

Gate Burton Energy Park

EN010131

Applicant Responses to Interested Party Submissions at Deadline 2
Document Reference: EN010131/APP/8.15
September 2023

Rule 8(1)(b)
Planning Act 2008
Infrastructure Planning (Examination Procedure) Rules 2010

Prepared for:

Gate Burton Energy Park Limited

Prepared by:

Gate Burton Energy Park Team

© 2023 AECOM Limited. All Rights Reserved.

This document has been prepared by AECOM Limited ("AECOM") for sole use of our client (the "Client") in accordance with generally accepted consultancy principles, the budget for fees and the terms of reference agreed between AECOM and the Client. Any information provided by third parties and referred to herein has not been checked or verified by AECOM, unless otherwise expressly stated in the document. No third party may rely upon this document without the prior and express written agreement of AECOM.

Table of Contents

1. Introduction.....	1
Overview.....	1
2. Table 2 - 1: Applicant Responses to Responses to ExA's First Written Questions	2

1. Introduction

Overview

- 1.1.1 This report responds to the Responses to Examining Authority (ExA) First Written Questions that were submitted by Interested Parties at Deadline 2 (8 August 2023). A total of 11 responses to ExA's questions were submitted to the Examination at Deadline 2. Some of the community responses to the ExA's questions were further general representations rather than specific responses to the questions asked. In such cases, the Applicant has dealt with the representations in its response to written representations [document 8.19] instead of this document.
- 1.1.2 Table 2-1 summaries the comments made and Applicant's response to them. Heading references mirror those used in the ExA's First Written Questions dated 12 July 2023.

2. Table 2 - 1: Applicant Responses to Responses to ExA’s First Written Questions

Response Reference	Question Number	Summary	Applicant response
REP2-088	1.1.21	<p>Management Plans, Point 1</p> <p>To add to your reference I am exceedingly concerned about the fire risk element of the batteries.</p> <p>a, Fire Brigade access? - limited number of vehicles to access rough / water logged terrain</p> <p>b, Currently only foam and sand can extinguish battery fires - the Fire Brigade do not carry sand in large quantities. In recent cases they have been left to burn out.</p> <p>c, Evacuation plan local residents - the gases given off are very toxic. How far will gases travel based upon a wind model?</p> <p>d, What are the health effects of inhaling these gasses?</p> <p>e, Implications on the immediate area - contamination etc. As I understand no large solar development has taken place so close to local population and therefore the risks factors not been taken into account.</p>	<p>The Applicant has engaged with the Lincolnshire Fire and Rescue Service (LFRS) to advise on design and a safety management plan and to provide the emergency services with relevant information if requested. The Applicant has had a virtual meeting with Lincolnshire’s Fire and Rescue team and this engagement will continue throughout the development, construction and operation of the Scheme. The Outline Battery Safety Management Plan [APP-222/7.1] includes information on battery safety, including Fire Service Access in Section 4.2.</p> <p>The Applicant is intending to provide further information on the BESS and safety at Deadline 4 (3 October 2023).</p>
REP2-095	1.1.21	<p>Q1.1.21 How is it possible to create a safety plan for battery storage systems that is fully functional and effective when the manufacturer certifies the systems on their own and there is no government legislation proving they are safe?</p> <p>Having battery storage facilities so close to one another and the neighbourhood does not demonstrate any safety mitigation. Why do we need these systems if they can only store electricity for four hours and not for the colder months when energy is in high demand? Will this turn out to be a repeat of the Grenfell tragedy, where inadequate health and safety management and the usage of unregulated technology put everyone’s safety in danger? This should not be allowed to happen when there are so many of these systems</p>	<p>Government Legislation and Battery Storage Systems</p> <p>The Applicant’s BESS safety document [APP-222/7.1] details a list of global testing and certification standards that a BESS system must comply with at the detailed design stage.</p> <p>Furthermore, as stated in the Outline Battery Fire Safety Management Plan [APP-222/7.1] the detailed design stage will consider the lifecycle of the battery system from installation to decommissioning. Risk assessment tools would be utilised together with detailed consequence modelling to</p>

Response Reference	Question Number	Summary	Applicant response
		<p>needed. Q1.1.21vii) The developer has not taken any measures to regulate traffic, including measures to take into account four developments and 7,000,000 solar panels. These large amounts of traffic will be travelling on very insufficient roads, some of which are single-file</p>	<p>provide a comprehensive site operations and emergency response safety audit.</p> <p>The Applicant is intending to provide further information on the BESS and safety at Deadline 4 (3 October 2023).</p>
<p>REP2-049 (LCC)</p>	<p>1.1.21</p>	<p><u>Management Plans: Outline Battery Safety Management Plan.</u></p> <p>The management plan appears to consider all points raised by Lincolnshire Fire Rescue (LFR) in the initial position/requirements statement shared with the developer. Section 2 Consultation – 2.1.2 contains a table where points highlighted by LFR are considered with a proposed solutions outlined. There are a number of references to sections within the document for further information, but the references do not correspond with additional relevant information.</p> <p>There is further work to be carried out to ensure that water requirements can be satisfied. The plan outlines that work is being carried out with Anglian Water – Confirmation is required to ensure arrangements will meet minimum requirements outlined in LFR’s position statement.</p> <p>The Emergency Response Plan:</p> <p>Further work will be required to develop an agreed ERP – The document considers points to include, but no details at this stage</p>	<p>The Applicant is intending to provide further information on the BESS and safety at Deadline 4 (3 October 2023), including information on water supplies.</p>
<p>REP2-049 (LCC)</p>	<p>1.1.21</p>	<p><u>Management Plans: The Outline Landscape and Ecology Management Plan Document Reference: EN010131/APP/7.10</u></p> <p>The [management plan] provides information regarding the establishment and maintenance of the planting associated with the Development (as shown on Figure 10-23: Outline Landscape Masterplan).</p>	<p>Outline Landscape and Ecology Management Plan</p> <p>Noted. The glint and glare mitigation measures (in the form of hedgerows), as shown on Figure 5 of the Glint and Glare Assessment Part 1 [APP-173/3.3], is secured through the Outline Landscape and Ecological Management Plan (OLEMP) [APP-231/7.10]. The Outline Landscape Masterplan (in Annex A of the OLEMP) illustrates the areas of ‘advanced planting’ which are proposed but also extensive areas of</p>

Response Reference	Question Number	Summary	Applicant response
		<p>The success of the landscape mitigation to meet the objectives laid out in the management plan to integrate and screen proposals, promote conservation and protection of the environment and ecological and habitat diversity is highly dependent upon the successful management and maintenance of the new planting, as well as protection of existing trees and hedgerows.</p> <p>The maintenance operations provide an initial overview of operations; however we would expect the management plan be developed further and also last well beyond the initial 5 year period, particularly if landscape and visual effects are being assessed at 15 years: the reduction in landscape and visual effects presented in the LVIA are based on the success of landscape mitigation. Similarly, any early planting should be secured and implemented at the earliest opportunity as effects are also reduced in the LVIA based upon the assumption these are in place and have established as planned. Prior to any construction activities, all tree and hedgerow protection methods associated with that phase of construction should also be clarified and subsequently agreed with the appropriate authority. This would be to BS:5837 Trees in Relation to Construction and any subsequent arboricultural method statements, again which should be approved by the appropriate discharging authority. In particular this should ensure existing trees, and associated root protection areas, are suitable protected throughout the entire construction period. This would likely include areas within the order limits but away from construction activity as storage of materials or tracking over of plant will likely damage tree root protection areas.</p>	<p>existing hedgerows which will be strengthened/infilled to provide enhanced screening and allowed to increase in height to provide additional screening. The change in management of these hedgerows and use of advanced planting will provide effective screening well within the 15 year period and likely within 5 years (in the case of key advanced planting this will therefore have several years growth pre-development). These areas of advanced planting correspond with the mitigation measures for glint and glare. In addition, the Applicant has updated the draft DCO at Deadline 1 to require the Landscape and Ecological Management Plan to be submitted for approval before any advanced planting to allow for an early establishment of protective screening to ensure works to hedgerows and trees are only carried out in accordance with the LEMP approved by the relevant planning authority.</p> <p>The Framework CEMP [APP-224/7.3], Framework OEMP [APP-225/7.4], and Framework DEMP [APP-226/7.5], secure the mitigation measures required throughout the lifetime (construction, operation and decommissioning) of the Scheme, including mitigation for ecology and biodiversity.</p>
REP2-049 (LCC)	1.1.21	<p><u>Management Plans Skills, Supply Chain and Employment Plan [APP-228]:</u></p> <p><u>Skills Opportunities:</u></p> <p>Opportunity 1 – request details as how the apprenticeship programme is to be delivered and would expect details of the sorts of standards offered.</p> <p>Opportunity 2 – Similar to the above would expect something definite about offering vocational qualifications. Opportunity 1: Apprenticeships Apprenticeships can help fulfil</p>	<p>The Outline Skills, Supply Chain and Employment Plan [APP-228] is an outline plan that will be developed into a more detailed Skills, Supply Chain and Employment (SSCE) plan, which is secured through Requirement 18 of the DCO for the Scheme. The SSCE plan will be subject to approval by the relevant planning authorities. As stated within Requirement 18, the Plan must identify opportunities for individuals and businesses to access employment and supply chain opportunities associated with that part of the authorised development and the means for publicising such opportunities.</p>

Response Reference	Question Number	Summary	Applicant response
		<p>labour and skills requirements for employers in a cost-effective way, while also providing paid employment, training, and potential pathways into employment for apprentices.</p> <p>Apprenticeship providers in the area include: • Gainsborough College • Lincoln Art College • Lincoln College • Lincoln University Technical College • Ridgeway College • Riseholme College • University of Lincoln</p> <p>Why referencing initial engagement with Boston College when there are more accessible Apprenticeship Providers in the area. Boston College isn't included in the list of Apprenticeship Providers! The information on Opportunities 3 and 4 is much stronger than for Opportunities 1 and 2. Request more information in regard to the areas covered by opportunities 3 and 4. Also needs to be a social value element such as providing volunteer hours for a local community project or work experience for specific cohorts. Finally, on Opportunity 4, Local recruitment, would expect some sort of Sector Based Work Academy to be included, ie working with JCP, a training programme linked to a definite job opportunity, for the benefit of the local community.</p>	<p>Notwithstanding this, as a guide, apprenticeship opportunities are most significant in the construction phase and in roles supporting this particular function. Low Carbon works with various Engineering, Procurement and Construction Contractors (EPCs) to design, procure and construct the sites it develops.</p> <p>Typically, the EPC would encourage and support apprenticeships during the construction phase and the length of the apprenticeship varies depending on the level of qualification, and can be up to 36 months for Level 4. Nationally Significant Infrastructure Projects, such as Gate Burton, therefore provide great scope to deliver apprenticeships due to their scale and the timescales to construct.</p> <p>Examples of roles for apprenticeships include:</p> <ul style="list-style-type: none"> - Quantity Surveying - Civil Engineering - Electro-Technical Engineering <p>Low Carbon would lead the EPC in advertising apprenticeship roles following the grant of the DCO and this would be aimed primarily at local people. At the end of the fixed term apprenticeship contract there may also be opportunity to transfer into a permanent role or move on within the sector.</p> <p>Another typical opportunity includes graduate programmes. Graduate programmes include opportunities in general management, engineering and finance. Revolving placements are relatively standard and allow opportunities for graduates to work on different projects and in different areas of the business. For instance; supporting engineering teams and project managers. A graduate would typically be hired for two years, providing them with 6-month placements in different parts of the business. Again, at the end of the fixed term contract there may also be opportunity to transfer into a permanent role or move on within the sector.</p>

Response Reference	Question Number	Summary	Applicant response
			<p>Finally, for clarity, Boston College is referenced as they reached out to the Applicant on 25th October 2022 as they wanted to develop their understanding of what is required in the renewable energy sector regarding training and skills for young people in the future. The Applicant responded on the 9th November 2022 and remains open to discussing training and skills with the college.</p>
<p>REP2-047 (Bassetlaw DC)</p>	<p>1.1.21</p>	<p><u>Management Plans: Framework Construction Environmental Management Plan (fCEMP):</u></p> <p>The Framework Construction Environmental Management Plan appears to be comprehensive in nature. As a framework, it acknowledges that further specific detailed Construction Environmental Management Plans will be developed to encompass different elements of the scheme. I would expect such a specific CEMP to relate specifically to the construction of the cabling route into the Cottam sub-station to be drafted in due course.</p>	<p>Mitigation measures to avoid or reduce potential adverse impacts during the construction phase (including due to underground cabling) will be implemented by the CEMP. A Framework CEMP has been submitted as part of the DCO Application [APP-224/7.3]. The measures contained within the Framework CEMP are secured via Requirement 12 in the draft DCO [REP2-027]. It is not considered practical to provide separate CEMPs for different geographic areas because this would result in duplication in the production, review and approval of multiple CEMPs. Notwithstanding, the CEMP includes commitments that are site specific to address management of locally specific matters, for example site specific written schemes of investigation as part of the Archaeological Mitigation Strategy.</p>
<p>REP2-047 (Bassetlaw DC) REP2-053 (NCC)</p>	<p>1.1.21</p>	<p><u>Management Plans: Outline Construction Traffic Management Plan:</u></p> <p>...to minimise disruption, it would make sense for all the solar projects to share the same access arrangements. Access via the Cottam railway line and the River Trent should be considered.</p> <p>It is suggested (CTMP para.6.1.2) that the accesses to the grid connection corridor will be retained to facilitate occasional maintenance and repairs. The need for access is likely to be very infrequent and unlikely to involve vehicles as large as the cable drum transporter. If there is a genuine need to retain these accesses, they should be reduced in size suitable for the largest vehicle likely to visit to reduce the possibility of them being used as unintended laybys or areas that would attract fly tipping as they are not likely to be well observed.</p> <p>A Delivery Management System (CTMP para.7.4.4) will be implemented to control bookings of HGV deliveries from the start of the construction period. There is no</p>	<p>In terms of transporting materials, there is no rail infrastructure (stations/sidings) in close proximity to the Solar and Energy Storage Park to suggest that there would be the potential to bring materials by rail. In addition, the section of railway to the northwest of Cottam is disused and the section of railway near West Burton Power station would still require HGVs to use the local highway network through nearby villages in order to access the Grid Connection Corridor and would therefore offer limited benefit.</p> <p>The use of the River Trent for freight was considered but ruled out due to the weight of equipment being transported (including abnormal loads such as cable drums). It was also considered that river transport would offer limited benefit as construction of the Grid Connection Corridor is only expected to result in up to 16 HGV's per day.]</p> <p>The Applicant has engaged with Nottinghamshire County Council on how accesses can be amended post construction to avoid unnecessarily large accesses and have confirmed that any construction access required for</p>

Response Reference	Question Number	Summary	Applicant response
		<p>indication as to how that will be coordinated with the West Burton, Cottam, and Tillbridge solar projects that potentially will require access to the grid connection corridor at the same time. The most practical solution is for the grid connections to each solar project to be carried out in a single operation where they share the same corridor (CTMP para 7.6.1). Volume 1, Chapter 16: Cumulative Effects and Interactions Document Reference: EN010131/APP/3.3 Table 16.4 states that the other schemes are not likely to contribute to the effects on transport and access receptors including on Cottam Road, Headstead Bank, Broad Lane, Cow Pasture Lane, and Town Street. If not properly coordinated, they all might as access is required from single track roads and a narrow byway where vehicles would have limited opportunities to pass.</p> <p>It is not clear whether there is likely to be sufficient temporary accommodation (CTMP 7.5.9) in the suggested residential centres to make the use of a shuttle bus service viable, particularly as employees from the other solar projects may be competing for the same accommodation.</p>	<p>the grid connection corridor will be amended to suit the long term operational layout requirements. The layout of these accesses during operation are to be agreed with Nottinghamshire County Council. The Applicant is aiming to update the Framework Construction Traffic Management Plan at Deadline 4 (3 October 2023) to provide reassurance on how this process would be completed.</p> <p>The Applicant acknowledges Nottinghamshire County Council's point on sharing access arrangements with other developers for the shared grid connection corridor and has been working with the other developers to explore opportunities to do this.</p> <p>At present there is no certainty that any of the four schemes will be consented. If they are all consented, they may be subject to different requirements on construction traffic and project timescales. The Applicant has no authority over the actions of other parties and the DCO for the Gate Burton scheme, if made, would not directly govern their activities. Nonetheless, it is the Applicant's intention to work with the developers of Cottam, West Burton and Tillbridge projects to develop joint mitigation and this approach has been agreed between the parties as evidenced in the Interrelationships Report and the cooperation agreement entered into. The Framework CTMP for the Gate Burton Energy Park sets out this possibility in paragraph 3.2.6 and 7.6.1 [REP2-020-021/3.3]. A Joint CTMP could support implementation of shared mitigation measures such as joint traffic management, joint consultation with Lincolnshire County Council traffic officers, combined vehicle access and routeing plans, shared use of construction compounds, taking a holistic approach to construction traffic planning and management. In the meantime, the four developers are working closely together to identify further ways to collaborate and reduce impacts on communities and the environment. Progress on this is reported in the Interrelationships Report submitted at Deadline 1 [REP-033/8.2], which will be updated at Deadline 4 (3 October 2023). Should there be updates to the proposals for shared accesses, these will be detailed in this report.</p> <p>A Cumulative Effects Transport and Access Technical Note was submitted at Deadline 1 as an Appendix (Appendix A) to the Interrelationship</p>

Response Reference	Question Number	Summary	Applicant response
			<p>Report [REP-033/8.2]. This technical note provides a comprehensive cumulative assessment impact of the three named schemes: West Burton, Cottam and Tillbridge (and Gate Burton). The Technical Note concludes that following a further review of the potential cumulative impacts of West Burton, Cottam and Tillbridge, the findings of ES Chapter 13 [APP-022/3.1] of the Gate Burton Energy Park ES are considered to remain unchanged.</p> <p>One of the most recent areas of discussion has been around the potential to combine accesses within the shared grid connection corridor. Discussions are ongoing on this point. An Access Updates and Cumulative Impact Assessment [REP2-045/8.10] was submitted at Deadline 2. This TN sets out the revised access proposals for the Gate Burton project. These revisions have occurred to further reduce the environmental effects of accesses, including both those from the Gate Burton scheme alone and cumulative effects. In particular, following discussions with the other three developers, the Applicant relocated Access P: Cottam Road South to align with that proposed by the Cottam/West Burton and Tillbridge developers. This has reduced the need for two accesses in close proximity to one another and reduced cumulative hedgerow removal required. The Applicant has submitted revised plans to accompany this proposed change, see [8.10] for more information.</p> <p>In terms of temporary accommodation, as stated within Chapter 12: Socio-economics [APP-021/3.1] 100% of the peak construction workers could be accommodated in residential centres within a 60-minute drive time of the Scheme which includes peak construction workers for West Burton 2 and 3, and Cottam 1 (the developments located within the zone of influence of the Proposed Development).</p>
REP2-053 (NCC)	1.1.21	<p><u>Management Plans: Archaeology Mitigation Strategy Part 1 [APP-227]</u></p> <p>NCC are in agreement with the comments of Bassetlaw DC's archaeological advisor [i.e. AMS is appropriate] but wish to make it clear that NCC's archaeologist (the County Archaeologist) has not been consulted or attended any meetings, as the documentation would appear to suggest. As a relevant authority for heritage and archaeology in</p>	<p>As set out in the NCC / BDC Statement of Common Ground, consultation was undertaken between October and December 2021 with the Archaeological Advisors to Lincolnshire County Council and Bassetlaw District Council. During this consultation, it was confirmed that the Archaeological Advisor to Bassetlaw District Council would represent Nottinghamshire County Council on all archaeological matters. This</p>

Response Reference	Question Number	Summary	Applicant response
		<p>Nottinghamshire. NCC would normally expect to be consulted alongside the archaeological advisors for the District Councils and Lincolnshire County Council. If the DCO is granted, we would wish to work alongside colleagues from the District Councils and Lincolnshire County Council on all matters regarding implementation of the proposed archaeological mitigation strategy.</p>	<p>consultation process is also set out in Section 7.2 of Chapter 7: Cultural Heritage of the ES [APP-016/3.1]. NCC will be consulted regarding the implementation of the archaeological mitigation strategy following consent of the DCO.</p>
<p>REP2-057 (WLDC)</p>	<p>1.1.21</p>	<p><u>Management Plans: Framework Construction Environmental Management Plan (fCEMP)</u></p> <p>The structure, scope and current detail within the fCEMP is considered to be sufficient. As commented in Q1.1.22 below WLDC requires there to be further clarification about the process when works occur outside of the core hours.</p>	<p>The Applicant can confirm that working outside of core hours is anticipated to be exceptional. Where work outside of times is necessary prior notification will be provided to the local planning authority (LPA). In the event that works exceed the core working hours, WLDC will be notified the following day, with the information requested provided (refer below).</p>
<p>REP2-057 (WLDC)</p>	<p>1.1.21</p>	<p><u>Management Plans: Outline Landscape and Ecology Management Plan (OLMP)</u></p> <p>The structure, scope and current detail within the fCEMP is considered to be sufficient for decision making purposes and for securing through the proposed DCO Requirement. WLDC does however maintains concerns around the cumulative approach and impacts upon the successful implementation of the OLEMP (e.g. within the cable corridor). More detail around how projects will be phased and mitigation delivered is required to avoid abortive implementation of measures, which could elongate the time period for when mitigation is delivered.</p>	<p>At present there is no certainty that the other schemes will be consented, or the timescales that consents might be granted. Phasing of all schemes therefore remains uncertain, particularly for Tillbridge given that no application has yet been submitted.</p> <p>The Applicant has no authority over the actions of other parties and the DCO for the Gate Burton scheme, if made, would not directly govern their activities. Nonetheless, it is the Applicant's intention to work with the developers of Cottam, West Burton and Tillbridge projects to develop joint mitigation and this approach has been agreed between the parties as evidenced in the Interrelationships Report and the cooperation agreement entered into. The Interrelationships report also provides information on project timescales as far as the parties are currently aware. It is for these reasons that the best time to agree final mitigation measures is after determination of the DCO application, through development of the final CEMP, LEMP and CTMP.</p>
<p>REP2-057 (WLDC)</p>	<p>1.1.21</p>	<p><u>Management Plans: Outline Skills, Supply Chain and Employment Plan</u></p> <p>The Outline Skills, Supply Chain and Employment Plan (OSSCEP) does not take into account the impact on the loss of agricultural income for local farms and farmers who have been producing for multiple generations. It is likely a 60 year hiatus will end this practice and lead to a loss of employment in farming in West Lindsey. WLDC is concerned as to who will be available in the year 2088, when the scheme is eventually</p>	<p>The loss of existing jobs within the site is assessed within ES Chapter 12 [APP-160/3.1] which explains that 1.5 existing jobs will be lost as a result of the Scheme. However during the operational phase there will be a gross number of 14 FTE jobs generated by the Scheme.</p> <p>The agricultural employment from the current arable, energy crop and biodiversity land management enterprises will change. Should the site be</p>

Response Reference	Question Number	Summary	Applicant response
		<p>decommissioned, to simply pick up and begin farming the land once again. The impact on agricultural land tenant farmers should also be considered in the wider context of the four proposed solar NSIPs.</p>	<p>grazed by sheep during the operational phase, there would be agricultural employment during the operational phase from the management of sheep and grassland. What agricultural enterprises will be selected at the end of decommissioning will be influenced by a great number of factors, not least how well we have contained climate change. Management will also be required for landscape and ecological planting. If the land is not grazed by sheep, alternative vegetation management would be required, continuing similar activities on the land, albeit not for agricultural purposes.</p>
<p>REP2-057 (WLDC)</p>	<p>1.1.21</p>	<p><u>Management Plans: Outline Construction Traffic Management Plan</u></p> <p>With regard to the structure, scope and current level of detail of the Outline Construction Traffic Management Plan insofar as it relates solely to the Gate Burton project, WLDC considers the document to be sufficient for decision making purposes and delivery through a DCO Requirement.</p> <p>With regard to the mechanisms used to control construction traffic cumulatively with other projects however, WLDC maintains significant concerns regarding the lack of detail on how such impacts will be controlled. A detailed explanation of these concerns are set out in WLDC's Local Impact Report (REP-053) and Written Representation. The summary position of WLDC is that it wishes the applicant to provide, within the Outline Construction Traffic Management Plan, the measures to be adopted in event two or more projects are being constructed simultaneously. The approach should then be replicated in the control document for each cumulative project to enable communities to understand the traffic related activities in the area and how developers have sought to minimise impacts during the construction phase.</p>	<p>A commitment to prepare a combined CTMP, where practicable, has been included within the Framework CEMP submitted at Deadline 1 [REP-026/7.3]. This would manage and mitigate cumulative effects if necessary, once further details are known on project timeframes and the approach for the shared Grid Connection Corridor. A firm commitment cannot be given on a Joint CTMP because the Gate Burton DCO cannot control the actions of other developers, there is uncertainty that all schemes will be developed and certainty overall project timescales. However, should the grid corridor construction durations overlap, the Applicant is committed to seeking to prepare a Joint CTMP.</p>
<p>REP2-057 (WLDC)</p>	<p>1.1.21</p>	<p><u>Management Plans: Soil Management Plan</u></p> <p>As set out in WLDC's Local Impact Report (REP-053) and Written Representation, the methodology applied by the applicant in carrying out desktop assessments are considered to be inadequate.</p> <p>Due to the lack of robustness, an uncertainty remains in the baseline assessment, which flows through the EIA to the Soil Management Plan control document.</p>	<p>The Applicant disagrees that there is insufficient detail for an ALC assessment and production of a Soil Handling Management Plan. A semi-detailed soil survey was carried out in accordance with the MAFF (1988) guidelines which is the current methodology for ALC within the Solar and Energy Storage Park. Some 307 auger samples were taken over the 652 ha site. As it is common ground that ALC grade will not be changed, this provides a suitable level of detail. See the revised Statement of Common Ground [REP-009 to 010/4.3C] which confirms that Natural England are content with the sampling strategy. An ALC survey within the Grid Connection Corridor is nevertheless planned and will be carried out</p>

Response Reference	Question Number	Summary	Applicant response
		<p>The desktop assessments were undertaken for 13.3 ha of land within the solar farm itself and for the whole of the grid connection corridor, bringing the total desk assessment to 145 ha, which is 18% of the 824 ha of agricultural land within the Order Limits. Soil surveys were undertaken for the remainder of the site but only at a density of one auger bore per two hectares.</p> <p>Natural England's TIN 049 Agricultural Land Classification: protecting the best and most versatile agricultural land and its Guide to assessing development proposals on agricultural land specify a survey density of one bore per hectare therefore agreement with Natural England's Soil Specialist should be sought.</p> <p>The soil information provided by these surveys is essential for the preparation of a Soil Handling and Management Plan to ensure the land is restored to its original condition, in line with Defra's Construction Code of Practice for the Sustainable Use of Soils on Construction Sites.</p> <p>The level of soil detail is insufficient for an ALC assessment and production of a robust Soil Handling and Management Plan.</p>	<p>to inform the construction period. If this information is available prior to the end of the Examination, it is intended that this will be submitted to the Examination for information purposes.</p>
REP2-057 (WLDC)	1.1.22	<p>Re: whether LPAs are happy with the Applicant's approach to securing working hours outside of the regular working hours in the fCEMP:</p> <p>The CEMP states that the core working hours within the summer will be 07:00 to 19:00 Monday to Friday and 09:00 to 13:00 on Saturdays. Whereas within the winter the core working hours will be 08:00 to 18:00 Monday to Friday and 9:00 to 13:00 on Saturdays. The applicant states that there will be no Sunday or Bank Holiday working throughout the year. The CEMP also states "Some works activities may need to occur out of these hours/times due to activities requiring to be undertaken continuously such as horizontal direction drilling (HDD) and cable jointing). Where work outside of times is necessary prior notification will be provided to the local planning authority (LPA)."</p> <p>WLDC welcomes that the applicant will notify the local planning authority where work outside of times is planned, however WLDC request that working outside of these hours will be exceptional and agreed in advance with WLDC.</p>	<p>The Applicant can confirm that working outside of core hours is anticipated to be exceptional. Where work outside of times is necessary prior notification will be provided to the local planning authority (LPA). In the event that works exceed the core working hours, WLDC will be notified the following day, with the information requested provided.</p>

Response Reference	Question Number	Summary	Applicant response
		<p>WLDC also requests that when works which were unplanned exceed the core working hours, WLDC are notified the morning after. The notification should include the following information in order for WLDC to feedback to residents affected: • What works occurred? • Why they were unplanned? • What time did the works finish? • What measures will be put in place to ensure it will not occur again?</p>	
<p>REP2-057 (WLDC)</p>	<p>1.1.25</p>	<p>Re: do LPAs agree with the developments identified in the Cumulative Assessment in each chapter of the ES.</p> <p>Stow Park Solar Farm submitted an EIA Screening request in June 2023 and has subsequently been determined by WLDC as EIA development. Stow Park is situated approximately 1800m from Gate Burton and therefore construction traffic is likely to share the same haul routes. Therefore WLDC feel this should be included within the cumulative effects assessment.</p>	<p>The Cumulative Assessment has been undertaken in accordance with PINS Advice Note 17. As stated in paragraph 16.2.2 of Chapter 16: Cumulative Effects and Interactions [APP-025/3.1] a long list of cumulative developments was prepared and sent to Lincolnshire and Nottinghamshire County Council on the 01 November 2021. The long list of cumulative developments was also sent to WLDC on 12 October 2022 and BDC on 19 October 2022. No further schemes were requested to be included within the assessment. A response which considers the Schemes submitted subsequent to submission of the application in January 2023 will be provided at Deadline 4.</p>
<p>REP2-047 (Bassetlaw DC)</p>	<p>1.1.25</p>	<p>Re: do LPAs agree with the developments identified in the Cumulative Assessment in each chapter of the ES.</p> <p>Other applications that may be applicable in that they relate to energy developments are:</p> <p>23/00656/FUL-Development Site To The North Of Brick Yard Road Gamston Installation of a Solar Farm with an Output of Approximately 45.4MW and Ancillary Works Pending consideration</p> <p>22/01713/FUL - Gainsborough Road, Bole Construction and Operation of a Battery Energy Storage System with an Electrical Output Capacity of up to 500MW and Associated Development Including Power Inverter Systems, Electrical Banking Station, Electrical Cabling including Below Ground Cabling to 400KV Switchyard, Welfare Facilities, Internal Access Roads, Site Security Infrastructure, Lighting, Boundary Treatments, and Landscaping. Pending consideration</p>	<p>The Cumulative Assessment has been undertaken in accordance with PINS Advice Note 17. As stated in paragraph 16.2.2 of Chapter 16: Cumulative Effects and Interactions [APP-025/3.1] a long list of cumulative developments was prepared and sent to Lincolnshire and Nottinghamshire County Council on the 01 November 2021. The long list of cumulative developments was also sent to WLDC on 12 October 2022 and BDC on 19 October 2022. A response from Nottinghamshire County Council was received on 5th April which noted a number of additional schemes which are part of the 'County Matters' sites/developments, including Sturton Quarry for example. Follow up requests were then sent on 30 June 2022 and 12 October 2022. No further schemes were requested to be included within the assessment. A response which considers the Schemes submitted subsequent to submission of the application in January 2023 will be provided at Deadline 4.</p>

Response Reference	Question Number	Summary	Applicant response
		<p>22/00707/FUL Former High Marnham Power Station The Construction and Operation of a Solar Photovoltaic(PV) Farm with other Associated Infrastructure Including Sub Stations, Security Cameras, Fencing, Storage Containers, Access Tracks and Landscaping Grant - 05.01.2023</p> <p>22/00358/FUL - Gainsborough Road, Saundby Installation of a Solar Farm and Battery Storage Facility with Associated Infrastructure. Grant - 14.07.2022</p> <p>21/01552/VOC - Sturton Le Steeple Variation of Condition 2 on P. A. 20/00117/FUL - Extend the Temporary Period of Permission to 40 Years from When the Site Becomes Operational. Grant - 22.02.2022</p> <p>21/01147/FUL- Tuxford Road, Skegby Installation of a Solar Farm and Battery Storage Facility with Associated Infrastructure Grant - 16.12.2021</p> <p>There is also another strategic energy project which is connecting to High Marnham - North Humber to High Marnham National Grid ET</p> <p>There may be a capacity issue in terms of connecting to the existing power stations</p>	
REP2-088	1.1.26	<p>Q1.1.26 Decommissioning Irrespective of the time period of operation the decommissioning cost £ appears to not been taken into account. At the hearing the applicant stated that there is no £ provision would be made! On that basis who would be footing the cost? This must not be left open, the applicant needs to provide secured funds to deal with this issue prior to any commencement of work. They are reluctant to do this as they will have difficulty in selling the project to a prospective buyer. Where would the liability lay - land owner, government or asking our children's children to foot the bill in taxes would be unforgivable.</p>	<p>The Applicant has provided a Funding Statement which demonstrates that the Applicant has adequate funding available for the Scheme [APP-221/6.7]. The Applicant is also committed to decommissioning the Scheme as required by Requirement 19, breach of which is an offence pursuant to section 161 of the Planning Act 2008, therefore no additional security or assurance is necessary or appropriate. It is unprecedented for energy DCOs to require a bond or other form of security for decommissioning, and there is no justification for the Scheme or the Applicant to be subject to different requirements.</p>
6. draft Development Consent Order			
REP2-049 (LCC)	1.6.16	<p>dDCO - Article 9 - Power to alter layout etc of streets</p> <p>Regarding ExA question 1.6.16: "Article 9 (2) allows for the undertaker to alter the layout of any street. Can the Applicant confirm why such a wide power is necessary and whether additional schedules cannot be used to identify the traffic routes or streets that may be</p>	<p>The Applicant has updated Article 9(4) of the draft Order at Deadline 3, to confirm that the form of consent must be in the form reasonably required by the street authority to address LCC's concerns.</p>

Response Reference	Question Number	Summary	Applicant response
		<p>affected. Can the relevant Highway Authorities comment on the breadth of this power and whether it raises any issues for them.”</p> <p>This part appears to remove the obligation to enter a Section 278 Agreement under the Highways Act 1980, for any temporary or permanent highway works, which is not acceptable to the Local Highway Authority(LHA). There is insufficient information and detail within this application that would allow the LHA to accept highway works without further detail, under Section 278 of the Highways Act 1980. A provision must be included within the dDCO to ensure the applicant submits an application under Section 278 of the Highways Act 1980 to allow the LHA to technically review the detail and inspect the highway works throughout. Furthermore, the LHA must have the ability to require remedial works where necessary and charge a fee to cover the associated costs of the applications This should not be permitted by the DCO. Works in the highway need to follow S278 and Street Works and Permitting procedures.</p>	
REP2-053 (NCC)	1.6.16	<p>dDCO - Article 9 - Power to alter layout etc of streets</p> <p>Regarding ExA question 1.6.16: “Article 9 (2) allows for the undertaker to alter the layout of any street. Can the Applicant confirm why such a wide power is necessary and whether additional schedules cannot be used to identify the traffic routes or streets that may be affected. Can the relevant Highway Authorities comment on the breadth of this power and whether it raises any issues for them.”</p> <p>Article 9(4) prevents the exercise of the powers conferred by Article 9(2) without the consent of the street authority. To obtain that consent Nottinghamshire County Council would require the submission of detailed designs and specifications for approval, the payments of fees to cover design approval and works inspection, and for appropriate street works licences to be obtained or for agreements to be entered into in accordance with the Highways Act 1980 before issuing street works permits in accordance with the Traffic Management Act 2004 and Traffic Management Permit Scheme (England) Regulations 2007. The powers conferred by the DCO should not and nor is it necessary to circumvent existing statutory procedure.</p>	As noted above, the Applicant has updated Article 9(4) of the draft Order at Deadline 3, to confirm that the form of consent must be in the form reasonably required by the street authority.

Response Reference	Question Number	Summary	Applicant response
REP2-053 (NCC)	1.6.30	<p>dDCO Article 46 (and Schedule 16) (ExA's request for comments on ability to respond to applications, periods for compliance etc)</p> <p>The undertaker should comply with the statutory notification periods where such notification periods exist such as contained in the Nottinghamshire County Council Permit Scheme Order 2020 and obtain all necessary licences, agreements, and permits as applicable before commencing street works. An application if submitted six weeks prior to commencement would not comply with statutory notification periods and may not allow sufficient times for approvals to be granted as required by Article 9(4).</p>	<p>The Applicant has updated Article 46 of the draft DCO at Deadline 3 to refer to a period of eight weeks, following discussion on this point in ISH2 on the draft DCO.</p>
REP2-057 (WLDC)	1.6.30	<p>dDCO Article 46 (and Schedule 16) (ExA's request for comments on ability to respond to applications, periods for compliance etc)</p> <p>WLDC strongly objects to the Schedule 16 as currently drafted. The 6 week approval period currently required by Article 46.2 does not adequately reflect the usual timescale for EIA development which is 16 weeks. WLDC object to this deemed approval provision. The justification relied on the by the applicant is one of efficiency (Explanatory Memorandum at 6.16.1) do not cite any unique or specific reason why such a provision should be included. WLDC object to the requirement under Article 46.3.(2) that further information must be requested in 10 working days. The relevant determining authority will need to sufficiently assess the information in order to identify whether further information is required. WLDC submit that the usual fee provision (see the Longfield DCO), which has been excluded without any justification given by the applicant, is reinstated in Schedule 16.</p> <p>A detailed explanation to WLDC's objections to the drafting of Article 16 is set out in WLDC's Post Hearing Submission and Written Statement.</p>	<p>The Applicant has made various updates to the timescales in Schedule 16 of the draft DCO at Deadline 3, following discussion on this point at ISH2 on the draft DCO.</p>
REP2-049 (LCC)	1.6.36	<p>dDCO – Schedule 2 Requirements</p> <p>Regarding ExA question 1.6.36: "Can the relevant Local Authorities and Historic England (HE) confirm they are satisfied with Requirement 11 and that it safeguards archaeological interests."</p>	<p>The Applicant's position is that any further amendment is unnecessary as the form of archaeological mitigation strategy is agreed and comprises a secured document for the purposes of the DCO. Please see the Applicant's full response to this point in its written summary of oral submissions at ISH2, submitted at Deadline 3.</p>

Response Reference	Question Number	Summary	Applicant response
		the wording currently is: 'The authorised development must be implemented in accordance with the archaeological mitigation strategy.' Recommend it include 'as agreed with Lincolnshire County Council and Historic England.	
REP2-053 (NCC)	1.6.36	<p>dDCO – Schedule 2 Requirements</p> <p>Regarding ExA question 1.6.36: “Can the relevant Local Authorities and Historic England (HE) confirm they are satisfied with Requirement 11 and that it safeguards archaeological interests.”</p> <p>NCC are in agreement with the comments of Bassetlaw DC’s archaeological advisor but wish to make it clear that NCC’s archaeologist (the County Archaeologist) has not been consulted or attended any meetings, as the documentation would appear to suggest. As a relevant authority for heritage and archaeology in Nottinghamshire. NCC would normally expect to be consulted alongside the archaeological advisors for the District Councils and Lincolnshire County Council. If the DCO is granted, we would wish to work alongside colleagues from the District Councils and Lincolnshire County Council on all matters regarding implementation of the proposed archaeological mitigation strategy.</p>	<p>As set out in the NCC / BDC Statement of Common Ground, consultation was undertaken between October and December 2021 with the Archaeological Advisors to Lincolnshire County Council and Bassetlaw District Council. During this consultation, it was confirmed that the Archaeological Advisor to Bassetlaw District Council would represent Nottinghamshire County Council on all archaeological matters. This consultation process is also set out in Section 7.2 of Chapter 7: Cultural Heritage of the ES.</p> <p>NCC will be consulted regarding the implementation of the archaeological mitigation strategy following consent of the DCO.</p>
REP2-103 (Historic England)	1.6.36	<p>In answer to ExA’s written question “1.6.36 <i>We would expect the archaeological requirement (11) to also frame the process for (site specific) Written Schemes of Investigation (SS-WSI) to be submitted to LPAs post-DCO determination – with a requirement that the SS-WSI must be in accordance with outline written scheme of investigation (O-WSI) / archaeological mitigation strategy (AMS) that was submitted for the DCO determination. We also refer you to the Local Authority archaeological advisors as they would be advising the LPA’s on post consent discharges to this requirement. As it stands it’s unclear what process would secure curatorial oversight of the actual specific methodology for work carried out if this isn’t captured in requirement 11”</i></p>	<p>The process for Site-Specific Written Schemes of Investigation (SSWSIs) is set out in Section 4.1 of the AMS. The includes the requirement for the SSWSI to be prepared in accordance with the AMS and approved by the Archaeological Advisor to the relevant Local Planning Authority.</p> <p>Section 1.5 of the AMS has been updated and sets out the Roles and Responsibilities of all relevant parties, including the Archaeological Advisor to the relevant Local Planning Authority who will be responsible for ensuring that the requirements of the DCO are met, in accordance with any conditions relating to archaeology.</p> <p>Section 4.6 of the AMS has been updated and states that the Archaeological Advisor to the relevant Local Planning Authority will have final approval and sign-off of all mitigation sites.</p> <p>The updated AMS has been submitted at Deadline 3.</p>

Response Reference	Question Number	Summary	Applicant response
7. Historic Environment			
REP2-053	1.7.1	<p>Re ExA's request to confirm all heritage assets identified.</p> <p>NCC have checked plan 7.2 that accompanies the ES Vol 1 and can confirm that the Nottinghamshire non-designated Heritage Assets of the built environment are correctly identified.</p> <p>The comments of Bassetlaw DC are noted in respect of questions 1.7.1 – 1.7.5, 1.2.22 and 1.6.36. NCC are in agreement with the comments of Bassetlaw DC's archaeological advisor but wish to make it clear that NCC's archaeologist (the County Archaeologist) has not been consulted or attended any meetings, as the documentation would appear to suggest. As a relevant authority for heritage and archaeology in Nottinghamshire. NCC would normally expect to be consulted alongside the archaeological advisors for the District Councils and Lincolnshire County Council. If the DCO is granted, we would wish to work alongside colleagues from the District Councils and Lincolnshire County Council on all matters regarding implementation of the proposed archaeological mitigation strategy. This same response applies to questions 1.7.2, 1.7.3, 1.7.4, and 1.7.5.</p>	<p>As set out in the NCC / BDC Statement of Common Ground, consultation was undertaken between October and December 2021 with the Archaeological Advisors to Lincolnshire County Council and Bassetlaw District Council. During this consultation, it was confirmed that the Archaeological Advisor to Bassetlaw District Council would represent Nottinghamshire County Council on all archaeological matters. This consultation process is also set out in Section 7.2 of Chapter 7: Cultural Heritage of the ES [APP-016/3.1].</p> <p>NCC will be consulted regarding the implementation of the archaeological mitigation strategy following consent of the DCO.</p>
REP2-049 (LCC)	1.7.4	<p>Roles and responsibilities and implementation of AMS:</p> <p>The Archaeological Mitigation Strategy (EN010131/APP/7.6) both Parts 1 and 2 section 1.5.2 Roles and Responsibilities states that 'The Applicant will appoint an Archaeological Clerk of Works (ACoW) for the Scheme. The ACoW will be responsible for ensuring mitigation measures are correctly implemented, monitored and maintained during the construction phase of the works.'</p> <p>The Archaeological Clerk of Works will undertake those tasks and those of approval and sign-off (section 4.6) on behalf of their client.</p>	<p>Section 1.5 of the AMS has been updated and sets out the Roles and Responsibilities of all relevant parties, including the Archaeological Advisor to the relevant Local Planning Authority who will be responsible for ensuring that the requirements of the DCO are met, in accordance with any conditions relating to archaeology.</p> <p>Section 4.6 of the AMS has been updated and states that the Archaeological Advisor to the relevant Local Planning Authority will have final approval and sign-off of all mitigation sites.</p> <p>The updated AMS has been submitted at Deadline 3.</p>

Response Reference	Question Number	Summary	Applicant response
		<p>It should be made clear that it is the relevant local authority Lincolnshire County Council's Archaeological Advisors who have responsibility for ensuring that the requirements of the Development Consent Order are met in accordance with its archaeological condition. This includes ensuring that works are undertaken in accordance with the agreed mitigation strategy including implementation, monitoring of compliance and standards, approval and sign-off.</p> <p>While the roles of Lincolnshire County Council's Archaeological Advisors are included in sections 4.3 Stakeholders and Statutory Roles and 4.6 Approvals and Sign-Off of Archaeological Mitigation Sites, the role of the Archaeological Advisors needs updating particularly in the Roles and Responsibilities section 1.5 in the AMS Parts 1 and 2 to make role of the local authority clearly defined and that the Archaeological Advisors' responsibilities are defined as above and in relation to the Development Consent Order requirements regarding the Archaeological Condition.</p>	
REP2-057 (WLDC)	1.7.5	<p>Re: ExA's comment that para. 7.7.1 of the AMS does not make clear the process for and authority to agree or approve changes to the scheme design:</p> <p>Gate Burton would be consented based on the design parameters within the design envelope within the application. Therefore, any changes which are not currently accounted for within the Scheme Design would require the applicant to submit a written application to WLDC, then WLDC would review the design change application to ensure the changes were appropriate and no further impacts are identified.</p>	Section 7 of the AMS has been updated to clarify the process for agreeing and approving any changes to the scheme design and any required mitigation responses. The updated AMS has been submitted at Deadline 3.
REP2-047 (Bassetlaw DC)	1.7.5	<p>Re: ExA's comment that para. 7.7.1 of the AMS does not make clear the process for and authority to agree or approve changes to the scheme design:</p> <p>Archaeology - agrees that this section could be worded better. It does require the applicant to consult with the LPA archaeological advisor and presumably agree any updates relating to additional impacts. However, including a mechanism for formal approval by the relevant authority would be helpful here and might be necessary for enforcement if it becomes necessary</p>	Section 7 of the AMS has been updated to clarify the process for agreeing and approving any changes to the scheme design and any required mitigation responses. The updated AMS has been submitted at Deadline 3.

Response Reference	Question Number	Summary	Applicant response
REP2-053 (NCC)	1.7.6	<p>Re ExA question on Outline Design Principles (ODP) Heritage Setting Buffer (ES Volume 2: Figure 2- 4) – “Given the direct reference to Figure 2-4 [APP033] to identify the location of the Heritage Setting Buffer how is this to be secured as this is not identified as a certified document? If not, why not?”:</p> <p>NCC can confirm that the ‘heritage buffer zone’ is in Lincolnshire and does not affect Nottinghamshire/Bassetlaw. However, NCC do consider if the Burton Wood redline excluded area could be extended to take in A14 (the Heritage Buffer Zone).</p>	<p>The Heritage Setting Buffer located between Gate Burton Hall and Burton Wood has been agreed in consultation with Historic England and therefore cannot be removed.</p>
3. Human Health and Wellbeing			
REP2-057 (WLDC)	1.8.4	<p>Re: whether LPAs are content with the study area for human health and wellbeing effects.</p> <p>WLDC can confirm they are satisfied with the study area for Human Health and well-being effects insofar as they relate to the Gate Burton scheme in solus.</p> <p>The wider implications of the Gate Burton scheme cumulatively with other projects that may occur over a wider areas are not fully understood.</p>	<p>It is welcomed that WLDC are satisfied with the study area for Human Health and Well-being effects.</p> <p>In terms of the other topics included within the ES, please refer to Chapter 16: Cumulative Effects and Interactions of the ES [APP-025/3.1].</p>
REP2-047 (Bassetlaw DC)	1.8.4	<p>Re: whether LPAs are content with the study area for human health and wellbeing effects.</p> <p>For the immediate effects of the proposal, the study area is accurate, although if this also factors-in traffic movements to / from the A57, it may be sensible to also add Tuxford Ward, through which the principal route to the A57 passes.</p>	<p>The study area for Human Health is based on the extent and characteristics of the Scheme and the communities/wards directly and indirectly affected by the Scheme as set out in Chapter 14 of the Environmental Statement [APP-023/3.1]. Where other topics consider effects on routes which are beyond this area, their reported findings are considered in the assessment of Human Health effects. As such whilst the baseline profile for human health does not specifically cover Tuxford Ward, the assessment has considered the possibility for effects to arise in this location for the relevant health determinants that apply</p>
REP2-066 (UK Health)	1.8.6	<p><i>Electro-magnetic Fields:</i></p>	<p>The potential harmful effects of electric and magnetic fields (EMFs) on health is an area that has been extensively researched for over four decades with many thousands of papers published on the issue. This</p>

Response Reference	Question Number	Summary	Applicant response
Security Agency)		<p><i>In response to ExA's Written Questions: Q1.8.6 (page 38 of the ExQ1 document). "Are the relevant Local Authorities and Health Authorities satisfied that the Applicant suggests EMF impacts have been scoped out given the justification at paragraph 14.8.2 of the ES? If not please explain the basis of your concerns?"</i></p> <p><i>UKHSA Response For the 400kV underground cable, the applicant states in Chapter 14.8.2 of the Environmental Statement that "The EMF reduces rapidly with distance, and a maximum 4% of the permitted levels at 5 metres will be experienced".</i></p> <p><i>It is not clear how this conclusion is reached and, therefore, the UKHSA would like to see a clear explanation of the methodology and calculations employed for assessing compliance with exposure guidelines, as set out in the following Code of Practice (see page 5 for detailed requirements): 2 "Power Lines: Demonstrating compliance with EMF public exposure guidelines A voluntary Code of Practice":</i> https://www.emfs.info/wpcontent/uploads/2014/07/PowerlinesDemonstratingcomplianceVCoP2012resaved.pdf</p>	<p>research has not established <u>any</u> health effects at levels below the national guidelines which have been applied to the development of this Scheme. These national guidelines and standards have been developed considering the body of scientific research which is reviewed by independent authoritative scientific organisations such as the World Health Organisation (WHO).</p> <p>The 400kV grid connection cable is proposed to be underground. Therefore, the potential sources of EMF that might act in-combination with other sources are removed.</p> <p>Chapter 14 of the Environmental Statement [APP-023/3.1] provides a brief statement on this assessment. It states that the nearest residential receptors to cables would be 10m. This would allow construction vehicles and laydown at the boundary but the cable centreline will be a minimum of 10m from any residential properties. This distance will be secured through text in the Outline Design Principles submitted at Deadline 4.</p> <p>Burying is 'mitigation' as far as possible, as research available by NGET shows that the EMF is noticeably higher from OHLs than buried cables. The buried cables also remove any electric field.</p> <p>The National Grid document 'Undergrounding high voltage electricity transmission lines' states that for a 400kV cable buried at 0.9m depth, the typical magnetic field is 24 microteslas when on top of the cable, 3 microteslas at 5m from the centreline, and 0.9 microteslas at 10m the centreline, with the maximum known by National Grid being 96 microteslas on top of the cable, 13 microteslas at 5m, and 3.6 microteslas at 10m.</p> <p>The Energy Networks Associate publication 'Electric and Magnetic Fields' states: "The Government sets guidelines for exposure to EMFs in the UK on advice from the Health Protection Agency (HPA). In March 2004 the UK</p>

Response Reference	Question Number	Summary	Applicant response
			<p>adopted the 1998 guidelines published by the International Commission on Non-Ionizing Radiation Protection (ICNIRP) and this policy was reaffirmed by a Written Ministerial Statement in October 2009. These guidelines also form the basis of a European Union Recommendation on public exposure and a Directive on occupational exposure. The ICNIRP 'reference levels' for the public are: 100 microteslas for magnetic fields". It goes on to say: "These are the levels above which more investigation is needed if this level of exposure is likely to occur; the permitted levels of exposure are somewhat higher, 360 microteslas and 9000 volts per metre. They apply where the time of exposure is significant. These guidelines are designed to ensure that EMFs do not interfere with nerves, but were set after examining all the evidence, including the evidence on cancer. The occupational limits are five times higher".</p> <p>The reference levels are not in themselves limits but provide guidance for assessing compliance with the basic restrictions and reducing the risk of indirect effects. The reference level is the level above which more assessment is required if this level of exposure is likely to occur; the permitted levels of exposure (basic restrictions) are somewhat higher as noted above, 360µT. The reference levels apply where the time of exposure is significant, for instance in a residence (as noted in the Energy Networks Association publication 'Electric and Magnetic Fields') and ICNIRP guidelines.</p> <p>On this basis, the level of exposure for a 400kv cable buried at 0.9m depth in % terms of the more robust reference level would be 96% if under the property, 4% at 5m from the centreline and 1.0% at 10m from the centreline.</p> <p>For permanent residents, given the minimum 10m distance from the centreline to properties, and taking into account this evidence and the UK limits set for safety of members of the public, the maximum reported EMF for high voltage cables buried at 0.9m would comply with the ICNIRP even if they were directly under the property.</p>

Response Reference	Question Number	Summary	Applicant response
			<p>For individuals using the public rights of way who are exposed to EMF from the buried cables for only short periods of time, the exposure is similar to the EMF associated with general household appliances (and noticeably less than associated with the exposure when using a vacuum cleaner).</p> <p>As the Applicant has ensured that all of the proposed cables comply with the policies set by Government on the advice of their independent advisors, this ensures that health concerns are properly and adequately addressed. It is on this basis that it can be confirmed that the Scheme would have no significant adverse impact in respect of human health arising from EMF.</p>
9. Landscape and Visual			
REP2-047	1.9.3	<p>Good Design</p> <p>In response to ExA's question 1.9.3 regarding the use/need for a design champion in line with the National Infrastructure Strategy 2020 (which states "all infrastructure projects to have a board level Design Champion in place by the end of 2021 at either the project, programme or organisational level, supported ... by design panels" (please refer to detail in question):</p> <p>We support the principle to have a Design Champion in place supported by a design panel to ensure that the project is informed by good quality sustainable design principles and so that the project is appropriately integrated into the landscape.</p> <p>All neighbourhood plans in the impacted area address design as a key consideration, all including design codes, hence it will be important for this to be given due consideration as part of the proposals.</p>	<p>Comment noted. The Applicant has always had a lead on design for the project and a Design Champion would be identified from within the team for the detailed design. The detailed design would be submitted for approval under Requirement 5 to the relevant planning authorities, who would also input. No additional requirements or wording is considered necessary for the design process to proceed and no design panel is considered necessary by the Applicant.</p>



Response Reference	Question Number	Summary	Applicant response
REP2-049 (LCC)	1.9.3	<p>Good Design</p> <p>In response to ExA's question 1.9.3 regarding the use/need for a design champion in line with the National Infrastructure Strategy 2020 (which states "all infrastructure projects to have a board level Design Champion in place by the end of 2021 at either the project, programme or organisational level, supported ... by design panels" (please refer to detail in question).</p> <p>1. We would support the measures outlined. It is important at the detailed design stages that the design principles utilised within the application, particularly in regards to the layout and appearance, mitigation areas and planting, are carried through into the next stage and not lost or diluted. Any significant deviations from the design information utilised, such as landscape mitigation or location of large elements such as sub stations, may bring about more adverse, and potentially significant, effects that currently assessed, particularly in regards to landscape and visual matters. An approved Design Code/Guide would assist with this, which would be guided by a Design Champion or panel who may be able to act in an "intelligent customer" function or as an "intelligent client". For example, while the submission includes landscape proposals (Figure 10-23 Outline Landscape Masterplan – 6 sheets), these are of a high level and would expect much more detailed plans to be submitted at the detailed design stage to satisfy requirements. This would include the types of planting (species), as well as number, density and specification of planting. The types and areas of planting would be initially indicated within an approved design code or guide, and the champion or panel would be able to guide the detailed implementation of this through to detailed design information.</p> <p>2. A multi-skilled professional that is able to play a significant role in the design of new infrastructure projects would be appropriate for a Design Champion, ideally with experience in solar, particularly at a large scale. The role needs to have an overarching view, combining and integrating different disciplines to ensure multi-functional spaces (e.g. greenspace that resolves landscape/visual, ecological and drainage matters) and not be too focussed on specific technical matters of solar equipment. They should understand the context to good design and place making and be a resource for the design team.</p>	<p>The Applicant intends to discuss this response with LCC and will report on any agreement in the next iteration of the Statement of Common Ground with LCC.</p>


Response Reference	Question Number	Summary	Applicant response
		<p>4. Once detailed designs have been developed, they may be endorsed by the Design Champion or Design Panel and subsequently agreed and approved with the relevant authorities in regards to suitability and adherence to the Design Guide.</p> <p>5. This would assist in the process, and ensure a joined-up and consistent approach across multiple authority boundaries. LCC Highways do not see this as a real benefit, each Authority has different S278 processes. Proposals for highways will usually be to national DMRB standards, so no need to create new design principles for highways.</p>	
REP2-057 (WLDC)	1.9.3	<p>Good Design</p> <p>In response to ExA's question 1.9.3 regarding the use/need for a design champion in line with the National Infrastructure Strategy 2020 (which states "all infrastructure projects to have a board level Design Champion in place by the end of 2021 at either the project, programme or organisational level, supported ... by design panels" (please refer to detail in question).</p> <p>WLDC recognise and support the requirement for a 'Design Champion' advocated by The National Infrastructure Strategy. The value of such a role is to establish good design principles and objectives at the start of an infrastructure project to ensure that they are embedded its evolution. With regard to approach adopted by the Gate Burton scheme, WLDC adopts a neutral position in its views for the reasons explained in response to the questions below. WLDC recognise the NIS requirements and how these can aid the development of well-designed projects. Embedding design principles and objectives at an early stage in a project can help guide a scheme to minimise its environmental effects. The approach also has significant value during pre-application consultation in informing stakeholder of the design principles in a transparent manner.</p> <p>As the purpose of the NIS requirements is to inform a project from the outset, WLDC considers that the omission of this approach would make it extremely challenging to apply it retrospectively to inform secondary approvals. Much of the value will have been lost, as the Gate Burton scheme has progressed to this examination stage based upon the design approaches applied by the developer. The scope of the DCO, if granted, would be framed around these principles and proposed parameters. As a consequence, the post-consent approvals should not be revisiting the design approach and parameters; it is there to ratify further details at a stage where it is more feasible for the developer to confirm them.</p>	<p>The Applicant intends to discuss this response with LCC and will report on any agreement in the next iteration of the Statement of Common Ground with WLDC.</p>

Response Reference	Question Number	Summary	Applicant response
		<p>WLDC's position is that the determination of the DCO should be based on the approach and information provided at this stage. If such matters are deemed unacceptable by the Secretary State, then the application should be refused. Attempts to remedy an unacceptable position by seeking to apply a higher level of design requirements through Requirements would not be appropriate.</p> <p><u>Design champion:</u> WLDC questions the value in the introduction of a Design Champion at this stage. The application has been assessed and works plans derived from a set of design principles and parameters. The determination of the DCO must be based upon whether the design is acceptable or unacceptable at this stage. The consideration of Requirements will be based upon the EIA, the scope of other application documents, the management plans and works plans. Secondary consents through Requirements should be based upon the scope of the application consented and is not an opportunity to impose added information or ideas. Whilst WLDC would support a design champion role, it questions the impact such an approach would have at this stage.</p> <p><u>Design review panel:</u> WLDC would support this approach, however this would again require embedding into the project at an early stage in order to realise it's full effectiveness. Design code WLDC would support this approach, however such codes should be in place at the start of the project and be subject to non-statutory and statutory consultation. As above, WLDC questions how effective this approach would be at this stage and what the design coding criteria/metric would comprise.</p> <p><u>Outline, including timeline, of the proposed design process:</u> As stated above, the scope for design change post-consent will be limited. Obliging the applicant to consult widely on design principles that have effectively been approved through the grant of a DCO would have limited influence on the final design.</p> <p>1. What qualifications and experience should the Design Champion have? 'Design' in the context of infrastructure development can be far reaching and encompassing various technical impacts. WLDC considers that it is unlikely that there is a</p>	

Response Reference	Question Number	Summary	Applicant response
		<p>suitable person to advice on all aspects of a project's design. Minimising impacts can relate to technical engineering design (e.g. the parameters of equipment/plant, the areas required for compounds) across to ecological mitigation measures.</p> <p>2. How might the above measures be secured? Should the measures be deemed necessary, WLDC considers that delivery through a DCO Requirements would be an appropriate mechanism.</p> <p>3. Are any further measures needed? WLDC do not identify any further measures.</p> <p>4. In the opinion of the Local Authorities and other statutory parties, would the implementation of any or all of the above measures assist in determining post - consent approvals (including the discharge of requirements) in relation to achieving good design? WLDC questions the effectiveness of the proposed measure s in assisting post -consent approvals at this stage. As stated above, the purpose of a 'Design Champion' is to inform the projects evolution from the outset in an iterative manner. Imposing this approach solely for the purpose of post -consent approval is likely to have limited impact on the final implemented design.</p> <p>This would be due to the design principles and parameters having been considered at the DCO decision stage, and the EIA providing the scope within which the final design should sit within.</p> <p>Furthermore, as drafted, the DCO imposes only 6 weeks on the LPAs to determine DCO Requirements (Schedule 16). This time period would be wholly inadequate to allow the consideration of submitted details by a design panel.</p> <p>Should the Secretary of State consider the design of the project to be unacceptable or consider that the design could be improved to minimise effects further, the view of WLDC is that application should be refused.</p>	
REP2-049 (LCC)	1.9.11	<p>Zone of theoretical visibility and viewpoints:</p> <p>The process of modelling Zones of Theoretical Visibility (ZTVs) is presented within section 10.9 of Appendix 10-B. However, it is not explicit in the methodology to what parameters the proposals have been modelled to. Section 10.4.4 of the LVIA chapter identifies that photomontages have been presented to the maximum allowed parameter heights, therefore it has been assumed that the ZTV is generated upon the maximum</p>	<p>Zone of Theoretical Visibility Parameters ZTV Figures 10-09A to 10-10C [APP-068/3.2 to APP-073/3.2] as well as Figures 10-13 to 10-15 [APP-076/3.2 to APP-078/3.2] include a note beneath the legend, which outlines what baseline information and parameters were used to produce the ZTVs. For example, for Figure 10-10A [APP-071/3.2] it states the following: "1) <i>Zone of Theoretical Visibility (ZTV) has been generated using Environment Agency digital terrain</i></p>

Response Reference	Question Number	Summary	Applicant response
		<p>parameters provided within Chapter 2: The Scheme, Document Reference: EN010131/APP/3.1, as this would provide a 'worst case' ZTV, however this needs to be clarified.</p> <p>Following fieldwork, utilising the information presented within the ZTVs: "Visual receptors likely to experience views of the construction, operation or decommissioning of the Scheme were identified through interrogation of the ZTVs and fieldwork". Viewpoints were subsequently selected to represent views from these receptors. The selection of viewpoints formed part of the pre-application consultation and includes locations recommended as part of this process.</p> <p>Table 10-5 clearly lays out the identified receptor groups (e.g. residents) and subsequent associated representative viewpoints. Table 10-6 then goes on to clearly summarise the value of the view, susceptibility to change, and resultant sensitivity of each receptor and subsequently each representative viewpoint.</p> <p>Viewpoints representative of the identified visual receptors are identified. These were discussed and agreed upon through consultation. The baseline process resulted in identifying 38 viewpoints, including cumulative viewpoints, to represent the views of the visual receptors. Figures 10-16 to 10-18 illustrate these views.</p> <p>The following viewpoints (presented on Figures 10-16 to 10-18) are recommended to be reviewed as the assessment presented within the LVIA potentially underplays the Magnitude of visual effect, and subsequently Significance of effect:</p> <ul style="list-style-type: none"> · Viewpoint 1: The development is a prominent part of the view, and while mitigation planting to the right of the view provides screening, panels are conspicuous to the centre of the view. The screening of half the panels is unlikely to drop the magnitude of effect from High (at year 1) to Medium (year 15). · Viewpoint 4: The magnitude of effect is highly dependent upon the establishment of advanced planting. The height of new planting up to 3m seems unlikely with an assumed two to three years growth prior to construction starting or operation year 1. 	<p><i>model which takes into account the screening effects of vegetation. Woodland from the Forestry Commission National Forestry Inventory (2021), with an assumed height of 10m have been incorporated into the DTM, to mask any 'false' visibility from the top of trees. 2) ZTV based upon points of the Solar Panel Areas at 3.5m height, the Substation at a 13m height and BESS at 4.5m, with an observer height of 1.5m".</i></p> <p>Representative Viewpoints and proposed mitigation planting</p> <p><u>Viewpoint 1:</u> Viewpoint 1 is located within the Order limits. The assessment acknowledges that the Scheme will result in a pronounced change in the view, which leads to a high visual magnitude at Year 1 without established landscape mitigation planting. The proposed screen planting will reduce the open visibility of solar panels. Panels on the left side will remain visible as a decision was taken to retain the middle distance view of Long Nursery woodland. However, the proposed screen planting will reduce visual effects to some extent, which led to a reduction of the magnitude of visual effects to medium at Year 15.</p> <p><u>Viewpoints 4, 10-1, 18:</u> The Outline Landscape and Ecology Management Plan (OLEMP) [APP-231/7.10 and as amended] provides information on the species mix and planting heights, as well as maintenance recommendations for new hedgerow plants, trees and shrubs. Advanced Planting along Willingham Road and Marton Road utilises a considerable amount of existing hedgerows, which will be let to grow taller and which will be maintained at a higher height. However, strengthening and filling-in of gaps in those existing hedgerows will be undertaken as well as sections of new planting including along Kexby Lane / B1241 and Upton Road. The height of the proposed screen planting in areas of advanced planting will be reviewed and increased if required prior to the planting season in order to ensure the envisaged screening effects will be achieved following the completion of construction works.</p> <p><u>Viewpoint 13:</u></p>

Response Reference	Question Number	Summary	Applicant response
		<ul style="list-style-type: none"> · Viewpoint 10-1: The magnitude of effect is highly dependent upon the establishment of advanced planting. The height of new planting up to 3m seems unlikely with an assumed two to three years growth prior to construction starting or operation year 1. · Viewpoint 13: The view shows complete vegetation removal along the A156 and introduction of an access into the Development opening up views of the foreground and midground. This is a large change in view from a local rural road. It is unclear as to why effects would reduce after construction. · Viewpoint 16: Development is only visible to peripheries of the image – view would have benefitted from rotating to the right or addition of an extra sheet to illustrate extent of views of Development as it is not clear if these are extensive to the right of view. · Viewpoint 18: The magnitude of effect is highly dependent upon the establishment of advanced planting. The height of new planting up to 3.5m seems unlikely, with an assumed two to three years growth prior to construction starting or operation year 1. Vegetation growth/hedgerow management would screen views of panels, however at year 15 would shorten views which currently are across open landscape. · Viewpoint LCC VP02: The view is closer to the Site than that agreed at the pre-application stage. If the view was further back from the Site, more of the development would be evident through the open boundary, and potentially effects likely be assessed as greater. The Image below is what was presented and discussed at meeting held on 10/11/2022 which would provide a clearer view:  <ul style="list-style-type: none"> · Viewpoint LCC VP08: The view of the Development would likely be clearer further west along PROW KNAI/44/2. Image of photography was not available at the meeting held with AECOM on 10/11/2022, and therefore was not able to be agreed. 	<p>The viewpoint is located at the A156 / Gainsborough Road, which is a main artery road leading to Gainsborough further north. Visual effects reduce after construction as the construction compound would be visible in this view during the construction phase but not at operation. The visual impact assessment takes account of this fact and states a higher visual impact at construction than operation although both remain significant.</p> <p><u>Viewpoint 16:</u> This viewpoint is located at a gap of vegetation along Clay Lane, which is otherwise flanked to either side by tall trees and hedgerows / undergrowth in this section obstructing views of the Scheme. The viewpoint captures sections of the open view as well the otherwise dense roadside vegetation, which is important to show in order to understand this viewpoint location properly. This has also been described and fully taken into account in the baseline description and the determination of the magnitude of visual effects included in ES Appendix 10-E Visual Baseline [APP-148/3.3] and ES Appendix 10-F Visual Assessment [APP-149/3.3].</p> <p>Viewpoint LCC VP02: It is correct that the image presented by LCC below shows more context of the overall viewpoint setting. The solar arrays will be located to the right of the trees in the centre-right, so the majority of this view shows a field where no solar arrays would be placed.</p> 

Response Reference	Question Number	Summary	Applicant response
			<p>Therefore, the decision was taken to adjust the focus more on the field containing the solar arrays as shown in the ES photomontage below (refer to LCC VP02 included in Figure 10-18 [APP-087/3.2]. The visual effects will be similar in either view (LCC Image and ES Photomontage). The photomontage photography has also been taken with a 50mm lens, which narrows the focus similar to the focus of a human eye.</p>  <p>Viewpoint LCC VP08: Viewpoint LCC VP08 illustrates the overall setting of the solar farm. Sections 10.7 and 10.9 in ES Chapter 10: Landscape and Visual Amenity [APP -019/3.1] state that recreational users of PRoW LL Knai 44/2 will experience close views of solar panels to one side (Section 10.7). It assesses the visual effects of the Scheme at Construction, Year 1, Year 15 and Decommissioning (Section 10.9). It acknowledges that open visibility of solar panels will be available for approximately 360m resulting in significant visual effects.</p>
REP2-049 (LCC)	1.9.12	<p>Re: Assessment of Likely Significant Effects (whether any of the area constitutes a 'valued landscape'):</p> <p>The locally designated Area of Great Landscape Value (AGLV), within the western section of the Site, has not been identified as a receptor in its own right within the baseline. However, the AGLV within the Site is acknowledged within the LVIA, having been taken into account when defining the value of character areas within the assessment. This is</p>	<p>Impact of AGLVs</p> <p>As set out in ES Chapter 3: Alternatives and Design Evolution [APP-012/3.1] Areas of Great Landscape Value identified in the then Draft Central Lincolnshire Local Plan were identified but not excluded from development. The degree of conflict that a solar development would have with the policies associated with these designations depends on the extent of landscape and visual impacts, which in turn could be influenced by good site layout and design. Further, whilst local landscape</p>

Response Reference	Question Number	Summary	Applicant response
		<p>clarified in paragraph of the LVIA, which states: “The effect of the Scheme on the ALGV have been considered in this assessment by taking the designation into account when defining the value of landscape character areas and views of the designated landscape.”</p> <p>Appendix 10-C: Landscape Baseline, and Appendix 10-D: Landscape Assessment do identify that several landscape character areas (e.g. Trent Valley LCA, Gate Burton Estate, and Ancient Woodland Ridge) contain the AGLV, and imply this has been an attributing factor to assessing the value of these landscape receptors. However, the value and susceptibility of the AGLV has not been assessed in its own right and it is unclear how the assessment has judged the value and susceptibility of the AGLV, which the LVIA at paragraph 10.9.15, states as being of medium value and susceptibility, and subsequently medium sensitivity.</p> <p>We would expect this local AGLV designation would increase the value and susceptibility of landscape character within these areas, and it is not clear or transparent within the LVIA baseline if this has been fully identified and considered.</p> <p>At a local level, Local Landscape Character Area 01: Gate Burton Estate and LLCA 02 Ancient Woodland Ridge are located within the AGLV and have subsequently been identified as being, respectively, of a high and medium value, susceptibility and sensitivity. This is an acknowledgement of this part of the Site and Study Area contribute to the value of this landscape through increased vegetation cover, structure and condition. These are valued landscapes, and it is evident on Site that these areas have different characteristics and features of value, are more susceptible to change, and subsequently are more sensitive than other areas to the east of the railway line.</p> <p>Sections 10.9.14 and 10.9.15 (Construction), and 10.9.56 and 10.9.57 (Operation) of the LVIA do assess the level of effects on the AGLV which are assessed as minor adverse.</p>	<p>designations should be paid particular attention, NPS EN-1 paragraph 5.9.14 states that <i>‘local landscape designations should not be used in themselves to refuse consent, as this may unduly restrict acceptable development’</i>. Paragraph 5.9.15-16 go on to say that when determining DCO applications decision makers should <i>‘judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project.’</i> Given that development of NSIPs in local landscape designations can be acceptable and justified, these areas were not excluded. In assessing the suitability of the Gate Burton Site, the Applicant paid particular attention to the design and layout of this area to reduce the impact on the designated area, and landscape and visual impacts overall.</p> <p>AGLV Designation</p> <p>Information regarding the designation of the AGLV within West Lindsey has been difficult to obtain, and an evidence base for the designation is not available. If this was able to be obtained from West Lindsey District Council (WLDC) this would have assisted the assessment process to understand what are the elements / key characteristics that make up the ‘distinctive value’, particularly when the Policies Map for the Central Lincolnshire Local Plan 2023 shows a number of independent AGLV’s at various locations across Lincolnshire.</p> <p>In the absence of this information, the Applicant created a number of local landscape character areas (LLCA), which provide relevant localised key characteristics in order to assess landscape effects of the Scheme. These LLCA’s include sections of the AGLV south of Gainsborough, which have been assessed in terms of landscape effects in ES Volume 1, Chapter 10: Landscape and Visual Amenity [APP-019/3.1 and subsequent version]. This includes a landscape assessment of the AGLV in its own right at construction and operation. This determined that landscape effects on the key characteristics (as identified by the applicant) of the AGLV within the study area, which are <i>“predominantly small size and medium deciduous woodlands scattered across the area including some ancient woodland and semi-natural woodland which increases the</i></p>

Response Reference	Question Number	Summary	Applicant response
			<p><i>diversity of the predominantly arable landscape</i>" as described in ES Appendix 10-C Landscape Baseline [APP-146/3.3], are minor adverse as those key characteristics will not be affected by the Scheme.</p> <p>The separate AGLV further east, which includes Lincoln Cliff, will not be affected by the Scheme as it will not be discernible as illustrated in Photomontage 7 included in Figure 10-16 Photosheets 1-23 Compressed [APP-079 to -082/3.2], and Photomontages C4 and C5 included in Figure 10-17 Photosheets Cumulative C1-C5 Compressed [APP-083 to -086/3.2].</p>
REP2-057 (WLDC)	1.9.12	<p>Re: Assessment of Likely Significant Effects (whether any of the area constitutes a 'valued landscape'):</p> <p>WLDC contend strongly that the Area of Great Landscape Value (AGLV) is of significant value and must be considered as a 'valued landscape' in the determination of the application.</p> <p>WLDC has provided detailed reasons behind its objection to the impact of the scheme on the AGLV within the Local Impact Report (REP-053) and Written Representation. To avoid duplication verbatim, the reasons are summarised below.</p> <p>The AGLV is protected by Policy S62 in the adopted Central Lincolnshire Local Plan, which comprises the statutory development plan for the West Lindsey District and must be given significant weight as an 'important and relevant' matter as part of the determination of the application under section 105 of the Planning Act 2008. The Local Plan was adopted as recently as April 2023, and thus the purpose and importance of policy S53 has been confirmed and remains a key policy.</p> <p>The applicant recognised the AGLV as a constraint in the early stages of its site selection process, however it has continued to promote a project that has direct negative impacts upon it (circa. 9.92% of the AGLV is located within the Order Limits). These impacts and the decision that such harm is acceptable has not been adequately assessed or justified by the applicant.</p>	<p>The Applicant recognises that the landscape in the area is valued by the community and that this has been expressed through written submissions by host authorities and local people as well as at the two Open Floor Hearings. However, the Applicant disagrees that the landscape in which the Gate Burton Energy Park is located is a 'valued landscape' in NPPF terms, despite the AGLV covering part of the area. A full rationale of why the Applicant has come to this view is provided in document [8.16] submitted at Deadline 3.</p> <p>The Applicant agrees that the Central Lincolnshire Local Plan is an important and relevant matter in decision making and has considered it as such in the Planning, Design and Access Statement. The Planning, Design and Access Statement was updated at Deadline 2 to take account of the adoption of the Local Plan (see [REP2-004 and REP2-006]).</p> <p>As set out in ES Chapter 3: Alternatives and Design Evolution [APP-012/3.1] Areas of Great Landscape Value identified in the Draft Central Lincolnshire Local Plan were identified but not excluded from development. The degree of conflict that a solar development would have with the policies associated with these designations depends on the extent of landscape and visual impacts, which in turn could be influenced by good site layout and design. Further, whilst local landscape designations should be paid particular attention, NPS EN-1 paragraph 5.9.14 states that <i>'local landscape designations should not be used in</i></p>

Response Reference	Question Number	Summary	Applicant response
		<p>Whilst paragraph 5.9.14 of NPS EN-1 states that local landscape designation should not be used in themselves to refuse consent, WLDC's position is that the Gate Burton scheme is unable to draw benefit from this policy, due to solar development being a technology to which NPS EN-1 applies. As a consequence, local landscape designations remain a high sensitivity for solar farm development and paragraph 5.9.14 cannot be used to circumvent proper assessment and significant weight given to the harm projects cause to valued local landscapes such as the AGLV protected by statutory policy S62.</p> <p>WLDC maintains a strong objection to the proposal due to its failure to accord with statutory policy S62.</p>	<p><i>themselves to refuse consent, as this may unduly restrict acceptable development'. Paragraph 5.9.15-16 go on to say that when determining DCO applications decision makers should 'judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project.'</i> Given that development of NSIPs in local landscape designations can be acceptable and justified, these areas were not excluded. In assessing the suitability of the Gate Burton Site, the Applicant paid particular attention to the design and layout of this area to reduce the impact on the designated area, and landscape and visual impacts overall.</p> <p>AGLV Designation</p> <p>Information regarding the designation of the AGLV within West Lindsey has been difficult to obtain, and an evidence base for the designation is not available. If this was able to be obtained from West Lindsey District Council (WLDC) this would have assisted the assessment process to understand what are the elements / key characteristics that make up the 'distinctive value', particularly when the Policies Map for the Central Lincolnshire Local Plan 2023 shows a number of independent AGLVs at various locations across Lincolnshire that are all covered by the same policy text.</p> <p>In the absence of this information, the Applicant created a number of local landscape character areas (LLCA), which provide relevant localised key characteristics in order to assess landscape effects of the Scheme. These LLCA's include sections of the AGLV south of Gainsborough, which have been assessed in terms of landscape effects in ES Volume 1, Chapter 10: Landscape and Visual Amenity [APP-019/3.1]. This includes a landscape assessment of the AGLV in its own right at construction and operation. This determined that landscape effects on the key characteristics (as identified by the Applicant) of the AGLV within the study area, which are "<i>predominantly small size and medium deciduous woodlands scattered across the area including some ancient woodland and semi-natural woodland which increases the diversity of the</i></p>

Response Reference	Question Number	Summary	Applicant response
			<p><i>predominantly arable landscape</i>” as described in ES Appendix 10-C Landscape Baseline [APP-146/3.3], are minor adverse as those key characteristics will not be affected by the Scheme. This impact is not significant in EIA terms.</p> <p>The separate AGLV further east, which includes Lincoln Cliff, will not be affected by the Scheme as it will not be discernible as illustrated in Photomontage 7 included in Figure 10-16 Photosheets 1-23 Compressed [APP-079 to -082/3.2], and Photomontages C4 and C5 included in Figure 10-17 Photosheets Cumulative C1-C5 Compressed [APP-083 to -086/3.2]. It should be noted that in the Applicant’s experience, the local community has focused on the value of this more distant AGLV, which has a different character as a ridge, rather than the AGLV in which the Gate Burton Energy Park is situated.</p> <p>WLDC states that the Applicant cannot ‘draw benefit’ from policies in NPS EN-1 because it did not mention solar development. The Applicant disagrees. NPS EN-1 is dated and did not conceive of solar projects exceeding 50MW, but was written to guide decision-making on large scale renewable energy schemes and consequently is a relevant and important matter when taking a decision on a large scale renewable energy scheme.</p> <p>Further the wording in the Revised Draft NPS EN-1 published in March 2023 is very similar to that in NPS EN-1, with the latest draft stating in paragraph 5.10.11 that:</p> <p><i>‘Outside nationally designated areas, there are local landscapes that may be highly valued locally. Where a local development document in England or a local development plan in Wales has policies based on landscape or waterscape character assessment, these should be paid particular attention. However, locally valued landscapes should not be used in</i></p>

Response Reference	Question Number	Summary	Applicant response
			<p><i>themselves to refuse consent, as this may unduly restrict acceptable development.'</i></p> <p><i>And at 5.10.34 that 'The Secretary of State should judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project'.</i></p> <p>Revised Draft NPS EN-1 was written to guide decision making on solar NSIPs, has been recently published and is at an advanced stage so should have significant weight as a relevant and important consideration in decision making. The fact that the policy text on local landscapes in the 2023 draft is very similar to that in the designated NPS EN-1 from 2011 shows both that the Government considers that this text also applies to solar development and significant continuity of approach over time. This increases the weight that can be given to the policy in the designated NPS EN-1.</p> <p>The principle that the designated and draft NPS EN-1 and NPS EN-3 are relevant and important matters when taking decisions on solar NSIPs has been established in recent decisions by the Secretary of State. For example, this principle is stated in paragraph 4.2 of the Secretary of State's Decision Letter on the Longfield Solar Farm published on 26 June 2023.</p>
REP2-049 (LCC)	1.9.15	<p>Cumulative Effects Assessment (and whether LCC happy with the short list of projects included within the assessment for ES Chapter 10 Landscape and Visual Amenity):</p> <p>Yes, the projects listed are appropriate. Schemes that are considered for the cumulative assessment are identified within Chapter 16: Cumulative effects. The identified schemes relevant to potential cumulative Landscape and Visual Amenity effects are identified within Chapter 16, and these are: Cottam Power Station Redevelopment, Tillbridge Solar Project, Cottam Solar Project and West Burton Solar Project. These schemes have been assessed cumulatively with the Development, both individually (with Gate Burton Solar Project) and all together, which is appropriate to understand how the local area may</p>	<p>The Applicant appreciates the clear agreement on cumulative schemes and the dialogue that has ensured the right developments are captured.</p> <p>Cumulative Impact – Landscape</p> <p>Cumulative visual effects of the Scheme in conjunction with Cottam, West Burton and Tillbridge Solar Farms were assessed as being minor to negligible and not significant.</p>

Response Reference	Question Number	Summary	Applicant response
		<p>potentially change through the development of large scale solar over an extensive area. The cumulative effects of the Development will bring about significant landscape and visual effects, particularly when assessed alongside the proposed Cottam, West Burton and Tillbridge Solar schemes. The mass and scale of these projects combined would lead to adverse effects on landscape character and visual amenity over an extensive area. The landscape character of the local, and potentially regional area, may be completely altered, particularly when experienced sequentially while travelling through the landscape.</p>	<p>Whilst significant landscape cumulative effects are limited to moderate adverse landscape effects with Cottam, West Burton and Tillbridge, the Applicant and other developers have continued to work collaboratively in a number of areas to respond to continued dialogue with Lincolnshire County Council and in response to relevant representations and written questions received. This work includes efforts to reduce the extent of visibility splay and associated vegetation removal (as set out in further detail in the Access Updates and Cumulative Impact Assessment [8.10] Technical Note also submitted at Deadline 2). This has reduced the removal of vegetation and semi mature trees for the access points compared to the design presented and assessed in the ES. There has therefore been continued work in relation to the planning and management of effects within the shared Grid Connection Corridor. This will continue and include working collaboratively to further minimise total area of hedgerows to be removed. Further information is provided within the Interrelationships Report [REP-033/-8.2] submitted at Deadline 1 and future iterations to be submitted to the Examination.</p> <p>The Applicant disagrees that the landscape character of the local or regional area will be 'completely altered' by the Scheme individually or when considered alongside the other three solar NSIPs in the area. This includes when considering the sequential impact of schemes experienced while travelling through the landscape.</p>
REP2-049 (LCC)	1.9.19	<p>Monitoring Mitigation Measures in the OLEMP:</p> <p>The maintenance operations provide an initial overview of operations; however, we would expect the management plan be developed further and also last well beyond the initial 5 year period, particularly if landscape and visual effects are being assessed at 15 years: the reduction in landscape and visual effects presented in the LVIA are based on the success of landscape mitigation. Similarly, any early planting should be secured and implemented at the earliest opportunity as effects are also reduced in the LVIA based upon the assumption these are in place and have established as planned. Monitoring of the proposals, as outlined in section 4 of the OLEMP, is a key aspect of the mitigation plan and is something which needs further development to ensure there is robustness to deal with the challenging climatic conditions when it comes to establishing new plantings.</p>	<p>The Applicant will discuss this response with LCC and report any agreements in the next iteration of the Statement of Common Ground.</p>

Response Reference	Question Number	Summary	Applicant response
		<p>The regular updating of the management plan will go some way to ensuring that is kept valid and can respond to issues and trends effectively. The updating every 5 years following the initial establishment period will also ensure that the management plan can adapt to varying conditions. However, the monitoring is only beneficial if the management operations respond to the findings, and the implementation of any recommendations made need to be funded and secured throughout the 60 year period. It is also unclear as to who will be monitoring, and subsequently agreeing the changing management plan and subsequent operations. This would be more suitable if undertaken as an independent role.</p>	
11. Noise			
<p>REP2-057 (WLDC)</p>	<p>1.11.2</p>	<p>Re Noise and Vibration Assessment and whether LPAs agree with methodology and conclusions in ES Chapter 11.</p> <p>WLDC set out its concerns regarding noise and vibration in its submitted Local Impact Report (REP-053). The construction phase assessments are generally considered to be acceptable, however, clarifications are required on the following points:</p> <ul style="list-style-type: none"> • No information is provided in the impact assessment to confirm what the construction noise LOAEL and SOAEL values are for sensitive receptors affected by the grid connection corridor (the cabling route covered by activities NGA4 and NGA5 in the ES); • Calculation assumptions for the construction noise predictions, for example, whether hard or soft ground attenuation is assumed; • It is implied that the construction noise predictions do not include reductions from screening or construction noise barriers as these are not stated as embedded mitigation measures; and • How many or which sensitive receptors would be affected by construction vibration levels exceeding the LOAEL or SOAEL. This information is required to confirm the scale of construction vibration impacts. <p>The operation phase assessment follows the BS 4142 methodology until the rating level is calculated, after which the rating level is compared against sound levels representing the LOAEL and SOAEL. The reasons for this are that the background sound levels measured in the study area are low and that the rating levels from the site are low. The</p>	<p>In response to the bullet points raised regarding the construction noise assessment:</p> <ul style="list-style-type: none"> • Table 11-6 of ES Chapter 11 [APP-020/3.1] presents the LOAEL and SOAEL for construction and decommissioning noise, which includes NGA4 and NGA5. • Ground absorption was set at 0.8 as per the noise modelling methodology set out in ES Appendix 11-D [APP-158/3.3]. • No reductions from screening or barriers are accounted for other than for NGA5, where barriers are included as embedded mitigation in of ES Chapter 11 [APP-020/3.1]. • Vibration generated from vibratory rollers was the only activity that may generate sufficient levels of vibration at nearby receptors. As vibration generated from reinstatement activities would impact sensitive receptors for less than a day, there was not considered any need to identify specific receptors that may be affected. Embedded mitigation measures set out in of ES Chapter 11 [APP-020/3.1] were considered sufficient to control the potential for short-term adverse effects. <p>The LOAEL and SOAEL for operational noise were defined in accordance with guidance in BS 4141:2014+A1:2019 and the Association of Noise Consultants Guide to BS 4142. This allows for consideration of assessing noise effects in environments where background noise levels are very</p>

Response Reference	Question Number	Summary	Applicant response
		<p>operation phase assessment concludes that there are exceedances of the LOAEL (30 dB LAr,T minimum at night) but not the SOAEL (45 dB LAr,T), meaning there are no significant effects. It is agreed that the predicted rating levels are below the SOAEL, however, the context of the local area is not considered. Table 11 -17 shows that the rating level is more than 10 dB above the background sound level at several sensitive receptors (R2, R3, R4, R10, R11, R12, R15, R18 and R19), which cannot be ignored. In a rural area, changes of this magnitude are likely to be perceptible to local residents, who may perceive that the character of the local area is changing. Further information on contextual factors is required to confirm the significance, which may include reference to daytime impacts. It is also noted that the background sound levels presented in Table 11 - 17 are not the lowest values as stated in the table heading, but the average values derived in Appendix 11 -C.</p> <p>Additionally, it is noted that a requirement of BS 4142 assessments is to discuss uncertainty risks when assessing impacts resulting from industrial or commercial sound. No information relating to uncertainty is included in the ES, although it is acknowledged that several assumptions are declared and a sensitivity test for inverters is provided in Appendix 11 -D.</p>	<p>low. In this case, the context of the assessment is that absolute rating noise levels at sensitive receptors are more relevant than the difference between the background noise level and the operational rating noise level. The operational noise assessment identifies exceedances of the LOAEL but no exceedances of the SOAEL. Planning Policy Guidance Noise defines an exceedance of the LOAEL as follows:</p> <p><i>“Noise can be heard and causes small changes in behaviour, attitude or other physiological response, e.g. turning up volume of television; speaking more loudly; where there is no alternative ventilation, having to close windows for some of the time because of the noise. Potential for some reported sleep disturbance. Affects the acoustic character of the area such that there is a small actual or perceived change in the quality of life.”</i></p> <p>Consequently, it is acknowledged that there may be a perceived change in quality of life as a result of noise. However, it is important to note that the second aim of the Noise Policy Statement for England states that, for noise levels between LOAEL and SOAEL, “...all reasonable steps should be taken to mitigate and minimise adverse effects on health and quality of life while also taking into account the guiding principles of sustainable development. <i>This does not mean that such adverse effects cannot occur.</i>” Embedded mitigation measures set out in of ES Chapter 11 [APP-020/3.1] represent all reasonable steps to mitigate and minimise noise.</p> <p>ES Chapter 11 [APP-020/3.1] provides a method for assessing operational noise whilst accounting for very low background noise levels. This method is defined in accordance with guidance in the “Association of Noise Consultant’s Guide to BS 4142”. This method takes into context the absolute level of operational noise and not just a comparison against background noise levels. Operational noise levels exceeding the LOAEL but not exceeding the SOAEL have been identified at sensitive receptors. In accordance with Planning Practice Guidance Noise, exceedance of the LOAEL: “Affects the acoustic character of the area such that there is a small actual or perceived change in the quality of life.” Consequently, the</p>

Response Reference	Question Number	Summary	Applicant response
			<p>assessment acknowledges that there may be perception that the character of the local area is changing. For exceedances of the LOAEL, the Noise Policy Statement for England states that: "...all reasonable steps should be taken to mitigate and minimise adverse effects on health and quality of life while also taking into account the guiding principles of sustainable development. This does not mean that such adverse effects cannot occur". Reasonable steps to reduce noise are covered in the embedded mitigation section of Chapter 11: Noise and Vibration and have been applied in noise predictions. Consequently, NPSE requirements are complied with through provision of embedded mitigation.</p> <p>Details on assessment assumptions and limitations are provided in section 11.4 of ES Chapter 11 [APP-020/3.1].</p>
<p>12. Socio-economic Effects and Land Use (including Agricultural land and BMV)</p>			
<p>REP2-057 (WLDC)</p>	<p>1.12.13</p>	<p>Re: Tourism (ExA's request for LPA's position on the effects on Tourism)</p> <p>WLDC hold significant concerns about the short and long-term harm that the Gate Burton scheme will have on the tourism sector, and these impacts must be given significant weight in the planning balance.</p> <p>The visitor economy is a significant and growing sector within West Lindsey. Lincolnshire's visitor economy is worth £2.4bn (STEAM data Lincolnshire County Council), with the sector supporting 30,000 jobs and a far reaching supply chain across the county. The impact of Covid lockdowns has been severe. Lincolnshire has experienced a 52% reduction in all tourism spending (STEAM data 2020).</p> <p>Forecasts have predicted that it will take a timescale of up to 2025/26 for businesses in the sector to recover to pre-Covid levels, based on the assumption that no material externalities will compromise this recovery.</p>	<p>The impact on tourism was scoped out of the socio-economic chapter due to the unlikely impact of the Scheme and cumulative schemes. There is only one (tourism) receptor located near the site, the Landmark Trust Chateau.</p> <p>The building has been renovated and now provides accommodation for 2 people. The impact of the Scheme during the construction period will be negligible on this receptor and no impact during operation. The next nearest receptor if located over 2km away, the Black Swan Guest House in Marton. This receptor will not be negatively impacted by the scheme (or cumulative schemes) and may benefit from it during the construction period through an increase in occupancy.</p>

Response Reference	Question Number	Summary	Applicant response
		<p>The construction phase will result in disruption and a degradation to the environmental attributes of the West Lindsey District, which will materially reduce its attractiveness as a destination for visitors. Traffic delays will affect the ability of visitors to travel to and within the district, and construction traffic will conflict with the recreational activities both in terms of use of rural road networks and the attractiveness of the landscape and environment (noise, disturbance, visual impacts etc).</p> <p>During the operational phase of the Gate Burton project, the harm to the landscape will impact upon the reasons people visit West Lindsey, degrading their experience of the area, and having a consequential impact upon visitor numbers and the contribution the sector makes to the local economy.</p> <p>Further details regarding the potential impact on Tourism are set out in WLDC's Written Representation.</p>	
REP2-047 (Bassetlaw DC)	1.12.13	<p>Re: Tourism (ExA's request for LPA's position on the effects on Tourism)</p> <p>It is not anticipated that the proposal will have significant long-term impacts on tourism in Bassetlaw, although there is the potential for temporary impacts during construction, with Sundown Adventureland, Treswell (children's theme park) in close proximity to the main access route.</p>	<p>Comment noted. In terms of temporary impacts during construction, A Framework Construction Traffic Management Plan (CTMP) has been developed and is provided as ES Volume 3: Appendix 13.E [APP-167 to 168/3.3]. The CTMP contains mitigation to avoid and/or reduce impacts, relating to construction traffic including the delivery of materials during construction.</p>
REP2-049 (LCC)	1.12.13	<p>Re: Tourism (ExA's request for LPA's position on the effects on Tourism)</p> <p>There is little further commentary on the potential effects on tourism to assess. Other than either individually or combined with other projects that during the construction stage when up to 4 large solar projects are constructed at the same time would undoubtedly discourage people visiting the area due to the increase in numbers of heavy vehicles using narrow country lanes and the appearance and character of the area resembling a large construction site which is potentially going to continue for a number of years.</p> <p>For the operational phase, if the DCO is granted together with the other projects as outlined above the cumulative impacts of all the projects will change the landscape character of the area to an intensive energy production character, this is likely to</p>	<p>The Scheme will be one of potentially four solar farms within or partially within the 5km study area. At the County and District Landscape Character Area scale all four schemes will lie within the Trent Valley LCA. Although inter-visibility between the schemes will be limited and views in combination typically dominated by the closest solar farm, others are likely to be visible as a distant but discernible element in the view. The relatively flat nature of the landform (albeit rising to the Willingham ridgeline) is such that no elevated views of the footprint of the solar farms will be obtained. Experience of them as an element influencing landscape character will typically be in sequence through repeated views from footpaths or roads. The scale of addition to the landscape of the Trent Valley LCA assuming each scheme includes mitigation through hedgerow or other planting is such that solar farms will be a notable localised</p>

Response Reference	Question Number	Summary	Applicant response
		discourage those who currently visit the area for the qualities this landscape currently offers and consequently will reduce the numbers of visitors who come to this area for recreational purposes.	element rather than a key characteristic. The Trent Valley LCA will not be defined by solar farms or become a 'solar farm landscape' in which they are the defining characteristic. Locally at the scale of LLCA 06/LLCA 07 and LLCA 08 solar farms will represent a medium magnitude of change through addition and longevity such that effects on landscape character will be of moderate significance.
13. Transportation and Traffic			
REP2-053 (NCC)	1.13.1	<p>Re: Comments on Transport Assessment (TA) methodology and conclusions in ES Chapter 13, and comments on whether mitigation and output from CTMP and CEMP address residual effects and whether these are appropriately secured through dDCO:</p> <p>Nottinghamshire County Council as local highway authority is satisfied with the methodology and conclusions of the TA [APP-166] and as reported in the ES Chapter 13 Transport and Access [APP-022]. There is insufficient detail at this time to determine whether coordination proposals between solar projects would sufficiently mitigate the cumulative impacts of construction traffic in relation to the grid connection corridor and the requirement for access via minor roads. It is recommended that a method of coordination between projects is a conditional requirement. Ideally the grid connections would be completed in a single operation where the cable route is shared as well as access to it.</p>	The Applicant agrees that ideally the shared section of the grid connection route would be completed in a single operation and has been working with other developers to put into place mechanisms so enable this to be an option. As discussed above, committing to this is not possible due the uncertainties around which projects will proceed, their timescales and requirements on any respective consent, but the Applicant has committed to work towards this if possible.
REP2-049 (LCC)	1.13.1	<p>Re: Comments on Transport Assessment (TA) methodology and conclusions in ES Chapter 13, and comments on whether mitigation and output from CTMP and CEMP address residual effects and whether these are appropriately secured through dDCO:</p> <p>Yes, the methodology and conclusions is accepted. Mitigation is accepted in principle. Detail of highway works would need to be via normal S278 technical approval processes.</p>	Comment noted.
REP2-053 (NCC)	1.13.2	Re: Abnormal Loads and whether NCC happy with arrangements for abnormal loads in the Framework CTMP.	Comment noted – this requirement is included within the Framework Construction Traffic Management Plan [REP2-020 and 021/3.3] .

Response Reference	Question Number	Summary	Applicant response
		<p>The police and roads and bridge authorities will require advanced notification for approval of each abnormal load under the Road Vehicle Authorisation of Special Types Order 2003. The suitability of each vehicle and the proposed routes will be considered following the County Council being advised of such notification. However, they should be considered as part of the DCO in relation to the coordination of construction traffic outlined in the framework CTMP.</p>	
<p>REP2-049 (LCC)</p>	<p>1.13.2</p>	<p>Re: Abnormal Loads and whether LCC happy with arrangements in Framework CTMP:</p> <p>In principle, the assessment of the routing of abnormal loads is acceptable. Detailed approval will be needed from Streetworks and Permitting when the implementation is due to occur. Some consideration needs to be given to the cumulative impacts from a number of these solar projects which will all potentially require abnormal loads at a similar time and a mechanism for co-ordination of abnormal loads from this project and the others needs to be identified and put into place.</p>	<p>See response to REP2-053 above in terms of abnormal loads (Q 1.13.2) and co-ordinating proposals between solar projects (Q.1.13.1).</p>
<p>REP2-053 (NCC)</p>	<p>1.13.3</p>	<p>Re: proposal that there is no travel plan for the construction and operational phases (para 13.6.68 of ES Chapter 13)</p> <p>There would be limited opportunities to access the site by sustainable modes. The proposed construction worker shuttle bus is welcomed. It is not clear whether there is likely to be sufficient temporary accommodation (CTMP 7.5.9) in the suggested residential centres to make the use of a shuttle bus service viable or how construction workers will reach local centres if accommodation must be found further afield. Travel planning provisions are not considered necessary post construction due to the limited need for access to the grid connection corridor. Sustainable travel would be unlikely to be practical in any event due to the need to transport equipment.</p>	<p>In terms of temporary accommodation, as stated within Chapter 12: Socio-economics [APP-021/3.1] 100% of the peak construction workers could be accommodated in residential centres within a 60-minute drive time of the Scheme which includes peak construction workers for West Burton 2 and 3, and Cottam 1 (the developments located within the zone of influence of the Gate Burton Energy Park Scheme).</p> <p>It should be noted that whilst no separate travel plan has been produced (or was deemed required at scoping) measures relating to construction workers, as typically found in a travel plan, are included within the Framework CTMP [REP2-020-021/3.3]. This includes measures such as providing a shuttle service to transfer construction workers between local settlements and the Solar and Energy Storage Park, a minibus service to transfer staff between the Solar and Energy Storage Park and the Grid Connection Corridor, as well as providing limited car parking and encouraging car sharing to reduce single occupancy vehicles trips on the surrounding highway network.</p> <p>The construction staff split was based on 55% workers (220 persons) residing in the four urban centres surrounding the site (Gainsborough, Retford, Lincoln and Newark on Trent), with the remaining 45% workers (180 persons) being based elsewhere within the study area (i.e. a 60-minute catchment (drive time)). Those residing within the four urban</p>

Response Reference	Question Number	Summary	Applicant response
			centres would be collected/ dropped off at 'hubs' at each of these four locations and transferred to/from the site by shuttle service/minibus. Therefore, 55% workers are expected to be transported by this sustainable mode. Further details relating to the shuttle service are provided within Section 7.5 of the Framework CTMP [REP2-020-021APP-167 and APP-168/3.3] which will be secured through the DCO.
14. Water Environment (including flooding)			
REP2-049 (LCC)	1.14.7	<p>Re: further explanation on what details LCC require regarding areas of site that will be impermeable, and how this is to be dealt with in the requirements of dDCO:</p> <p>This requires a full Drainage Strategy and assessment of impermeable areas to ensure surface water flood risk is not worsened.</p> <p>LCC standard condition wording is:</p> <p>Highway Condition 33</p> <p>The permitted development shall be undertaken in accordance with a surface water drainage scheme which shall first have been approved in writing by the Local Planning Authority.</p> <p>The scheme shall:</p> <ul style="list-style-type: none"> • be based on sustainable drainage principles and an assessment of the hydrological and hydrogeological context of the development; • provide flood exceedance routing for storm event greater than 1 in 100 year; • provide details of how run-off will be safely conveyed and attenuated during storms up to and including the 1 in 100 year critical storm event, with an allowance for climate change, from all hard surfaced areas within the development into the existing local drainage infrastructure and watercourse system without exceeding the run-off rate for the undeveloped site; 	<p>An Outline Drainage Strategy is provided in Appendix 9-C [APP-139 to 141/3.3]. Surface water runoff across the Solar and Energy Storage Park will be discharged to ground through the use of sustainable drainage systems (SuDS) to provide attenuation (both in terms of storage capacity and water quality treatment). With the measures set out in the Outline Drainage Strategy in place, the Flood Risk Assessment (provided in Appendix 9-D of the ES [APP-142/3.3]) concludes that there would be no increase in flooding from any source. The Outline Drainage Strategy is secured through the draft DCO.</p>

Response Reference	Question Number	Summary	Applicant response
		<ul style="list-style-type: none"> • provide attenuation details and discharge rates which shall be restricted to XXX litres per second; • provide details of the timetable for and any phasing of implementation for the drainage scheme; and • provide details of how the scheme shall be maintained and managed over the lifetime of the development, including any arrangements for adoption by any public body or Statutory Undertaker and any other arrangements required to secure the operation of the drainage system throughout its lifetime. <p>No dwelling/ no part of the development shall be brought into use until the approved scheme has been completed or provided on the site in accordance with the approved phasing. The approved scheme shall be retained and maintained in full, in accordance with the approved details.</p>	