <p>The impacts to Mrs Smalley are therefore minimal, however the Applicant is willing to discuss them with Mrs Smalley</p> <p><b>The Schedule of Negotiations and Powers Sought [APP-024]</b> provides details of the negotiations entered into with landowners prior to submission of the Application. The Applicant will continue efforts to meet with landowners and continue discussions.</p>
Land and Property	Compulsory Acquisition	As a farmer and landowner I feel blackmailed by the compulsory purchase provisions which are being applied for. I have spent 40+ years improving the landscape and feel through owning the land I can prevent inappropriate developments on it.	RR-1216	<p>The use and application of compulsory acquisition powers is considered the last resort to secure the land and rights needed for the Proposed Development.</p> <p>Where the Applicant is seeking powers of compulsory acquisition, the Applicant's preference is to negotiate the acquisition of land and / or interests in land and enter into voluntary agreement with the landowner.</p> <p>Mr Williams is the freeholder of plots 01-01 and 02-03 and the Applicant has been negotiating with him and his wider family as set out in the</p>

				<p>Schedule of Negotiations and Powers Sought [APP-024].</p> <p>All other interests of Mr Williams identified in the Book of Reference relate to presumed subsoil interests in highway land, where the Applicant seeks only to compulsorily acquire rights for cabling within the subsoil.</p>
Land and Property	Compulsory Acquisition	We are worried that they are going to take your garden land.	RR-0108	<p>The Applicant does not propose to compulsorily acquire any garden land. Whilst the Land Plans [APP-005] appear to show land take within properties, this is not the case. As explained in Note 2 to the Land Plans, the plot boundaries have been drawn to the Land Registry boundaries, or where it is available and differs from those boundaries, topographical survey data. The accuracy of these information sources differs from OS Base Mapping, which results in the plot boundaries and/or the Order limits not aligning with the line work shown on the OS Base Mapping.</p> <p>The description of the plots in the Book of Reference [APP-023] make clear that no properties are proposed to be subject to the land powers in the DCO.</p> <p>Mrs Miller is identified as holding an interest in highway land. Mrs Miller's interest in this land is listed as the title to this land is unregistered, and as a highway, it is therefore <i>presumed</i> (which is a rebuttable presumption) that Mrs Miller hold an interest in the land underneath the highway under the 'ad medium filum' rule.</p>

				<p>It is this subsoil which is sought to be subject to the compulsory acquisition of rights for the cable corridor.</p> <p>The impacts to Mrs Miller are therefore minimal, however, the Applicant is willing to discuss them with Mrs Miller.</p>
Land and Property	Compulsory Acquisition	Worried about the Compulsory Acquisition Rights over my property.	RR-0117	<p>The Applicant does not propose to compulsory acquire any garden land. Whilst the Land Plans [APP-005] appear to show land take within properties, this is not the case. As explained in Note 2 to the Land Plans, the plot boundaries have been drawn to the Land Registry boundaries, or where it is available and differs from those boundaries, topographical survey data. The accuracy of these information sources differs from OS Base Mapping, which results in the plot boundaries and/or the Order limits not aligning with the line work shown on the OS Base Mapping.</p> <p>The description of the plots in the Book of Reference [APP-023] make clear that no properties are proposed to be subject to the land powers in the DCO.</p> <p>Mr Faulkner is identified as holding an interest in highway land. Mr Faulkner's interest in this plot is listed as the title to this land is unregistered, and as a highway, it is therefore <i>presumed</i> (which is a rebuttable presumption) that Mr Faulkner hold an interest in the land underneath the highway under the 'ad medium filum' rule. It is this subsoil which is sought to</p>

				<p>be subject to the compulsory acquisition of rights for the cable corridor.</p> <p>The impacts to Mr Faulkner are therefore minimal, however the Applicant is willing to discuss them with the Parish Council. Noted.</p>
Land and Property	Compulsory Acquisitions.	At no previous consultations have the developers mentioned compulsory acquisitions to residents.	RR-0333	<p>During statutory consultation in May 2022, it was made clear that the DCO Application would include compulsory acquisition powers. This was made clear within the Section 48 notice which states at paragraph 4:</p> <p><i>“The proposed DCO will, among other things, authorise... the permanent and/or temporary acquisition of land and/or rights and overriding of easements and other rights over or affecting land”.</i></p> <p>Section 42 notices were sent in June 2022 to all affected residents notifying them of the Proposed Development.</p> <p>The <b>Schedule of Negotiations and Powers Sought [APP-024]</b> provides details of the negotiations entered into with landowners prior to submission of the Application. Since the submission of the Application, the Applicant has continued efforts to meet with landowners and continue discussions.</p>

				<p>Mrs Beamish is identified as holding an interest in highway land. Mrs Beamish's interest in this land is listed as the title to this land is unregistered, and as a highway, it is therefore <i>presumed</i> (which is a rebuttable presumption) that Mrs Beamish hold an interest in the land underneath the highway under the 'ad medium filum' rule. It is this subsoil which is sought to be subject to the compulsory acquisition of rights for the cable corridor.</p> <p>The impacts to Mrs Beamish in this regard are therefore minimal, however the Applicant is willing to discuss them with Mr Beamish.</p>
Land and Property	Compulsory Acquisition	The scheme cannot be built without temporary compulsory acquisition powers yet the extent and detail of these were not clear in the Statutory Consultation. As residents, who would be directly affected by these powers, should they be granted, it raise very significant concerns.	RR-0408	<p>Mrs Woolley is identified as holding an interest in highway land. Mrs Wooley's interest in this land is listed as the title to this land is unregistered, and as a highway, it is therefore <i>presumed</i> (which is a rebuttable presumption) that Mrs Wooley hold an interest in the land underneath the highway under the 'ad medium filum' rule. The area of highway land is proposed to be subject to temporary possession powers to enable the Applicant to undertake highways improvements to facilitate access to land to the west of the highway and are therefore unlikely to affect the subsoil and in any event, have a minimal impact on Mrs Wooley's property interests.</p>
Land and Property	Compulsory Acquisition	Concern about the compulsory acquisition of residential property.	<u>RR-0524</u>	<p>Mr Saunders is identified as holding an interest in highway land. Mr Saunders's interest in this</p>

				<p>land is listed as the title to this land is unregistered, and as a highway, it is therefore <i>presumed</i> (which is a rebuttable presumption) that Mr Saunders hold an interest in the land underneath the highway under the ‘ad medium filum’ rule. It is this subsoil which is sought to be subject to the compulsory acquisition of rights for the cable corridor.</p> <p>The impacts to Mr Saunders are therefore minimal, however the Applicant is willing to discuss them with Mr Saunders.</p>
Land and Property	Compulsory Acquisition	Compulsory acquirement of my land which I previously knew nothing about.	<u>RR-0567</u>	<p>The Applicant does not propose to compulsory acquire any garden land. The description of the plots in the Book of Reference [APP-023] make clear that no properties are proposed to be subject to the land powers in the DCO.</p> <p>Mrs Beecham is identified as holding an interest in highway land. Mrs Beecham’s interest in this land is listed as the title to this land is unregistered, and as a highway, it is therefore presumed (which is a rebuttable presumption) that Mrs Beecham hold an interest in the land underneath the highway under the ‘ad medium filum’ rule. It is this subsoil which is sought to be subject to the compulsory acquisition of rights for the cable corridor.</p> <p>The impacts to Mrs Beecham are therefore minimal, however the Applicant is willing to discuss them with Mrs Beecham.</p>



<p>Land and Property</p>	<p>Compulsory Acquisition &amp; Access</p>	<p>The likely compulsory acquisitions rights will impinge on our rights over our own land.</p>	<p>RR-0645</p>	<p>Further to this representation, the Applicant acknowledges that Mrs Peverell’s interest in plot 02-130 is made up of two elements:</p> <p>Firstly, having considered in detail the title position, it is recognised that Mrs Peverell holds a right to access and maintain the grass area forming part of plot 02-130 and this interest will be represented in the next iteration of the Book of Reference as a Category 2 interest. This interest will be appear in the Book of Reference alongside the existing Category 1 subsoil interest mentioned below. The Applicant notes that the grass area in question is located outside of the front wall of Mrs Peverell’s property, and adjacent to the pavement and therefore has the appearance of a highway verge.</p> <p>Secondly, Mrs Peverell is identified as holding an interest in the highway land adjacent to her property. This interest is listed as the title to this land is unregistered, and as a highway, it is therefore presumed (which is a rebuttable presumption) that Mrs Peverell hold an interest in the land underneath the highway under the ‘ad medium filum’ rule.</p> <p>The Applicant’s compulsory acquisition of rights proposals relate to cabling to be installed in the subsoil of the highway land and potentially of the grass area. In both instances, it is</p>
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				<p>considered the impacts to Mrs Peverell are limited, and do not impact upon the residential use of her property as a whole.</p> <p>If the grass area noted above is impacted whilst the cables are being laid, it will be reinstated to a suitable condition once the works have been completed, which is a requirement of the temporary possession power of the DCO, which would likely be utilised prior to the full compulsory acquisition of rights powers. The details of these cabling works will be outlined within the final CEMP and CTMP, with suitable notice given to all affected parties prior to the commencement of any works.</p>
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## Supply Chain

Topic	Theme	Summary of points raised	RR reference	MPSF's Response
Supply Chain	Sourcing of materials	<p>Concerns about the sourcing of materials for the panels from China.</p> <p>Increased concern about the mention of these panels being made within a forced labour manner.</p>	RR-0672, RR-1145, RR-0173, RR-0309, RR-0699, RR-0158, RR-0590, RR-1090, RR-0230, RR-0441, RR-0692, RR-0845, RR-0848, RR-0982, RR-1088, RR-0109, RR-1075, RR-0647, RR-0584, RR-0992, RR-0160, RR-0318, RR-0366, RR-1128, RR-1166, RR-0654, RR-0280, RR-0680, RR-0026, RR-0668, RR-0674, RR-0685, RR-0727, RR-0761, RR-0965, RR-1210, RR-0304, RR-0865, RR-1162, RR-1192, RR-0071, RR-0103, RR-0122, RR-0124, RR-0143, RR-0144, RR-0191, RR-0435, RR-0803, RR-0213, RR-0883, RR-0371, RR-1070, RR-0768, RR-0092, RR-1149, RR-1049, RR-1038, RR-0929, RR-0923, RR-0867, RR-0809,	<p>The Applicant recognises that communities and stakeholders want clear commitments that the technology used for the Proposed Development will be free from forced labour; this is why the Applicant has produced a clear Outline Employment, Skills and Supply Chain Plan (OESSCEP) - that includes clear commitments on ethical procurement. As detailed in the OESSCEP, [APP-211], the Applicant wishes to ensure the construction, operation, and decommissioning of the Proposed Development is undertaken pursuant to an ethical procurement policy and that this is a legal obligation on anyone who has the powers under the DCO. The OESSCEP is a certified document in the draft DCO [APP-017].</p> <p>The Applicant strongly condemns and opposes the use of forced labour in any context in the strongest possible terms. The Applicant fully supports the steps being taken by the UK government and solar industry to ensure the highest possible levels of transparency and to rid human rights abuses from the global supply chain for UK solar developments.</p> <p>In addition to this, the Applicant has published clear statements on this topic, which condemn the illegal practice of modern slavery or forced labour of any kind.</p> <p>These statements can be found using the following URLs:</p> <ul style="list-style-type: none"> <li>• Canadian Solar:             <ul style="list-style-type: none"> <li>[REDACTED]</li> <li>[REDACTED]</li> <li>[REDACTED]</li> </ul> </li> <li>• Windel Energy: [REDACTED]</li> </ul>

			RR-0799, RR-0607, RR-0570, RR-0553, RR-0546, RR-0509, , RR-0436, RR-0102, RR-0020, RR-1181, RR-1089, RR-1053, RR-0944, RR-0712, RR-0646, RR-0565, RR-0422, RR-0400, RR-0355, RR-0325, RR-0215, RR-0169, RR-0088, RR-0084, RR-0035, RR-0027, RR-1091, RR-1003, RR-0938, RR-0913, RR-0907, RR-0832, RR-0817, RR-0759, RR-0612, RR-0596, RR-0391, RR-0357, RR-0258, RR-0252, RR-0159, RR-1137,  RR-0043, RR-0134, RR-0759, RR- 0397, RR-0454 RR-0771, RR-0834, RR-0932, RR-1149	The Applicant has signed the Solar Energy UK Industry Supply Chain Statement, a UK-based industry-wide condemnation of all human rights abuses, including forced labour in the global supply chain. The UK Industry Supply Chain Statement can be found using the follow URL:  
Supply Chain	Applicant	Concern about the integrity of Windel Energy and Canadian Solar for a Proposed	RR-0309, RR-0230, RR-0982, RR-1072, RR-1088, RR-1075, RR-0834, RR-1166, RR-0680, RR-0727, RR-1162, RR-0103,	The Applicant is seeking consent for the Proposed Scheme. Any other scheme would need to go into the relevant planning regime and would be considered by the decision-maker on its own merits and disbenefits.  The Applicant is well placed to build the Proposed Development as set out in the Funding Statement [APP-022].

		<p>Development of this scale.</p>	<p>RR-0143, RR-0669, RR-0737, RR-0050, RR-0803, RR-0675, RR-1193, RR-1048, RR-0482, RR-0932, RR-0140, RR-1175, RR-0048, RR-0043, RR-0034, RR-1181, RR-1157, RR-1139, RR-1121, RR-1053, RR-0734, RR-0422, RR-0215, RR-0193, RR-0145, RR-0084, RR-1003, RR-0913, RR-0907, RR-0877, RR-0779, RR-0612, RR-0596, RR-0252, RR-0127, RR-0095, RR-1029, RR-0771, RR-0932</p>	<p>The Applicant notes the provisions of article 44 of the draft DCO in this regard, which provides that no land powers can be utilised without the Secretary of State first approving a form of guarantee or other security for compensation costs. Funding will be available for the project, as set out in the Funding Statement [APP-022]</p> <p>It is also noted that breach of a DCO is a criminal offence, and with the various mitigation measures secured in the DCO, the responsible building of the Proposed Development can be assured</p>
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Site Selection, Need for the Development and Alternatives

Topic	Theme	Summary of points raised	RR reference	MPSF's Response
Statement of Need	Site Selection	Concerns about the Proposed Development being placed on greenfield. The location should have been given some further consideration and placed onto brownfield and not be influenced by the location of the substation.	RR-0543, RR-0512, RR-0744, RR-0845, RR-1042, RR-0140, RR-0711, RR-0373, RR-0740, RR-0077, RR-0688, RR-1055, RR-0532, RR-0122, RR-1159, RR-0678, RR-0297, RR-0675, RR-1112, RR-0250, RR-0462, RR-1048, RR-0372, RR-0873, RR-1124, RR-1038, RR-0831, RR-0809, RR-0240, RR-0219, RR-1157, RR-1093, RR-0829, RR-1137, RR-1071, RR-0172, RR-0837, RR-0195, RR-1022, RR-0389, RR-0464, RR-0994, RR-0306, RR-0386, RR-0844, RR-1008, RR-0995, RR-0980, RR-0880, RR-0867, RR-0854, RR-0831, RR-0621, RR-0465, RR-0457, RR-0452, RR-0448, RR-0436, RR-0425, RR-0423, RR-0403, RR-0253, RR-0235, RR-0202, RR-0182, RR-0178, RR-0151, RR-0083, RR-0073, RR-0048, RR-1194, RR-1186, RR-1157, RR-1151, RR-1146, RR-1139, RR-1133, RR-	<p><b>Section 3.3 of the Statement of Need [APP-202]</b> describes Government's view that large capacities of low-carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar".</p> <p><b>Section 7.6 of the Statement of Need</b> analyses the potential contribution of "brownfield" solar sites to the national need for solar generation. Brownfield sites, including rooftop and other community energy systems, are likely to grow in the UK and will make a contribution to decarbonisation of the UK energy system.</p> <p>However, the <b>Statement of Need</b> concludes that on their own, brownfield developments are unlikely to be able to meet the national need for solar. <b>Section 8.5 of the Statement of Need</b> describes and agrees with Government's view that decentralised and community energy systems are unlikely to lead to the significant replacement of large-scale infrastructure. It is the Applicant's view (and this aligns with Government's view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p>

			<p>1119, RR-1110, RR-1093, RR-1089, RR-1063, RR-1053, RR-1036, RR-0968, RR-0960, RR-0949, RR-0944, RR-0943, RR-0925, RR-0896, RR-0868, RR-0851, RR-0829, RR-0785, RR-0712, RR-0662, RR-0646, RR-0628, RR-0483, RR-0466, RR-0400, RR-0325, RR-0300, RR-0228, RR-0220, RR-0207, RR-0201, RR-0198, RR-0175, RR-0064, RR-0060, RR-0038, RR-0035, RR-0027, RR-1207, RR-1190, RR-1091, RR-1006, RR-1003, RR-0988, RR-0977, RR-0970, RR-0853, RR-0833, RR-0825, RR-0787, RR-0779, RR-0759, RR-0743, RR-0728, RR-0611, RR-0535, RR-0534, RR-0516, RR-0515, RR-0499, RR-0489, RR-0444, RR-0427, RR-0357, RR-0310, RR-0287, RR-0268, RR-0258, RR-0246, RR-0168, RR-0159, RR-0107, RR-0042, RR-0013, RR-1216, RR-1137, RR-1114, RR-1094, RR-1071, RR-1069, RR-1052, RR-0975, RR-0946, RR-0866, RR-0847, RR-</p>	<p><b>Section 7.5</b> of the <b>Statement of Need</b> describes the site selection process for large scale solar developments in the UK. In particular, <b>Paragraph 7.5.6</b> describes that suitable sites for solar developments “require three fundamental attributes” – being the availability of sufficient land; availability and capacity for grid connection; and acceptable irradiation yields. <b>Figure 7.4</b> and <b>Sections 9.2 and 9.4</b> of the <b>Statement of Need</b> describe the suitability of the local area for large scale solar infrastructure projects.</p> <p>The Site Selection Assessment [<b>APP-205</b>] goes on to discuss how the site was chosen in light of that need.</p>
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			0800, RR-0766, RR-0746, RR-0724, RR-0667, RR-0643, RR-0586, RR-0569, RR-0562, RR-0560, RR-0531, RR-0525, RR-0519, RR-0474, RR-0365, RR-0362, RR-0361, RR-0359, RR-0281, RR-0261, RR-0255, RR-0212, RR-0188, RR-0172, RR-0153, RR-1213, RR-1172, RR-1153, RR-1129, RR-1105, RR-1073, RR-1031, RR-0955, RR-0917, RR-0914, RR-0742, RR-0615, RR-0603, RR-0602, RR-0484, RR-0395, RR-0380, RR-0358, RR-0342, RR-0311, RR-0218, RR-0206, RR-0196, RR-0184, RR-0154, RR-0108, RR-1219, RR-1205, RR-1022, RR-0991, RR-0859, RR-0814, RR-0670, RR-0637, RR-0460, RR-0445, RR-0389, RR-0231, RR-0058, RR-0984, RR-0874, RR-0598, RR-0526, RR-0477, RR-0464, RR-0413, RR-0399, RR-0319, RR-0276, RR-0186, RR-0049, RR-1126, RR-1067, RR-0994, RR-0958, RR-0889, RR-0437, RR-0433, RR-0306, RR-0298, RR-	
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			<p>0260, RR-0177, RR-0072, RR-0068, RR-0014, RR-0004, RR-0736, RR-0564, RR-0561, RR-0408, RR-0289, RR-1202, RR-0563, RR-0469, RR-0972, RR-0568, RR-0385, RR-0012, RR-1180, RR-0791, RR-1056, RR-0714, RR-0811, RR-0771, RR-0386, RR-0356, RR-1014, RR-0875, RR-0844, RR-0725, RR-0633, RR-0592, RR-0537, RR-0490, RR-0383, RR-0244, RR-0221, RR-0093, RR-0051, RR-0981, RR-0872</p> <p>RR-0397, RR-0432, RR-0454, RR-0469, RR-0771, RR-1152,</p>	
Statement of Need	Site Selection	Further consideration should have been given about using multiple smaller parcels of land, that are spread out, rather than one large area for the Proposed Development.	<p>RR-0347, RR-0222, RR-1192, RR-0829</p> <p>RR-0137, RR-0408, RR-0771, RR-1091, RR-1152</p>	<p><b>Section 7.5</b> of the <b>Statement of Need [APP-202]</b> describes the site selection process for large scale solar developments in the UK. In particular, <b>Paragraph 7.5.6</b> describes that, consistent with Government’s view (which is described in <b>Paragraphs 3.3.17-18</b>), suitable sites for solar developments “require three fundamental attributes” – being the availability of sufficient land; availability and capacity for grid connection; and acceptable irradiation yields. <b>Figure 7.4</b> and <b>Sections 9.2 and 9.4</b> of the</p>



				<p><b>Statement of Need</b> describe the suitability of the local area for large scale solar infrastructure projects. <b>Section 8.7</b> describes the concept of local specificity, which suggests that provided suitable land parcels can be identified and secured for large scale solar in the local area, then the local area is highly suitable for large-scale solar development and therefore is likely to attract large-scale solar projects to the area and that these projects will be essential for the decarbonisation of the UK electricity sector.</p> <p>A Site Selection Assessment is appended to the <b>Planning Statement [APP-203]</b> which provides an overview of the site selection process undertaken by the Applicant to identify the location of the Proposed Development.</p> <p>Ultimately, <b>Section 7.7</b> of the <b>Statement of Need</b> sets out how the design of the Proposed Development seeks to maximise utilisation of the grid connection capacity available at Ryhall Substation while balancing the impact of the Proposed Development to the local area. It is noted that if multiple smaller parcels were shown, this would a greater number of receptors affected as well as additional landholdings affected by the need for more cable corridors.</p>
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				<p>Further analysis of the evolution of the design of the Proposed Development can be found in the <b>Environmental Statement Chapter 4: Alternatives and Design Development [APP-034]</b> and the <b>Design and Access Statement [APP-204]</b>.</p> <p><b>Section 8</b> of the <b>Planning Statement [APP-203]</b> concludes with a consideration of the Planning Balance and justifies how the overwhelming national need, as demonstrated in the <b>Statement of Need</b> outweighs any potential significant adverse impacts of the Proposed Development which, as the <b>Environmental Statement</b> sets out, are limited.</p>
Statement of Need	Need for Development	Clarification requested on the need for this development within the area.	RR-0511, RR-0909, RR-0221, RR-0043, RR-0194, RR-0771, RR-0982,	<p><b>Section 7.5</b> of the <b>Statement of Need [APP-202]</b> describes the site selection process for large scale solar developments in the UK. In particular, <b>Paragraph 7.5.6</b> describes those suitable sites for solar developments “require three fundamental attributes” – being the availability of sufficient land; availability and capacity for grid connection; and acceptable irradiation yields. <b>Figure 7.4</b> and <b>Sections 9.2 and 9.4</b> of the <b>Statement of Need</b> describe the suitability of the local area for large scale solar infrastructure projects. <b>Section 8.7</b> describes the concept of local specificity, which suggests that provided suitable land parcels can be identified and secured for large scale solar in the local area, then the local area is highly suitable for large-scale solar development and therefore is likely to attract large-scale solar projects to the area</p>

				<p>and that these projects will be essential for the decarbonisation of the UK electricity sector.</p> <p>A Site Selection Assessment is appended to the <b>Planning Statement [APP-203]</b> which provides an overview of the site selection process undertaken by the Applicant to identify the location of the Proposed Development, and further analysis on the evolution of the design of the Proposed Development can be found in the <b>Environmental Statement Chapter 4: Alternatives and Design Development [APP-034]</b>.</p> <p><b>Section 8</b> of the <b>Planning Statement [APP-203]</b> concludes with a consideration of the Planning Balance and justifies how the overwhelming national need, as demonstrated in the <b>Statement of Need</b> outweighs any potential significant adverse impacts which, as the <b>Environmental Statement</b> sets out, are limited</p>
Statement of Need	Alternative sources of energy	Further consideration into using alternative energy sources at the Site instead of solar, due to the research demonstrating the inefficiency of solar panels.	RR-1113, RR-0227, RR-0290, RR-0336, RR-1077-, RR-0605, RR-0160, RR-1166, RR-0075, RR-1217, RR-0668, RR-1028, RR-1195, RR-0609, RR-0071, RR-0122, RR-0143, RR-0050, RR-0250, RR-0090, RR-0140, RR-1165, RR-1149, RR-1038, RR-0929, RR-0923, RR-0867, RR-0830, RR-0809, RR-0783,	<p><b>Section 3.3</b> of the <b>Statement of Need [APP-202]</b> describes Government’s view that large capacities of low-carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that “a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar”, so the % contribution of solar will continue to grow. This philosophy of support for large scale solar as part of the ‘answer’ to net zero has been repeated in its recent policy documents</p>

			<p>RR-0778, RR-0448, RR-0332, RR-0294, RR-0241, RR-0240, RR-0182, RR-1102, RR-0944, RR-0644, RR-0256, RR-0938, RR-0515, RR-0341, RR-0069, RR-0800, RR-0528, RR-0525, RR-0361, RR-0170, RR-1129, RR-0837, RR-0615, RR-0342, RR-0196, RR-0085, RR-0966, RR-0637, RR-0623, RR-0549, RR-0081, RR-0033, RR-0935, RR-0805, RR-0308, RR-0958, RR-0889, RR-0385, RR-0741, RR-1056, RR-1037, RR-0771, RR-0550, RR-0592, RR-0383, RR-0163, RR-0051, RR-0493, RR-0831, RR-0809, RR-0790, RR-0756, RR-0625, RR-0621, RR-0465,</p> <p>RR-0043, RR-0182, RR-0183, RR-0194, RR-0397, RR-0454, RR-0771, RR-0982, RR-1126</p>	<p>published in March 2023. Government policy is clear that solar and wind is required in order to meet the Net Zero challenge.</p> <p><b>Figure 10.4</b> of the <b>Statement of Need</b> shows that on a levelized cost of energy basis, large scale solar is already cheaper than offshore wind, and Government’s projections are that it will remain cheaper in the future.</p> <p>The cost of solar generation is an important enabler of its development. Solar panels and electrical infrastructure have become larger and more efficient. <b>Figure 10.2</b> of the <b>Statement of Need</b> shows that many solar cell cells are over 20% efficient and some are within reach of 30% efficiency, meaning that more low-carbon electricity can be generated from the same area of land as was previously possible.</p> <p><b>Table 7.1</b> of the <b>Statement of Need</b> shows the electricity generated per Ha by different low-carbon technologies. At the UK’s average solar load factor (11%), solar generation produces much more energy per Ha than biogas, and generates a similar amount of energy as onshore wind.</p> <p>Solar is now a leading low-cost generation technology and <b>Figure 10.4</b> of the <b>Statement of Need</b> shows that on a levelized cost of energy basis, large scale solar is already cheaper than offshore wind, and Government’s projections are that it will remain cheaper in the future. In</p>
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				<p>2021, GB sourced 42% of its electricity from renewables, of which approximately 9.4% was from solar.</p> <p><b>Paragraph 7.6.9</b> of the <b>Statement of Need [APP-202]</b> describes Government’s anticipated range of 2 to 4 acres for each MW of output generally required for a solar farm along with its associated infrastructure. The Proposed Development as proposed delivers a large-scale solar generation asset which is consistent with this range</p> <p>A Site Selection Assessment is appended to the <b>Planning Statement [APP-203]</b> which provides an overview of the site selection process undertaken by the Applicant to identify the location of the Proposed Development, and further analysis on the evolution of the design of the Proposed Development (including consideration of alternative technologies) can be found in the <b>Environmental Statement Chapter 4: Alternatives and Design Development [APP-034]</b>.</p> <p><b>Section 8</b> of the <b>Planning Statement [APP-203]</b> concludes with a consideration of the Planning Balance and justifies how the overwhelming national need, as demonstrated in the <b>Statement of Need</b> outweighs any potential significant adverse impacts which, as the <b>Environmental Statement</b> sets out, are limited.</p>
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Statement of Need	Alternative Locations	<p>Further consideration into the proposed placement of the solar panels.</p> <p>Confirmation as to reasonings behind not utilising roofs, warehouses etc. rather than required agricultural land.</p>	<p>RR-0904, RR-0082, RR-0189, RR-0290, RR-0005, RR-0370, RR-0421, RR-0672, RR-0860, RR-0900, RR, RR--1130, RR-0171, RR-0639, RR-0597, RR-0748, RR-0039, RR-0054, RR-0441, RR-0481, RR-0512, RR-0663, RR-0723, RR-0744, RR-0892, RR-1088, RR-1099, RR-1147, RR-1142, RR-0074, RR-1077, RR-0140, RR-0326, RR-0835, RR-0890, RR-0373, RR-0641, RR-0160, RR-0487, RR-0740, RR-0077, RR-0578, RR-0793, RR-0318, RR-0538, RR-0559, RR-0595, RR-1166, RR-1198, RR-0600, RR-0047, RR-0327, RR-0328, RR-0998, RR-1011, RR-1217, RR-0001, RR-0026, RR-0105, RR-0324, RR-0758, RR-0936, RR-1055, RR-0416, RR-0813, RR-0863, RR-0532, RR-0097, RR-0143, RR-0144, RR-0420, RR-0679, RR-0894, RR-0803, RR-1208, RR-0213, RR-0599, RR-1066, RR-1209, RR-0372, RR-1165, RR-1167, RR-1038, RR-0999, RR-0995, RR-</p>	<p><b>Section 3.3</b> of the <b>Statement of Need [APP-202]</b> describes Government’s view that large capacities of low-carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that “a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar”.</p> <p><b>Section 7.6</b> of the <b>Statement of Need</b> analyses the potential contribution of “brownfield” solar sites to the national need for solar generation. Brownfield sites, including rooftop and other community energy systems, are likely to grow in the UK and will make a contribution to decarbonisation of the UK energy system. However, the <b>Statement of Need</b> concludes that on their own, brownfield developments are unlikely to be able to meet the national need for solar. <b>Section 8.5</b> of the <b>Statement of Need</b> describes and agrees with Government’s view that decentralised and community energy systems are unlikely to lead to the significant replacement of large-scale infrastructure. It is the Applicant’s view (and this aligns with Government’s view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p> <p><b>Section 7.5</b> of the <b>Statement of Need</b> describes the site selection process for large scale solar developments in the UK. In particular, <b>Paragraph 7.5.6</b> describes that suitable sites for solar developments “require three fundamental attributes” – being the availability of sufficient</p>
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			<p>0974, RR-0929, RR-0923, RR-0831, RR-0625, , RR-0397, RR-1157, RR-0949, RR-0300, RR-0220, RR-0515, RR-1216, RR-1137, RR-0946, RR-0861, RR-0586, RR-0361, RR-0299, RR-0281, RR-0172, RR-0615, RR-0195, RR-1022, RR-0389, RR-0081, RR-0805, RR-0464, RR-0306, RR-0811, RR-0386, RR-0980, RR-0937, RR-0929, RR-0885,</p> <p>RR-0137, RR-0194, RR-0408, RR-0432, RR-0454, RR-0397, RR-0771, RR-0979, RR-1091, RR-1100, RR-1152</p>	<p>land; availability and capacity for grid connection; and acceptable irradiation yields. <b>Figure 7.4</b> and <b>Sections 9.2 and 9.4</b> of the <b>Statement of Need</b> describe the suitability of the local area for large scale solar infrastructure projects.</p> <p>The Design and Access Statement [APP-204] goes on to describe how the Scheme design has developed in the context of local considerations.</p>
Statement of Need	Size of Development vs. Need	Further clarification requested on the size of development compared to the need of the proposed Development.	<p>RR-0230, RR-1001, RR-0023, RR-1028, RR-0191, RR-0984, RR-0101, RR-0470, RR-1048, RR-1070</p> <p>RR-0333, RR-0397, RR-0454, RR-0771, RR-0925</p>	<p><b>Section 3.3</b> of the <b>Statement of Need [APP-202]</b> describes Government’s view that large capacities of low-carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that “a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar”.</p> <p><b>Section 8.5</b> of the <b>Statement of Need</b> describes and agrees with Government’s view that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p>

				<p><b>Paragraphs 3.3.17-18 of the Statement of Need [APP-202]</b> explains Government’s view that irradiance, site topography and proximity to suitable connection points to the transmission network, are likely to be key inputs to site selection. <b>Section 7.5</b> of the <b>Statement of Need</b> describes the site selection process for large-scale solar more fully, and <b>Section 7.7</b> of the <b>Statement of Need</b> sets out how the design of the Proposed Development seeks to maximise utilisation of the existing and available 240MW grid connection capacity available at Ryhall Substation.</p> <p><b>Paragraph 7.6.9 of the Statement of Need [APP-202]</b> describes Government’s anticipated range of 2 to 4 acres for each MW of output generally required for a solar farm along with its associated infrastructure. The Proposed Development as proposed delivers a large-scale solar generation asset which is consistent with this range</p>
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## General Topics

Topic	Theme	Summary of points raised	RR reference	MPSF's Response
General	Opposing	Oppose the Proposed Development.	RR-0433, RR-0617, RR-0873, RR-0529, RR-1085, RR-0720, RR-1120, RR-1051, RR-0660, RR-1196, RR-0801.	Noted.
General	Battery Storage	Further clarification on battery storage as part of the Proposed Development.	RR-0723, RR-0405 RR-0120, RR-0669, RR-0996, RR-0213, RR-0883, RR-0371, RR-0284, RR-0860, RR-1154, RR-0846, RR-0309, RR-0590, RR-1090, RR-0121, RR-0318, RR-0316, RR-1167, RR-0867, RR-1181, RR-0098, RR-0612,  RR-0134, RR-0194, RR-0333, RR-0782,	The draft Development Consent Order [APP-017] does not allow for the construction of batteries. The Applicant does not have any current plans that battery storage would be brought forward, given the export connection offer, but in any event, any future battery proposal would require separate consent.
General	Consultation	Concerns about the consultation process undertaken as part of the Proposed Development. The consultation process could have been improved.	RR-0924, RR-0731, RR-0752, RR-1149, RR-0043, RR-0064, RR-0333	The Applicant conducted a thorough consultation on the Proposed Development across multiple phases of consultation, consistent with relevant legislation and compliance with the Planning Act 2008. This is described and evidenced in the Applicant's Consultation Report [APP-025] which was reviewed and accepted by the Planning Inspectorate (PINS) on 21 December 2022.  Appendix 4 and 5 to the Consultation Report [APP-026] [APP-027] includes a thorough

				<p>record of comments submitted through consultation and how these comments have been considered and responded to by the Applicant.</p> <p>The Applicant is confident it acted professionally at all times throughout the public consultation process and has always been committed to open and transparent public consultation that sought the views of the community extensively to inform the final design of the project. This is described and evidenced in the Applicant's Consultation Report [APP-025] which was reviewed and accepted by the Planning Inspectorate (PINS) on 21 December 2022.</p> <p>In addition to this, during statutory consultation in May 2022, it was made clear that the DCO Application would include compulsory acquisition powers. This was made clear within the Section 48 notice which states at paragraph 4:</p> <p>"The proposed DCO will, among other things, authorise... the permanent and/or temporary acquisition of land and/or rights and overriding of easements and other rights over or affecting land".</p> <p>The Section 42 notice was also sent on 17 June 2022.</p>
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General	Security	Further clarification requested regarding the policing and security of the Proposed Development.	RR-0050, RR-0566, RR-0333, RR-0771	<p>Site security is provided in <b>Section 2.11</b> of the <b>Outline Construction Environmental Management Plan (oCEMP) [APP-207]</b> and <b>Section 2.8</b> of the <b>Outline Decommissioning Environmental Management Plan (oDEMP) [APP-209]</b>. The construction and decommissioning phases will be managed by the appointed principal construction contractor. Perimeter fencing will be implemented in accordance with details approved by the relevant planning authority, at the start of the construction and decommissioning phases. Storage of materials and chemicals will be kept secure to prevent theft or vandalism. The principal construction contractor will be responsible for establishing a safe system for accessing the material storage areas.</p> <p>The outline Operational Environmental Management Plan <b>[APP-208]</b> sets out the security arrangements for the operational phase of the Proposed Development. Passive Infra-red Detector (PID) systems (or similar) will be installed around the perimeter of the PV Arrays to provide night vision functionality for the CCTV.</p>
General	Cumulative Impacts	Concern around the ability to mitigate the cumulative impacts of the Proposed Development.	RR-0408	Chapter 16 of the Environmental Statement <b>[APP-046]</b> provides an assessment of the cumulative effects of the proposed development and notes that impacts will be able to be mitigated. The Planning Inspectorate Advice Note 17: Cumulative Effects Assessment (December 2015) has formed the basis of

				assessing cumulative effects between the Proposed Development and other developments. The long list of other development developments considered is set out within Appendix 2.5 of the ES <b>[APP-052]</b> .
General	DCO Process	Further information required surrounding the DCO Process and how the Planning Inspector will view the Proposed Development.	RR-1164, RR-0884.	Noted.
General	Biodiversity Net Gain	10% biodiversity net gain the project	RR-0771	<p>Relatively little productive land within the Application Site is set aside for Biodiversity Net Gain and the majority is provided through making the most of land remaining on the edge of field boundaries and enhancing opportunities for wildlife to thrive in hedgerows and on the river corridor, for instance.</p> <p>The larger areas which are identified for mitigation are fields that would remain in agricultural use, but within which skylark plots would be provided. This does not disrupt the use of the land for productive farming.</p> <p>Whilst 10% BNG is not yet a legal requirement for Nationally Significant Infrastructure Projects, the Government has been clear on</p>

				<p>the direction of policy on BNG including in The Environmental Improvement Plan (EIP), published in January 2023 and in the March 2023 Powering Up Britain policy documentation release.</p> <p>It is noted that the Proposed Development results in a net gain for both habitats (72.19%) and hedgerow (40.83%). Any future regulations that would apply to already consented schemes would apply to the Proposed Development – the siting makes no difference to this.</p> <p>The approach taken to BNG for Mallard Pass Solar Farm is entirely consistent with these policy aims.</p>
General	Safety	Concern around the safety for residents who reside and utilise the wider area around the Proposed Development. 3333	RR-1049, RR-0923, RR-0570, RR-0509, RR-1181, RR-0333, RR-0088, RR-0877, RR-0759, RR-0596, RR-0515, RR-0468, RR-0258, RR-0252, RR-1178, RR-1137	<p>Safety relating to electromagnetic fields has been considered within the Major Accidents and/or Disasters section of the Other Environmental Topics chapter of the ES <b>[APP-045]</b>. The Grid Connection Cable will be buried underground at a suitable depth and the Onsite Substation will be set back from Uffington Lane and designed in accordance with relevant guidance (DECC Power Lines: Demonstrating compliance with EMF public exposure guidelines, A Voluntary Code of Practice 2012). Therefore,</p>

				<p>electromagnetic fields are unlikely to have any adverse effects on residential receptors. In terms of security, a fence will enclose the PV Arrays and will be up to 2m in height. Pole mounted internal facing closed circuit television (CCTV) systems will be installed at a height of up to 3.5m around the perimeter of the PV Arrays. CCTV cameras would use night-vision technology, which would be monitored remotely.</p> <p>The safety of residents relating to construction traffic will be managed by the outline Construction Environmental Management Plan <b>[APP-207]</b> and outline Construction Traffic Management Plan <b>[APP-212]</b>. Chapter 9: Highways and Access <b>[APP-039]</b> of the ES concludes that the construction phase of the Proposed Development would have a negligible and non-significant effect on Accidents and Safety.</p>
Environmental Statement	Site Designations	Our site is a top-tier COMAH site.	RR-0291, RR-1080, RR-1152	<p>COMAH sites have been considered within the Major Accidents and/or Disasters section of the Other Environmental Topics chapter of the ES <b>[APP-045]</b>. The CEMP and DEMP will provide details of the COMAH sites and the emergency response required in the event of an accident. This will involve stopping works, evacuating personnel from the affected area and consulting emergency services for advice.</p>

## Ecology and Biodiversity Impacts

Topic	Theme	Summary of points raised	RR reference	MPSF's Response
Ecology and Biodiversity	Wildlife impact	Concern that the Proposed Development will detrimentally impact the local wildlife.	RR-0245, RR-0284, RR-0314, RR-0510, RR-1035, RR-1113, RR-0384, RR-0594, RR-0052, RR-0484, RR-0543, RR-0638, RR-0860, RR-0394, RR-0756, RR-0879, RR-1061, RR-1136, RR-0334, RR-0387, RR-0653, RR-0390, RR-0471, RR-0590, RR-1090, RR-0017, RR-0039, RR-0054, RR-0208, RR-0223, RR-0230, RR-0266, RR-0692, RR-0804, RR-0892, RR-1001, RR-1057, RR-1088, RR-0061, RR-0109, RR-0152, RR-1042, RR-1142, RR-0630, RR-0784, RR-0373, RR-0518, RR-0740, RR-0318, RR-0572, RR-0973, RR-0654, RR-0786, RR-0816, RR-0075, RR-0718, RR-0280, RR-0327, RR-0680, RR-0998, RR-1156, RR-0001, RR-0215, RR-	<p>Chapter 7: Ecology and Biodiversity, of the ES [APP-037], presents the approach and findings of the assessment of potential impacts on Ecology and Biodiversity, including on protected and notable species such as otter, wintering and breeding birds.</p> <p>Perimeter fencing around the solar array will comprise of wooden posts and wire mesh fencing. Perimeter fences will not be constructed through existing hedgerows or across ditches. There will also be clearances above ground, or the inclusion of mammal gates to permit the movement of wildlife. Larger mammals such as deer will not be able to access the Solar PV Site, but connections to existing and enhanced habitats within the Order limits will provide suitable foraging and hiding resources, and allow access to wider habitat resource beyond the Order limits.</p> <p>The embedded mitigation measures include the details set out in the outline Construction and Environmental Management Plan (oCEMP) [APP-207], outline Decommissioning and Environmental Management Plan (oDEMP) [APP-209] and outline Landscape and Ecology Management Plan (oLEMP) [APP-210]. These documents have been prepared and include mitigation measures which are intended to</p>

			0685, RR-0863, RR-1150, RR-0120, RR-0143, RR-0459, RR-1159, RR-0679, RR-1041, RR-0050, RR-0971, RR-0664, RR-0883, RR-0340, RR-0942, RR-0371, RR-1010, RR-1048, RR-0090, RR-1197, RR-1223, RR-1221, RR-1132, RR-1038, RR-0974, RR-0923, RR-0886, RR-0867, RR-0854, RR-0818, RR-0806, RR-0799, RR-0764, RR-0762, RR-0690, RR-0677, RR-0666, RR-0621, RR-0593, RR-0588, RR-0570, RR-0546, RR-0541, RR-0486, RR-0436, RR-0425, RR-0397, RR-0332, RR-0301, RR-0151, RR-0102, RR-0059, RR-0057, RR-0048, RR-0045, RR-0043, RR-0021, RR-0020, RR-1157, RR-1151, RR-1139, RR-1133, RR-1123, RR-1089, RR-1053, RR-1040, RR-1033, RR-1002, RR-	avoid the risks of effects during the construction and decommissioning phases, such as indirect and direct damage to retained features, direct damage to active bird nests and injury to protected species or damage to the habitat of those species. The assessment of potential effects takes these measures into account and concludes that no likely significant adverse effects are expected to arise from the Proposed Development.
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			0968, RR-0960, RR-0956, RR-0944, RR-0683, RR-0646, RR-0644, RR-0579, RR-0565, RR-0497, RR-0483, RR-0450, RR-0422, RR-0402, RR-0363, RR-0355, RR-0354, RR-0312, RR-0300, RR-0256, RR-0220, RR-0215, RR-0198, RR-0193, RR-0175, RR-0169, RR-0145, RR-0098, RR-0088, RR-0084, RR-0064, RR-0038, RR-0035, RR-0027, RR-1206, RR-1173, RR-1170, RR-1127, RR-1095, RR-1091, RR-1006, RR-1003, RR-0977, RR-0970, RR-0913, RR-0907, RR-0891, RR-0877, RR-0817, RR-0832, RR-0779, RR-0728, RR-0612, RR-0611, RR-0596, RR-0589, RR-0516, RR-0515, RR-0499, RR-0418, RR-0392, RR-0357, RR-0341, RR-0288, RR-0287, RR-0258, RR-0252, RR-0226, RR-	
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			0161, RR-0159, RR-0127, RR-0095, RR-0069, RR-0042, RR-1216, RR-1212, RR-1178, RR-1117, RR-1114, RR-1104, RR-1071, RR-1027, RR-0946, RR-0887, RR-0878, RR-0842, RR-0800, RR-0703, RR-0661, RR-0573, RR-0519, RR-0495, RR-0359, RR-0281, RR-0212, RR-0188, RR-0153, RR-0029, RR-1222, RR-1213, RR-1184, RR-1172, RR-1172, RR-1158, RR-1044, RR-1031, RR-0976, RR-0881, RR-0742, RR-0702, RR-0659, RR-0636, RR-0615, RR-0602, RR-0552, RR-0484, RR-0395, RR-0393, RR-0380, RR-0358, RR-0315, RR-0311, RR-0272, RR-0206, RR-0196, RR-0184, RR-0166, RR-0164, RR-0085, RR-1205, RR-1138, RR-1043, RR-1022, RR-0997, RR-0991, RR-0389, RR-	
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			0231, RR-0150, RR-0067, RR-0033, RR-0009, RR-0008, RR-1171, RR-0984, RR-0874, RR-0805, RR-0794, RR-0781, RR-0780, RR-0648, RR-0598, RR-0506, RR-0504, RR-0464, RR-0399, RR-0396, RR-0308, RR-0276, RR-0237, RR-0225, RR-0167, RR-0028, RR-1125, RR-0994, RR-0732, RR-0632, RR-0437, RR-0433, RR-0426, RR-0409, RR-0401, RR-0378, RR-0322, RR-0307, RR-0305, RR-0293, RR-0265, RR-0260, RR-0177, RR-0106, RR-0072, RR-1068, RR-0910, RR-0736, RR-0408, RR-0348, RR-0209, RR-0505, RR-0194, RR-1144, RR-1021, RR-0271, RR-1180, RR-1050, RR-0741, RR-0030, RR-1037, RR-0714, RR-1116, RR-0811, RR-0771, RR-0550, RR-0356, RR-1058, RR-	
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			<p>1014, RR-0930, RR-0921, RR-0856, RR-0795, RR-0649, RR-0490, RR-0217, RR-0163, RR-0025, RR-0981, RR-0640, RR-0613, RR-0493, RR-0747, RR-0574, RR-0622, RR-0527, RR-0455, RR-0412</p> <p>RR-0030, RR-0043, RR-0767, RR-0137, RR-0194, RR-0266, RR-0333, RR-0397, RR-0408, RR-0454, RR-0472, RR-0622, RR-1149, RR-1124,</p>	
Ecology and Biodiversity	Habitats	Concern about the loss of habitats caused by the Proposed Development and the subsequent impacts on the wildlife as a result.	<p>RR-0966, RR-0901, RR-0864, RR-0859, RR-0739, RR-0738, RR-0735, RR-0681, RR-0637, RR-0582, RR-0488, RR-0460, RR-0445, RR-0284, RR-0424, RR-0335, RR-0652, RR-1199, RR-0713, RR-0871, RR-0933, RR-1113, RR-0484, RR-0334, RR-1090, RR-0230, RR-0492, RR-0479, RR-0364, RR-0249, RR-</p>	<p>The extent of the design of the Proposed Development retains the majority of the Habitats of Principal Importance within the Order limits, as set out in Section 7.5 of Ecology and Biodiversity chapter of the ES <b>[APP-037]</b>.</p> <p>The only substantial loss of habitats will be as a result of arable land being replaced with the PV Arrays and associated infrastructure (such as access tracks and fixed plant), permanent grassland underneath the PV Arrays and wildflower grassland in other areas. Where arable land is replaced with hard standing (for example access tracks and Solar Stations), this represents a minor loss in terms of ecological</p>

			<p>0804, RR, 0355, RR-1001, RR-0890, RR-0373, RR-0578, RR-0318, RR-0075, RR-0689, RR-1055, RR-0416, RR-1028, RR-0753, RR-1192, RR-0097, RR-0144, RR-1159, RR-0894, RR-0388, RR-0803, RR-0037, RR-0429, RR-0599, RR-1118, RR-0770, RR-1059, RR-1024, RR-0967, RR-0952, RR-0939, RR-0830, RR-0828, RR-0765, RR-0709, RR-0687, RR-0651, RR-0616, RR-0610, RR-0607, RR-0553, RR-0465, RR-0454, RR-0369, RR-0351, RR-0296, RR-0264, RR-0254, RR-0241, RR-0157, RR-0137, RR-0073, RR-0034, RR-1181, RR-1163, RR-1119, RR-1110, RR-1102, RR-1093, RR-0807,</p> <p>RR-0137, RR-0194, RR-0333, RR-0454, RR-0397, RR-1091, RR-1149</p>	<p>value and is likely to be an adverse effect of significance at a Site level only. However, where arable land is replaced with other habitats such as grassland (even in the case of grazed permanent grassland with a moderate species diversity) the effect is likely to be an overall beneficial effect of significance at a District level.</p> <p>During the operational phase, the on-site habitats will be managed in accordance with the Landscape and Ecology Management Plan (LEMP) <b>[APP-210]</b>.</p> <p>Perimeter fencing around the solar array will comprise of wooden posts and wire mesh fencing. Perimeter fences will not be constructed through existing hedgerows or across ditches. There will also be clearances above ground, or the inclusion of mammal gates to permit the movement of wildlife. Larger mammals such as deer will not be able to access the Solar PV Site, but connections to existing and enhanced habitats within the Order limits will provide suitable foraging and hiding resources, and allow access to wider habitat resource beyond the Order limits.</p> <p>The habitat creation and enhancements will likely increase the amount of foraging habitat for bats, badgers, hedgehog, brown hare, harvest mouse, reptiles, amphibians and invertebrates. Measures will be put in place to enhance the value of retained arable habitats</p>
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				<p>for bird nesting as secured through the Outline Landscape and Ecological Management Plan (oLEMP).</p> <p>At the decommissioning phase, certain habitats, such as the grassland areas underneath the PV Arrays, may be removed and returned to arable land resulting in an adverse effect of significance at up to District level. However, this adverse effect is likely to represent only a return to the pre-development baseline conditions within the Solar PV Site. Measures to minimise accidental encroachment to certain habitat types during decommissioning are provided within the Outline Decommissioning Environmental Management Plans (oDEMP) <b>[APP-209]</b>.</p>
Ecology and Biodiversity	Flora and Fauna	Concerns about the irreversible impact the Proposed Development will have on the local environment and Flora and Fauna.	RR-1035, RR-0290, RR-0214, RR-0543, RR-0672, RR-0850, RR-0639, RR-1145, RR-0334, RR-0699, RR-0158, RR-0054, RR-0176, RR-0230, RR-0692, RR-0848, RR-1001, RR-1057, RR-0321, RR-0478, RR-0502, RR-0777, RR-0630, RR-0701, RR-0113, RR-0750, RR-0992, RR-1084, RR-0908, RR-0793, RR-0463, RR-0031, RR-	<p>The Green Infrastructure (GI) strategy for the Proposed Development has been prepared to create new habitats of biodiversity value, and/or biodiversity net gain and is secured through the Outline Landscape and Ecology Management Plan <b>[APP-210]</b>.</p> <p>The extent of the design of the Proposed Development retains the majority of the Habitats of Principal Importance within the Order limits, as set out in Section 7.5 of Ecology and Biodiversity chapter of the ES <b>[App-037]</b>.</p> <p>The only substantial loss of habitats will be as a result of arable land being replaced with the PV Arrays and associated infrastructure (such as access tracks and fixed plant), permanent</p>

			<p>0066, RR-0572, RR-1128, RR-1166, RR-0278, RR-0618, RR-0047, RR-0998, RR-0001, RR-0608, RR-0761, RR-1150, RR-1192, RR-0950, RR-1159, RR-0894, RR-0803, RR-0523, RR-1112, RR-0340, RR-0745, RR-1010, RR-1221, RR-0755, RR-0509, RR-0851,</p> <p>RR-0064, RR-0137, RR-266, RR-0333, RR-1091,</p>	<p>grassland underneath the PV Arrays and wildflower grassland in other areas. Where arable land is replaced with hard standing (for example access tracks and Solar Stations, this represents a minor loss in terms of ecological value and is likely to be an adverse effect of significance at a Site level only. However, where arable land is replaced with other habitats such as grassland (even in the case of grazed permanent grassland with a moderate species diversity) the effect is likely to be an overall beneficial effect of significance at a District level.</p> <p>During the operational phase, the on-site habitats will be managed in accordance with the Landscape and Ecology Management Plan (LEMP) <b>[APP-210]</b>.</p> <p>Perimeter fencing around the solar array will comprise of wooden posts and wire mesh fencing. Perimeter fences will not be constructed through existing hedgerows or across ditches. There will also be clearances above ground, or the inclusion of mammal gates to permit the movement of wildlife. Larger mammals such as deer will not be able to access the Solar PV Site, but connections to existing and enhanced habitats within the Order limits will provide suitable foraging and hiding resources, and allow access to wider habitat resource beyond the Order limits.</p>
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				<p>The habitat creation and enhancements will likely increase the amount of foraging habitat for bats, badgers, hedgehog, brown hare, harvest mouse, reptiles, amphibians and invertebrates. Measures will be put in place to enhance the value of retained arable habitats for bird nesting as secured through the Outline Landscape and Ecological Management Plan (oLEMP).</p> <p>At the decommissioning phase, certain habitats, such as the grassland areas underneath the PV Arrays, may be removed and returned to arable land resulting in an adverse effect of significance at up to District level. However, this adverse effect is likely to represent only a return to the pre-development baseline conditions within the Solar PV Site. Measures to minimise accidental encroachment to certain habitat types during decommissioning are provided within the Outline Decommissioning Environmental Management Plans (oDEMP) <b>[APP-209]</b>.</p>
Ecology and Biodiversity	Sheep Grazing	Supporters of the land around the Proposed Development to be used for sheep grazing.	RR-0827, RR-0018, RR-0181	Noted.
Ecology and Biodiversity	Mitigation measures	Further clarification is requested on the proposed mitigation measures for the local wildlife and habitats.	RR-0730, RR-0653, RR-0978, RR-1128, RR-0143, RR-1161, RR-1066	Chapter 7: Ecology and Biodiversity, of the ES <b>[APP-037]</b> , presents the approach and findings of the assessment of potential impacts on and proposed mitigation measures for Ecology and Biodiversity.



				<p>The embedded mitigation measures include the details set out in the outline Construction and Environmental Management Plan (oCEMP) <b>[APP-207]</b>, outline Decommissioning and Environmental Management Plan (oDEMP) <b>[APP-209]</b> and outline Landscape and Ecology Management Plan (oLEMP) <b>[APP-210]</b></p> <p>These documents have been prepared and include mitigation measures which are intended to avoid the risks of effects during the construction and decommissioning phases, such as indirect and direct damage to retained features, direct damage to active bird nests and injury to protected species or damage to the habitat of those species. The assessment of potential effects takes these measures into account.</p> <p>Perimeter fencing around the solar array will comprise of wooden posts and wire mesh fencing. Perimeter fences will not be constructed through existing hedgerows or across ditches. There will also be clearances above ground, or the inclusion of mammal gates to permit the movement of wildlife. Larger mammals such as deer will not be able to access the Solar PV Site, but connections to existing and enhanced habitats within the Order limits will provide suitable foraging and hiding resources, and allow access to wider habitat resource beyond the Order limits.</p>
Ecology and Biodiversity	Impact on birds	Concern about the impact of the Proposed	RR-0334, RR-1090, RR-1088	Chapter 7: Ecology and Biodiversity, of the ES <b>[APP-037]</b> , presents the approach and findings

		<p>Development on the local bird population.</p>	<p>RR-0137, RR-0454, RR-0397, RR-1091</p>	<p>of the assessment of potential impacts on Ecology and Biodiversity, including on wintering and breeding birds.</p> <p>The embedded mitigation measures include the details set out in the outline Construction and Environmental Management Plan (oCEMP) <b>[APP-207]</b>, outline Decommissioning and Environmental Management Plan (oDEMP) <b>[APP-209]</b> and outline Landscape and Ecology Management Plan (oLEMP) <b>[APP-210]</b>.</p> <p>These documents have been prepared and include mitigation measures which are intended to avoid the risks of effects during the construction and decommissioning phases, such as indirect and direct damage to retained features, direct damage to active bird nests and injury to protected species or damage to the habitat of those species. The assessment of potential effects takes these measures into account and concludes that no likely significant adverse effects are expected to arise.</p> <p>The higher value habitats, such as hedgerow, scrub and woodland, which support breeding bird habitat are to be retained and enhanced within the Solar PV Site, such as by reducing the intensity of hedgerow management (as set out in the oLEMP) <b>[APP-210]</b>.</p> <p>It is likely there will be a loss of a number of skylark territories as a result of the installation of the PV Arrays. This would be an adverse effect of significance at up to a District level.</p>
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				<p>However, measures will be put in place to enhance the value of retained arable habitats for nesting as set out in the oLEMP. This will include the provision of skylark plots as per guidance for arable land in use for growing cereal crops. The plots will be provided in retained arable land within the Order limits. Mitigation within retained arable being delivered for skylark will also deliver some benefit for yellow wagtail and lapwing.</p> <p>The Order limits does not support wintering wildfowl or waders in significant numbers, and species listed as the qualifying interest of with the Rutland SPA do not occur within the Solar PV Site in significant numbers or regularly. There is therefore unlikely to be any effect on the Rutland Water SPA, RAMSAR site as a result of the Proposed Development.</p>
Ecology and Biodiversity	Impact on deer groups	Concern about the impact of the Proposed Development on the large deer groups within the surrounding vicinity of the Site.	RR-0845, RR-0932, RR-1042, RR-0657, RR-0680, RR-0229, RR-0824, RR-0120, RR-0996  RR-0454, RR-0397	<p>Chapter 7: Ecology and Biodiversity, of the ES <b>[APP-037]</b>, presents the approach and findings of the assessment of potential impacts on Ecology and Biodiversity, including on protected and notable species such as otter, wintering and breeding birds.</p> <p>Perimeter fencing around the solar array will comprise of wooden posts and wire mesh fencing. Perimeter fences will not be constructed through existing hedgerows or across ditches. There will also be clearances above ground, or the inclusion of mammal gates to permit the movement of wildlife. Larger mammals such as deer will not be able to access the Solar PV Site, but connections to</p>

				<p>existing and enhanced habitats within the Order limits will provide suitable foraging and hiding resources, and allow access to wider habitat resource beyond the Order limits.</p> <p>The design of the Proposed Development has specifically sought to provide corridors for the movement of deer and other species, re-linking existing habitats that have become fragmented by modern agricultural practices.</p>
Ecology and Biodiversity	Microclimates	Concerns that Solar panels will create microclimates	RR-0137, RR-1091	<p>The Solar Array will be installed over arable land, with this habitat being replaced with grassland, therefore changes in microclimate are not relevant and would not have detrimental effects.</p> <p>The types of panels being installed do not reflect solar energy and would not result in burning of any wildlife.</p> <p>Chapter 7: Ecology and Biodiversity, of the ES <b>[APP-037]</b>, presents the approach and findings of the assessment of potential impacts on Ecology and Biodiversity. The ecological and biodiversity assessment follows the general approach to undertaking EIA as explained in Chapter 2 of the ES, albeit it has been modified to take account of the main guidance document used when assessing impacts on ecological features, which is the Ecological Impact Assessment (EclA) guidance published by the Chartered Institute for Ecology and Environmental Management (CIEEM) in 2018.</p>

				<p>The proposed PV Arrays have not yet been selected; however, these will be chosen at the time of commissioning the Proposed Development and as per best practice will seek to utilise panels with anti-reflective coating (ARC) This will therefore avoid the potential effect of attracting invertebrates. The perceived risk of polarised light is that it may attract aquatic invertebrates to the array.</p>
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## Environmental Statement – Other Topics

Topic	Theme	Summary of points raised	RR reference	MPSF's Response
Environmental Statement	Methodology and surveys	Concerns about scope of the Environmental Impact Assessment and the Other Environmental Topics including Air Quality, Glint and Glare, Major Accidents and/or Disasters and Utilities	RR-0043, RR-1149	<p>The Planning Inspectorate was consulted regarding the scope of Environmental Impact Assessment through an EIA Scoping Opinion Request [EN010127/APP/6.2] [APP-049]. The Planning Inspectorate provided an EIA Scoping Opinion [EN010127/APP/6.2] [APP-050] and the Environmental Statement is based upon this Scoping Opinion. The Scoping Opinion Matrix [EN010127/APP/6.2] [APP-051] sets out how the ES accords with the EIA Scoping Opinion. The Planning Inspectorate agreed that human health impacts should be addressed through the relevant technical assessments:</p> <ul style="list-style-type: none"> <li>• Highways and Access (APP-039)</li> <li>• Noise and Vibration (APP-040)</li> </ul> <p>Other Environmental Topics including Air Quality, Glint and Glare, Major Accidents and/or Disasters and Utilities) (APP-045).</p>
Other Environmental Impacts	Glint and Glare	Concerns of glint and glare impact on local species within the area.	RR-0137, RR-1091, RR043	<p>Chapter 7: Ecology and Biodiversity, of the ES [APP-037], presents the approach and findings of the assessment of potential impacts on Ecology and Biodiversity. Evidence for birds landing on, or colliding with, solar panels is limited and not directly applicable to the UK. Large scale and long running monitoring projects carried out by Clarkson &amp; Woods (2019, 2020 &amp; 2021) resulted in a number of annual reports on a multiple sites and no evidence of death as a result of collision with solar panels by birds</p>

				has been recorded. These studies also do not mention accidental deaths by mammals and we are not aware of any evidence of this.
Other Environmental Impacts	Artificial Light	Concerns about light pollution from security floodlights and operational lighting.	RR-0333, RR-0782, RR-0771	<p>The Design Guidance within the Design and Access Statement <b>[APP-204]</b> and outline Operational Environmental Management Plan <b>[APP-208]</b> set out the measures of how lighting will be controlled during the operational phase of the proposed development.</p> <p>During operation, no part of the Solar PV Site will be continuously lit. CCTV cameras would use night-vision technology, which would be monitored remotely and avoid the need for night-time lighting. For security requirements, Passive Infra-red Detector (PID) systems (or similar) will be installed around the perimeter of the PV Arrays to provide night vision functionality for the CCTV. The landscape and visual impact assessment within the ES <b>[APP-036]</b> has assessed night effects as a result of lighting and no significant effects are identified.</p>
Other Environmental Impacts	Glint and Glare	Concerns of glint and glare from the solar panels impacting road users including drivers, cyclists, horse-riders, walkers, and local residents.	RR-0333, RR-1149, RR-1059, RR-1038, RR-0607, RR-0553, RR-0275, RR-0240, RR-0059, RR-0043, RR-1033, RR-0726, RR-0325, RR-0228, RR-088, RR-0515.  RR-11249, RR-0043	A Glint and Glare Assessment is provided at Appendix 15.3 of the ES, which assesses the likely impacts of the development upon receptors <b>[APP-0104]</b> . The modelling has shown that solar reflections are geometrically possible towards 113 of the 179 assessed dwelling receptors. Solar reflections towards most of these dwellings are predicted to be significantly obstructed by existing and proposed screening, or they

				<p>do not occur for a duration that could be considered significant.</p> <p>Additional mitigation will be implemented for one dwelling (number 166) due to significant effects being predicted. An area of new and improved hedgerow is proposed to be planted to the east of the dwelling which will provide filtering and screening of the Solar PV Site.</p> <p>In terms of impacts on road traffic, the assessment concludes that screening in the form of existing vegetation and proposed screening is predicted to significantly obstruct all views of the reflecting panels from road traffic and as such no significant effects are likely.</p>
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## **ANNEX A - ALC Results for the Order Limits and Solar PV Site Area**

## ALC Results for the Order Limits and Solar PV Site Area

ALC#	Order Limits		Solar PV Site and field margins		Area for biodiversity and arable	Area affected by substation and fixed equipment
	Area (ha)	Area (% of total Site)	Area (ha)	Area (% of Solar PV Site)	Ha	Ha
Grade 1	0	0%	0	0%	0	0
Grade 2	100	11.7%	35	6.6%	65	0.5
Grade 3a	260	30.5%	181	34.1%	79	3.7
Grade 3b	439	51.5%	297	55.9%	142	9.9
Grade 4	18	2.1%	18	3.4%	0	0.3
Grade 5	0	0%	0	0%	0	0
Non-agricultural	0	0%	0	0%	0	0
Urban	3	0.4%	0	0%	-	3
Not surveyed (roads, railways, verges etc)	32	3.8%	0	0%	-	0
<b>Total</b>	<b>852</b>	<b>100%</b>	<b>531</b>	<b>100%</b>	<b>286</b>	<b>17.4</b>

# The ALC identifies the areas in hectares and the proportions of land in each grade. All figures are rounded to the nearest hectare.