

# West Burton Solar Project

## The Applicant's Responses to Relevant Representations

Prepared by: Lanpro Services  
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Infrastructure Planning (Examination Procedure) Rules 2010  
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## Issue Sheet

Report Prepared for: West Burton Solar Project Ltd.  
Examination Deadline 1

### The Applicant's Responses to Relevant Representations

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## 1 Introduction

### 1.1 Purpose of the Document

- 1.1.1 This document provides West Burton Solar Project Limited (the 'Applicant's') response to the Relevant Representations (RRs) which were published by the Planning Inspectorate (PINS) on 4 August 2023, relating to the Development Consent Order Application (the 'Application') for West Burton Solar Project (the 'Scheme').
- 1.1.2 The period for registering as an Interested Party through the submission of a relevant representation ran from 27 April to 8 June 2023. The Applicant confirmed that it has complied with sections 56 and 51 of the Planning Act 2008 and Regulation 16 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. The Application and accompanying documents and information and publishing it in the required manner.
- 1.1.3 A total of 351 RRs were submitted to the Examining Authority by Interested Parties in response to the Scheme DCO Application and were published on the PINS website on 4 August 2023.

### 1.2 Structure of the report

- 1.2.1 This document provides a response from the Applicant to the matters raised in the Relevant Representations and is structured as follows:
- **Table 1.1** lists the RRs received from the host and neighbouring local authorities (Lincolnshire County Council, North Kesteven District Council, West Lindsey District Council). The Applicant notes that Nottinghamshire County Council and Bassetlaw District Council, both host local authorities, have not made a representation at this stage. These responses are analysed and responded to in full in **Section 2.1** of this document.
  - **Table 1.2** lists all statutory consultees, international agencies, undertakers, and elected representatives with whom the Applicant has undertaken a Statement of Common Ground. These responses are analysed and responded to in full in **Section 2.2** of this document.
  - **Table 1.3** lists all other statutory consultees, international agencies, undertakers, and elected representatives. These responses are analysed and responded to in full in **Section 2.3** of this document.
  - **Table 1.4** lists the RRs received from parish councils, parish meetings, or neighbourhood community groups. These responses are analysed and responded to in full in **Section 2.4** of this document.
  - **Table 1.5** lists those whose interests would be affected by the Order (as listed within **WB4.3\_A Book of Reference Revision A [EN010132/APP/WB4.3\_A]**). These responses are analysed and responded to in full in **Section 2.5** of this document.

- **Table 1.6** lists the Theme Options in which Relevant Representations from members of the public and all remaining organisations and businesses are categorised into and responded to in **Section 3** of this document.

- 1.2.2 References to the Application documentation are provided in accordance with the referencing system set out in the Planning Inspectorate's West Burton Solar Farm Examination Library.
- 1.2.3 Revision suffixes have also been attached to documents which, since submission, have been revised for and resubmitted by Deadline 1 to the Planning Inspectorate.
- 1.2.4 Additionally, submissions to the Planning Inspectorate post 12 January 2023 carry revised indications to identify by which deadline the submission had been made to the Planning Inspectorate. All documents submitted to the Planning Inspectorate by 21 March 2023 carry '/APP/' within their document reference. Those new submissions made to the Planning Inspectorate post-submission and during the pre-examination stage carry '/PEX/' instead of '/APP/' within the document reference, to reflect the submission being made during the pre-examination stage. Those new submissions, such as this document, being submitted for and by Deadline 1 carry '/EX1/' within the document reference.

### 1.3 Tables of Organisations Submitting Relevant Representation

**Table 1.1: List of Organisations whose Relevant Representations are Responded to in Section 2.1.**

PINS Reference	Acronym	Relevant Representation Received from
RR-188	LCC-XX	Lincolnshire County Council
RR-350	WLDC-XX	West Lindsey District Council
RR-243	NKDC-XX	North Kesteven District Council

**Table 1.2: List of Organisations whose Relevant Representations are Responded to in Section 2.2.**

PINS Reference	Acronym	Relevant Representation Received from
RR-123	HE-XX	Historic England
RR-232	NH-XX	National Highways
RR-090	EA-XX	Environment Agency
RR-236	NRIL-XX	Network Rail Infrastructure Limited
RR-233	NE-XX	Natural England

**Table 1.3: List of Organisations whose Relevant Representations are Responded to in Section 2.3.**

<b>PINS Reference</b>	<b>Acronym</b>	<b>Relevant Representation Received from</b>
RR-001	7A-XX	7000 Acres
RR-018	AWSL-XX	Anglain Water Services Limited
RR-032	CGL-XX	Cadent Gas Limited
RR-033	CRT-XX	Canal & River Trust
RR-055	CRB-XX	Cllr Richard Butroid
RR-077	EDF-XX	EDF Energy (Thermal Genertaion) Limited
RR-093	FC-XX	Forestry Commission
RR-230	BGED-XX	National Grid Electricity Distribution (East Midlands)
RR-231	NGET-XX	National Grid Electricity Transmussion
RR-245	PCC-XX	Parochial Church Council of the Parish of Stow-with-Sturton
RR-297	SNP-XX	Saxilby Nature Project
RR-298	SPRGC-XX	Saxilby Public Recreation Ground Charity
RR-310	SCA-XX	Solar Campaign Alliance
RR-321	SSNPG-XX	Sturton and Stow Neighbourhood Planning Group
RR-331	TBHS-XX	The British Horse Society
RR-341	UKHSA-XX	UK Health Security Agency
RR-342	UKAEA-XX	United Kingdom Atomic Energy Authority
RR-347	NP-XX	Weightmans LLP (on behalf of Northern Powergrid)
RR-351	WHIDB-XX	Witham & Humber IDB

**Table 1.4: List of Organisations whose Relevant Representations are Responded to in Section 2.4.**

<b>PINS Reference</b>	<b>Acronym</b>	<b>Relevant Representation Received from</b>
RR-029	BVPM	Brampton Village Parish Meeting
RR-030	BPC	Brattleby Parish Council
RR-031	BPM	Broxholme Parish Meeting
RR-091	FPM	Fillingham Parish Meeting
RR-178	KePC	Kexby Parish Council
RR-179	KnPC	Knaith Parish Council
RR-213	MGBPC	Marton & Gate Burton Parish Council
RR-299	SIPC	Saxilby with Ingleby Parish Council
RR-300	ScPC	Scampton Parish Council
RR-319	StPC	Stow Parish Council
RR-322	SSPC	Sturton by Stow Parish Council



**Table 1.5: List of Organisations whose Relevant Representations are Responded to in Section 2.5.**

<b>PINS Reference</b>	<b>Acronym</b>	<b>Relevant Representation Received from</b>
RR-038	CF	Catrin Fieldson
RR-046	CW	Christine Warren
RR-076	ECM	E C Morgan
RR-087	EH	Emma Hill
RR-147	JC	Jill Cowley
RR-172	KS	Kate Skelton
RR-181	CSP	Lanpro Services (on behalf of Cottam Solar Project)
RR-238	NH	Nicholas Hill
RR-259	PB	Philip Bartle
RR-281	RB	Rodger Brownlow
RR-289	SE	Sally Elliott
RR-308	SNSE	SNSE Ltd
RR-309	SNSD	SNSD Ltd
RR-333	TSL	Tillbridge Solar Limited

**Table 1.6: List of Theme Options in which Relevant Representations from Members of the Public and All Remaining Organisations and Businesses are Categorised into and Responded to in Section 3.**

Theme Options	Acronym	Relevant Representations responded to through the Theme Option
Air Quality	AIR-xx	RR-007; RR-010; RR-019; RR-021; RR-022; RR-034; RR-040; RR-042; RR-044; RR-053; RR-054; RR-062; RR-063; RR-066; RR-067; RR-071; RR-075; RR-079; RR-088; RR-095; RR-097; RR-102; RR-106; RR-108; RR-110; RR-115; RR-118; RR-121; RR-124; RR-137; RR-139; RR-152; RR-153; RR-154; RR-156; RR-157; RR-175; RR-190; RR-194; RR-202; RR-211; RR-220; RR-222; RR-224; RR-235; RR-246; RR-247; RR-252; RR-255; RR-272; RR-273; RR-274; RR-275; RR-276; RR-278; RR-292; RR-294; RR-301; RR-312; RR-316; RR-319; RR-325; RR-327; RR-328; RR-340
Alternatives and Design Evolution	ALT-xx	RR-003; RR-005; RR-006; RR-007; RR-008; RR-010; RR-011; RR-013; RR-015; RR-019; RR-020; RR-021; RR-022; RR-026; RR-027; RR-034; RR-036; RR-040; RR-045; RR-049; RR-052; RR-053; RR-054; RR-057; RR-061; RR-062; RR-063; RR-064; RR-066; RR-067; RR-069; RR-070; RR-072; RR-074; RR-078; RR-079; RR-080; RR-082; RR-083; RR-085; RR-088; RR-095; RR-096; RR-097; RR-100; RR-102; RR-103; RR-104; RR-105; RR-106; RR-107; RR-108; RR-110; RR-111; RR-112; RR-115; RR-116; RR-119; RR-121; RR-126; RR-129; RR-131; RR-132; RR-134; RR-135; RR-136; RR-138; RR-139; RR-142; RR-143; RR-145; RR-150; RR-152; RR-153; RR-155; RR-156; RR-157; RR-159; RR-160; RR-161; RR-162; RR-163; RR-164; RR-166; RR-168; RR-169; RR-170; RR-171; RR-173; RR-174; RR-175; RR-180; RR-183; RR-185; RR-187; RR-190; RR-191; RR-192; RR-194; RR-196; RR-198; RR-199; RR-202; RR-203; RR-205; RR-206; RR-209; RR-210; RR-214; RR-217; RR-220; RR-221; RR-222; RR-223; RR-224; RR-225; RR-226; RR-227; RR-228; RR-229; RR-239; RR-241; RR-247; RR-251; RR-252; RR-254; RR-257; RR-258; RR-264; RR-267; RR-269; RR-271; RR-272; RR-273; RR-276; RR-277; RR-278; RR-284; RR-290; RR-292; RR-295; RR-301; RR-303; RR-304; RR-305; RR-306; RR-307; RR-311; RR-312; RR-318; RR-325; RR-330; RR-332; RR-334; RR-336; RR-338; RR-339; RR-343; RR-348

Theme Options	Acronym	Relevant Representations responded to through the Theme Option
Climate Change	CLI-xx	RR-340
Cultural Heritage	CUL-xx	RR-019; RR-021; RR-075; RR-082; RR-130; RR-133; RR-156; RR-165; RR-202; RR-244; RR-247; RR-306
Ecology and Biodiversity	ECO-xx	RR-004; RR-005; RR-007; RR-010; RR-015; RR-017; RR-019; RR-021; RR-022; RR-023; RR-024; RR-025; RR-027; RR-040; RR-044; RR-053; RR-055; RR-056; RR-059; RR-061; RR-063; RR-064; RR-067; RR-068; RR-069; RR-070; RR-071; RR-072; RR-075; RR-079; RR-081; RR-082; RR-083; RR-084; RR-088; RR-095; RR-097; RR-100; RR-102; RR-103; RR-106; RR-113; RR-114; RR-115; RR-116; RR-117; RR-118; RR-120; RR-121; RR-124; RR-125; RR-128; RR-131; RR-132; RR-139; RR-141; RR-142; RR-148; RR-150; RR-153; RR-156; RR-158; RR-159; RR-160; RR-162; RR-163; RR-166; RR-169; RR-171; RR-174; RR-175; RR-176; RR-182; RR-183; RR-184; RR-186; RR-187; RR-189; RR-190; RR-193; RR-194; RR-195; RR-196; RR-197; RR-198; RR-202; RR-204; RR-205; RR-206; RR-207; RR-208; RR-209; RR-210; RR-211; RR-214; RR-217; RR-218; RR-220; RR-222; RR-227; RR-229; RR-235; RR-237; RR-239; RR-240; RR-246; RR-247; RR-248; RR-252; RR-253; RR-254; RR-255; RR-256; RR-257; RR-258; RR-262; RR-263; RR-264; RR-268; RR-269; RR-270; RR-271; RR-274; RR-275; RR-277; RR-278; RR-280; RR-286; RR-287; RR-288; RR-290; RR-292; RR-301; RR-302; RR-303; RR-304; RR-305; RR-306; RR-312; RR-314; RR-315; RR-316; RR-317; RR-318; RR-319; RR-327; RR-329; RR-336; RR-337; RR-339; RR-340; RR-343; RR-345
Energy Need	ENE-xx	RR-003; RR-005; RR-021; RR-039; RR-062; RR-073; RR-075; RR-078; RR-080; RR-082; RR-095; RR-106; RR-107; RR-115; RR-119; RR-121; RR-126; RR-156; RR-160; RR-168; RR-186; RR-191; RR-205; RR-220; RR-257; RR-271; RR-272; RR-279; RR-285; RR-293; RR-303; RR-307; RR-334; RR-338; RR-339
General	GEN-xx	RR-005; RR-010; RR-021; RR-022; RR-037; RR-053; RR-058; RR-063; RR-066; RR-082; RR-088; RR-092; RR-095; RR-098; RR-099; RR-106; RR-114; RR-120; RR-122; RR-132; RR-152; RR-156; RR-161; RR-167; RR-169; RR-175; RR-184; RR-194; RR-205; RR-210;

Theme Options	Acronym	Relevant Representations responded to through the Theme Option
		RR-222; RR-247; RR-257; RR-267; RR-278; RR-279; RR-284; RR-320; RR-324; RR-336
Glint and Glare	GLI-xx	RR-021; RR-053; RR-067; RR-106; RR-154; RR-156; RR-312
Hydrology, Flood Risk and Drainage	HFD-xx	RR-010; RR-020; RR-022; RR-054; RR-106; RR-139; RR-154; RR-222; RR-251; RR-262; RR-284; RR-312
Landscape and Visual Impact	LAN-xx	RR-002; RR-004; RR-005; RR-007; RR-010; RR-013; RR-015; RR-019; RR-021; RR-022; RR-024; RR-026; RR-034; RR-040; RR-042; RR-045; RR-047; RR-048; RR-053; RR-055; RR-056; RR-058; RR-060; RR-061; RR-063; RR-066; RR-067; RR-070; RR-071; RR-072; RR-075; RR-078; RR-079; RR-082; RR-088; RR-095; RR-097; RR-098; RR-100; RR-101; RR-102; RR-103; RR-104; RR-106; RR-107; RR-110; RR-111; RR-113; RR-114; RR-116; RR-118; RR-119; RR-121; RR-125; RR-126; RR-130; RR-138; RR-151; RR-152; RR-153; RR-155; RR-156; RR-157; RR-158; RR-164; RR-165; RR-168; RR-170; RR-171; RR-174; RR-175; RR-176; RR-180; RR-183; RR-186; RR-187; RR-190; RR-191; RR-194; RR-195; RR-196; RR-200; RR-201; RR-202; RR-203; RR-205; RR-206; RR-210; RR-211; RR-214; RR-215; RR-217; RR-222; RR-223; RR-225; RR-226; RR-227; RR-235; RR-240; RR-247; RR-248; RR-252; RR-255; RR-256; RR-257; RR-258; RR-260; RR-261; RR-262; RR-263; RR-264; RR-267; RR-268; RR-269; RR-271; RR-272; RR-273; RR-274; RR-275; RR-276; RR-278; RR-279; RR-283; RR-284; RR-287; RR-288; RR-290; RR-292; RR-293; RR-296; RR-301; RR-302; RR-305; RR-306; RR-307; RR-312; RR-313; RR-316; RR-325; RR-326; RR-328; RR-329; RR-334; RR-335; RR-336; RR-338; RR-340; RR-343; RR-346
Other Environmental Matters	OEM-xx	RR-013; RR-021; RR-022; RR-025; RR-028; RR-034; RR-036; RR-037; RR-040; RR-042; RR-054; RR-055; RR-061; RR-063; RR-067; RR-079; RR-089; RR-102; RR-103; RR-116; RR-121; RR-124; RR-131; RR-137; RR-139; RR-142; RR-149; RR-151; RR-153; RR-156; RR-157; RR-168; RR-170; RR-175; RR-180; RR-182; RR-191; RR-193; RR-194; RR-196; RR-202; RR-205; RR-220; RR-222; RR-235; RR-239; RR-240; RR-246; RR-247; RR-252; RR-253; RR-257; RR-262; RR-263; RR-267; RR-268; RR-271; RR-273; RR-275; RR-278;

Theme Options	Acronym	Relevant Representations responded to through the Theme Option
		RR-284; RR-301; RR-312; RR-316; RR-323; RR-327; RR-329; RR-338; RR-340
Principle of Development	PRI-xx	RR-002; RR-003; RR-004; RR-005; RR-010; RR-011; RR-015; RR-016; RR-017; RR-019; RR-020; RR-021; RR-022; RR-028; RR-034; RR-037; RR-040; RR-041; RR-042; RR-045; RR-053; RR-054; RR-055; RR-058; RR-059; RR-060; RR-062; RR-063; RR-065; RR-066; RR-067; RR-070; RR-071; RR-072; RR-075; RR-078; RR-079; RR-082; RR-083; RR-086; RR-088; RR-095; RR-097; RR-098; RR-100; RR-102; RR-103; RR-106; RR-107; RR-108; RR-109; RR-110; RR-112; RR-115; RR-116; RR-119; RR-121; RR-124; RR-125; RR-129; RR-130; RR-131; RR-132; RR-133; RR-134; RR-136; RR-138; RR-139; RR-142; RR-146; RR-148; RR-151; RR-152; RR-153; RR-154; RR-155; RR-156; RR-157; RR-158; RR-161; RR-164; RR-165; RR-167; RR-168; RR-174; RR-175; RR-183; RR-185; RR-186; RR-187; RR-189; RR-191; RR-192; RR-193; RR-194; RR-199; RR-200; RR-202; RR-205; RR-208; RR-210; RR-211; RR-212; RR-215; RR-217; RR-220; RR-222; RR-223; RR-225; RR-226; RR-235; RR-239; RR-242; RR-244; RR-247; RR-248; RR-250; RR-251; RR-252; RR-254; RR-255; RR-257; RR-260; RR-261; RR-262; RR-264; RR-265; RR-267; RR-268; RR-269; RR-270; RR-271; RR-272; RR-273; RR-274; RR-276; RR-278; RR-279; RR-280; RR-282; RR-284; RR-285; RR-286; RR-287; RR-290; RR-293; RR-294; RR-296; RR-301; RR-302; RR-303; RR-305; RR-306; RR-307; RR-311; RR-312; RR-313; RR-314; RR-315; RR-316; RR-317; RR-323; RR-325; RR-327; RR-334; RR-335; RR-338; RR-339; RR-343; RR-345; RR-346
Socio-economics, Tourism and Recreation	STR-xx	RR-005; RR-007; RR-008; RR-012; RR-015; RR-019; RR-020; RR-021; RR-022; RR-025; RR-037; RR-040; RR-044; RR-053; RR-055; RR-059; RR-060; RR-062; RR-063; RR-067; RR-079; RR-083; RR-088; RR-095; RR-102; RR-103; RR-104; RR-113; RR-115; RR-118; RR-119; RR-124; RR-126; RR-133; RR-139; RR-140; RR-142; RR-146; RR-154; RR-156; RR-160; RR-168; RR-170; RR-171; RR-173; RR-175; RR-176; RR-191; RR-193; RR-194; RR-198; RR-199; RR-202; RR-205; RR-220; RR-222; RR-234; RR-235; RR-240; RR-246; RR-247; RR-257; RR-262; RR-263; RR-265; RR-267;

Theme Options	Acronym	Relevant Representations responded to through the Theme Option
		RR-268; RR-272; RR-275; RR-280; RR-284; RR-303; RR-307; RR-312; RR-316; RR-334; RR-335; RR-337; RR-343; RR-344
Soils and Agriculture	SOI-xx	RR-003; RR-004; RR-006; RR-007; RR-008; RR-009; RR-010; RR-013; RR-014; RR-015; RR-019; RR-020; RR-021; RR-022; RR-024; RR-025; RR-026; RR-028; RR-034; RR-035; RR-036; RR-039; RR-040; RR-041; RR-042; RR-043; RR-045; RR-047; RR-049; RR-050; RR-051; RR-052; RR-053; RR-054; RR-055; RR-056; RR-057; RR-058; RR-059; RR-060; RR-061; RR-062; RR-063; RR-065; RR-066; RR-067; RR-069; RR-070; RR-073; RR-074; RR-075; RR-078; RR-079; RR-080; RR-081; RR-082; RR-083; RR-085; RR-086; RR-088; RR-096; RR-097; RR-099; RR-100; RR-101; RR-102; RR-103; RR-104; RR-105; RR-106; RR-107; RR-109; RR-110; RR-111; RR-112; RR-114; RR-115; RR-116; RR-117; RR-118; RR-119; RR-121; RR-124; RR-125; RR-126; RR-127; RR-128; RR-129; RR-130; RR-131; RR-132; RR-133; RR-136; RR-138; RR-139; RR-140; RR-141; RR-142; RR-143; RR-144; RR-145; RR-148; RR-150; RR-151; RR-152; RR-153; RR-154; RR-155; RR-156; RR-157; RR-159; RR-160; RR-161; RR-162; RR-163; RR-164; RR-165; RR-166; RR-168; RR-169; RR-170; RR-171; RR-173; RR-174; RR-176; RR-177; RR-182; RR-183; RR-184; RR-185; RR-187; RR-189; RR-191; RR-192; RR-193; RR-194; RR-196; RR-197; RR-198; RR-199; RR-200; RR-202; RR-203; RR-205; RR-206; RR-207; RR-209; RR-211; RR-212; RR-214; RR-215; RR-216; RR-217; RR-219; RR-220; RR-221; RR-222; RR-223; RR-224; RR-225; RR-226; RR-227; RR-228; RR-229; RR-234; RR-237; RR-239; RR-246; RR-247; RR-248; RR-249; RR-251; RR-252; RR-253; RR-254; RR-255; RR-256; RR-257; RR-258; RR-262; RR-263; RR-264; RR-265; RR-266; RR-268; RR-271; RR-272; RR-273; RR-274; RR-275; RR-276; RR-277; RR-278; RR-280; RR-284; RR-287; RR-288; RR-290; RR-291; RR-292; RR-293; RR-294; RR-295; RR-296; RR-301; RR-302; RR-303; RR-304; RR-305; RR-306; RR-307; RR-311; RR-312; RR-313; RR-314; RR-315; RR-316; RR-318; RR-323; RR-325; RR-326; RR-327; RR-328; RR-329; RR-330; RR-332; RR-335; RR-336;

Theme Options	Acronym	Relevant Representations responded to through the Theme Option
		RR-337; RR-338; RR-339; RR-343; RR-346; RR-348; RR-349
Transport and Access	TRA-xx	RR-004; RR-005; RR-007; RR-010; RR-019; RR-028; RR-034; RR-054; RR-055; RR-061; RR-062; RR-068; RR-071; RR-075; RR-080; RR-081; RR-082; RR-088; RR-094; RR-095; RR-098; RR-100; RR-101; RR-102; RR-106; RR-110; RR-115; RR-121; RR-127; RR-131; RR-139; RR-142; RR-149; RR-153; RR-154; RR-158; RR-168; RR-169; RR-173; RR-183; RR-187; RR-190; RR-193; RR-194; RR-196; RR-217; RR-219; RR-220; RR-222; RR-247; RR-252; RR-256; RR-263; RR-274; RR-280; RR-284; RR-292; RR-303; RR-305; RR-325; RR-329; RR-335; RR-343
Waste	WAS-xx	RR-011; RR-021; RR-037; RR-044; RR-053; RR-070; RR-129; RR-131; RR-156; RR-157; RR-193; RR-205; RR-257; RR-272; RR-327

## 2 The Applicant's Responses to Relevant Representations

### 2.1 The Applicant's Responses to the Host and Neighbouring Local Authorities

Table 2.1.1: Applicant's Response to Lincolnshire County Council [RR-188]

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
LCC-01	General	Examination and Structure of Relevant Representation.	<p>"Following the Planning Inspectorate confirmation that the above project has been accepted as an application for a Development Consent Order (DCO) to construct a solar energy park, Lincolnshire County Council (LCC) request to be registered as an Interested Party at the Examination.</p> <p>This letter provides a summary of the issues which LCC currently agrees/and or disagrees with together with an appropriate explanation in accordance with Planning Inspectorate note 8.3. In summary an outline of the principal topics which LCC intends to address in relation to the application during the examination will cover the following:</p> <ul style="list-style-type: none"> <li>• Minerals and waste – as Minerals and Waste Planning Authority;</li> <li>• Highways and Transportation - as Local Highway Authority for Lincolnshire;</li> <li>• Cultural Heritage;</li> <li>• Landscape and Visual Impact;</li> </ul>	The Applicant notes this comment and has provided responses to each of the matters raised in the Relevant Representation below.



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<ul style="list-style-type: none"> <li>• Fire Safety;</li> <li>• Public Rights of Way;</li> <li>• Surface Water, Flooding and Drainage – as Lead Local flood Authority for Drainage;</li> <li>• Carbon Reduction;</li> <li>• Agricultural Land use;</li> <li>• Growth;</li> <li>• Public Health.”</li> </ul>	
LCC-02	Minerals Waste	Mineral Safeguarding	<p>“For the solar array locations, only a very small part of just one of the sites affects safeguarded mineral resources, and due to the nature of the proposals the Council remain satisfied that sterilisation would be negligible. As before, there are no existing/allocated mineral sites in proximity to any of the PV sites so again, no safeguarding implications.</p> <p>Regarding the cable route corridors, these have been refined since the PEIR has been produced, and it is noted that, as set out in the ES, “the Cable Route Corridor has been designed so that wherever possible cable routes follow existing infrastructure corridors or alternatively follow the edge of significant landscape features rather than directly crossing open fields. Such an approach avoids creating a further obstruction to the future exploitation of the mineral resource” this</p>	The Applicant notes this comment.

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>approach aligns with the Councils previous discussions with the developer. It is also noted that the proposed cable route in the vicinity of the River Trent overlaps with those of other proposed solar projects in the area, therefore minimising cumulative impact on the safeguarded mineral resources in this area.</p> <p>The Council therefore have no mineral safeguarding objections to the application."</p>	
LCC-03	Transport and Access	ES Chapter	<p>"Consider that the assessment within the Transport and Access Chapter is appropriate and provides a reasonable estimate of HGV and car traffic associated with the development during construction. For most of the construction routes the impact will be within acceptable levels on the highway network."</p>	The Applicant notes this comment.
LCC-04	Transport and Access	HGV Access to West Burton 1	<p>"However, concern is raised regarding the access route proposed for West Burton 1. This is proposed to use around 1.2km of the unclassified road south of A1500 (Figure 6.1 of TA). The number of daily vehicles using this, associated with the development, would be five HGVs and 23 cars. This is in addition to the surveyed flows of around 200 existing daily vehicles on this route.</p> <p>This road is a single track road around 3m in width, passing cars need to use the verge and for cars passing HGVs it is problematic. The road is</p>	<p>The Applicant acknowledges this comment. As set out in Table 2.1 of the <b>6.3.14.1_A Environmental Statement - Appendix 14.1 Transport Assessment Revision A [EN010132/EX1/WB6.3.14.1_A]</b>, 183 vehicle movements were recorded using this road during an average weekday (24 hour). Adding the construction traffic flow to the 2025 traffic flows equates to 249 vehicle movements. Over a 24-hour period, this represents a very low volume of traffic.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			also not straight with several sharp bends over this short length."	The raw survey data is included in Appendix B of the Transport Assessment.
LCC-05	Transport and Access	All Access to West Burton 1	<p>"Section 7 of the Transport Assessment (TA) proposes this same route for abnormal loads, with vehicles of 100 tonnes and 36m in length using this route.</p> <p>The TA suggest in Para 8.6 that temporary pass-by bays will be created on narrower sections of the highway and the DCO would allow powers to make adjustments in the highway verge."</p>	The Applicant acknowledges this comment. As stated, powers to make adjustments in the highway verge for pass-by bays will be granted through the updated <b>DCO [EN010132/EX1/WB3.1_A]</b> .
LCC-06	Transport and Access	HGV Access to West Burton 1	"Recommend that for construction traffic, the applicant needs at this stage to identify where passing bays will be located on this route, there should be at least one bay on each straight section of the route, making around three bays over the 1.2km section. The proposed access points (Access 1 and 2) are to be at existing field accesses which are located on the bends. Layouts of the access junctions need preparing with swept paths for HGVs to show that two way movements can occur and the extent of the junction improvements necessary."	<p>As stated, powers to make adjustments in the highway verge for pass-by bays will be granted through the <b>DCO [EN010132/EX1/WB3.1_A]</b>.</p> <p>To provide reassurances to LCC that passing bays can be delivered, indicative passing locations are shown in Drawing SK18, Drawing SK19 and Drawing SK20, contained in <b>6.3.14.1_A Environmental Statement - Appendix 14.1 Transport Assessment Revision A [EN010132/EX1/WB6.3.14.1_A]</b>. One passing location is shown per straight segment. All passing locations are deliverable within the highway boundary, but will use the verge in places. In order to protect existing hedgerows and tree roots, no dig construction methods will be applied.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
LCC-07	Transport and Access	AIL Access to West Burton 1	"Do not consider this route is suitable for abnormal loads of 100 tonnes and 36m in length. The road is a rural lane which is not constructed for these loads and the width and alignment would prohibit such a large vehicle using this route. The Wynn Report included in the Appendix to the TA shows the route in Appendix 1 and drawing number 22-1062.SPA04 shows road widening necessary on first bend – this involves land outside the highway boundary and the widening required on the next bend (about 450m to the west) has not been shown although the abnormal load would need to go further west to reach the first access into the site. There is no evidence provided that the road construction is capable of taking this abnormal load."	As set out in Table 7.1 of the <b>6.3.14.1_A Environmental Statement - Appendix 14.1 Transport Assessment Revision A [EN010132/EX1/WB6.3.14.1_A]</b> , there will be just a single abnormal delivery to West Burton 1. This will be undertaken by a five-axle bed with five axel draw bar trailer, which is approximately 36m in length. The swept path analysis of this vehicle is shown in Appendix B. This shows that the vehicle can manoeuvre along the unnamed road to the West Burton 1 access, within the highway land, or land within the red line.  Prior to the abnormal load movement, all appropriate notifications will be made, including to LCC, National Highways and the Police. This will include a full route assessment and identification of where widening of carriageway or the use of protective matting is required.
LCC-08	Hydrology, Flood Risk and Drainage	Surface Water Drainage Strategy	"The surface water drainage strategy is appropriate for the development and an appropriate worded requirement can be included within the DCO for the full details."	The Applicant notes this comment and that requirement 11 'Surface and foul water drainage' in <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> secures provision of a detailed surface water drainage scheme.
LCC-09	Transport and Access	DCO Requirements	"The DCO includes appropriate requirements for detailed design approval of access, parking, construction traffic management, drainage to be approved by the LPA prior to commencement."	The Applicant notes this comment and that requirement 11 'Surface and foul water drainage' in <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> secures

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
	Hydrology, Flood Risk and Drainage  Principle of Development (DCO)			provision of a detailed surface water drainage scheme.
LCC-10	Transport and Access  Socio- economics, Tourism and Recreation	Public Rights of Way	"The Council will make comments in relation to Public Rights of Way in the Local Impact Report."	The Applicant notes this comment.
LCC-11	Cultural Heritage	Adequacy of Archaeological Evaluation	"Inadequate field evaluation has been undertaken with 342 trenches across 886ha, less than 0.34% of the red line boundary. Informed appropriate mitigation measures therefore cannot exist for nearly 80% of the site, and proposed 'preservation in situ' mitigation for those archaeologically sensitive areas which have been identified would cause damage and destruction to uninvestigated and unrecorded significant archaeology. Neither evaluation nor proposed mitigation has been competently undertaken and the submitted documents are not robust."	The Applicant respectfully disagrees with Lincolnshire Historic Place Team (LHPT) and considers that sufficient evaluation, which is proportionate and in scope for the stage at which the Scheme has reached, has been undertaken to inform the DCO Application. The evaluation works are also sufficient to inform any required post-consent works as detailed and secured through <b>6.3.13.7 Environmental Statement - Appendix 13.7 Archaeological Mitigation WSI</b> (Written Scheme of Investigation) [APP-122]. Implementation of the Scheme in accordance with the WSI is secured by Requirement 12 of Schedule 2 in <b>3.1_A Draft Development Consent Order Revision A</b> [EN010132/EX1/WB3.1_A].

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>The Applicant considers that they have taken a reasonable, proportionate and consistent approach supported by national and local guidance and best practice, which has enabled the collection of high-quality reliable data. This has provided an adequate understanding of the archaeological potential and developmental impacts as set out in <b>6.2.13 Environmental Statement - Chapter 13_Cultural Heritage [APP-051]</b> and has been used to formulate an appropriate mitigation strategy as set out in <b>6.3.13.7 Environmental Statement - Appendix 13.7 Archaeological Mitigation WSI [APP-122]</b>.</p> <p>In the first instance the archaeological assessment comprised: <b>6.3.13.1 Environmental Statement - Appendix 13.1 Archaeological Desk-Based Assessments [APP-105 to APP-108]</b>, <b>6.3.13.2 Environmental Statement - Appendix 13.2 Archaeological Geophysical Survey Reports [APP-109 to APP-114]</b>, <b>6.3.13.3 Environmental Statement - Appendix 13.3 Geoarchaeological DBA (Desk-Based Assessment) [APP-115]</b> and <b>6.3.13.4 Environmental Statement - Appendix 13.4 AP (Air Photo) and LiDAR Reports [APP-116]</b>, which successfully identified the absence/ presence/ extent of archaeological sites within the Order Limits of the Scheme. An informed programmed of archaeological evaluation trial trenching was</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>undertaken as part of the West Burton Scheme, which comprised 358 trenches (overall sample of 0.36% of the whole Scheme area). The results of which, as detailed in <b>6.3.13.6 Environmental Statement - Appendix 13.6 Archaeological Evaluation Trenching Reports [APP-120 to APP-121]</b>, both verified the results of the non-intrusive assessments, and where archaeological deposits have been identified, provided further information regarding their extent, character, preservation and archaeological significance.</p> <p>The Applicant considers that, in accordance with the Central Lincolnshire Local Plan (Paragraph 10.0.16, and Policy S57) and the Overarching National Policy Statement for Energy (EN-1) (revised March 2023; Paragraph 5.9.26), there should be a preference to preserving archaeological remains. As identified in the National Policy Statement for Renewable Energy Infrastructure (EN-3) (March 2023; Paragraph 3.10.101) as a potential benefit of solar PV developments, the Applicant would like to highlight the positive effect the Scheme will have on the archaeological features identified within the Scheme's Order Limits, which are currently at risk from the impacts of ploughing (Paragraphs 13.7.43 and 13.7.44 of <b>6.2.13 Environmental Statement - Chapter 13_Cultural Heritage [APP-051]</b>). Consequently, where appropriate the</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>Applicant has proposed "preservation in-situ" either in the form of 'no development' areas, non-intrusive concrete anchors or directional drilling (cable route), to minimise harm to buried archaeological remains and where possible allow the archaeological resource within the site to be conserved in-situ.</p> <p>The Applicant considers that this approach provides a sufficient level of baseline information, as captured within Section 13.5 of <b>6.2.13 Environmental Statement - Chapter 13_Cultural Heritage [APP-051]</b>, on which the Examining Authority can issue a recommendation and the Secretary of State to determine the DCO Application, allowing for suitable archaeological mitigation to be carried out pursuant to the implementation of <b>6.3.13.7 Environmental Statement - Appendix 13.7 Archaeological Mitigation WSI [APP-122]</b> which is secured by Requirement 12 of Schedule 2 to <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p>
LCC-12	Cultural Heritage	Adequacy of Archaeological Evaluation	<p>"Significant concerns were raised regarding the applicant's proposed approach during the pre-application stage, particularly regarding the extremely limited amount of proposed trenching. To find a way forward a meeting was held with LCC archaeologists, the applicant, their archaeological consultants (Lanpro) and the</p>	<p>The Applicant acknowledges that there was difficulty agreeing an appropriate sample for evaluation trial trenching. In May 2022 LHPT requested 3% of the Scheme area to be sampled with a 1% contingency. The Applicant considered this request to be unreasonable and disproportionate taking into account the nature</p>



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>Planning Inspectorate. The applicant agreed in the meeting to a programme of around 2% evaluation trenching (with a 2% contingency) of the entire redline boundary in order to provide sufficient data to adequately inform the EIA, ES Chapter and provide a basis for an outline mitigation strategy to be submitted with the DCO application.</p> <p>It has become clear that 2% trenching has taken place only in certain parts of the redline boundary totalling 21% of the site. Despite this the submitted documents present the Cultural Heritage section is presented as completely assessed and evaluated with a full and complete understanding of the archaeological resource across the site. This is not the case.</p> <p>All the areas within the redline boundary and the grid connection corridor which have not been subject to evaluation trenching remain unknown in terms of archaeological potential, therefore impact cannot be determined nor can there be informed effective reasonable mitigation."</p>	<p>and limited ground impact of the majority of the Scheme. As agreement could not be reached, a meeting was held between the Applicant, LHPT and the Planning Inspectorate on 09.06.2022, in which LHPT reiterated their requirement for a 3% area trenching sample (with a 1% contingency). In the meeting, both parties agreed a staged approach to trenching, commencing on sensitive locations identified by the geophysical survey.</p> <p>At no point during the meeting did the Applicant agree to carry out a 2% sample with a 1% contingency for the entire Scheme area.</p> <p>The WSI detailed methodology for pre-application evaluation trial trenching, and its accompanying initial trench plans, focused on areas where geophysical survey and other non-intrusive survey had identified buried archaeological deposits and was agreed by email between the Applicant and LHPT on the 14.07.2022. The sample of trenching used for the agreed trench plans was in line with the coverage agreed with LHPT on the nearby Cottam Solar Project (2% sample with a 2% contingency; email pertaining to the Cottam Scheme dated the 17.06.2022). No agreement was reached between the Applicant and LHPT regarding 'blank' areas where geophysical and other non-intrusive surveys had not identified buried archaeological remains, as evidenced by the meeting notes produced by the</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>Planning Inspectorate for the meeting between the Planning Inspectorate, LHPT and the Applicant on the 09.06.2022 (<b>6.3.13.9 Environmental Statement - Appendix 13.9 Consultation Response Tables [APP-124]</b>).</p> <p>The Applicant does not consider that an uninformed high sample (i.e. 2% area) of evaluation trenching across the entire Order Limits of the Scheme is reasonable or proportionate to understand the likely significant effects of the Scheme on archaeological assets. The approach proposed by LHPT does not have regard to baseline and survey data, which has proven to be reliable.</p> <p>The Applicant also considers that the LHPT requirements are inconsistent with other NSIP solar schemes in Lincolnshire currently going through the DCO Application process. For example, the sample of evaluation trenching agreed to by LHPT for the nearby Gate Burton Scheme, estimated by the Applicant to be 1.16%, was considered by LHPT to be sufficient to inform the Gate Burton DCO Application and mitigation strategy. When asked directly, LHPT were unable to provide a reasonable justification for the different trenching samples (for example, LHPT did not refer to the difference in approach being based on differences in the historic environment between the two schemes, such as a major</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>difference in the cultural heritage background of the two sites.). The Applicant therefore considers that LHPT has not adequately justified their request for a programme of trenching with a high 2% (plus contingency) sample.</p> <p>The applicant also highlights that the sample of evaluation trial trenching greatly exceeds the coverage deemed appropriate on other solar-based NSIPs that have been approved by the Planning Inspectorate, for example the applicant has calculated the consented Little Crow Solar Park (EN010101) in North Lincolnshire undertook an evaluation trial trenching sample of c.0.47% and the recently-consented Longfield Solar Project (EN010118) in Essex undertook c.0.08% sample.</p> <p>If further informative trenching across the Scheme is assessed to be necessary, the Applicant considers that, in accordance with correspondence with the Planning Inspectorate <b>(6.3.13.9 Environmental Statement - Appendix 13.9 Consultation Response Tables [APP-124])</b>, and guided by numerous case studies in the East Midlands, Yorkshire and the Humber and North East Regions, this should be undertaken post-consent of the DCO Application at a 1% area sample. If this was to be undertaken in this case, it is estimated that the overall sample of trenching across the Scheme would total 1.18%</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>(which equates to 18% of the Order Limits undertaken at a 2% sample completed pre-determination and 82% of the Order Limits at a 1% sample undertaken pre-construction) and would be in line with what was considered sufficient by LHPT for the nearby Gate Burton Solar Project.</p> <p>The Applicant respectfully disagrees with LHPT's comments on the adequacy of the approach adopted and considers that the level of work undertaken has provided sufficient information and enabled the production of a robust Environmental Statement chapter (<b>6.2.13 Environmental Statement - Chapter 13_Cultural Heritage [APP-051]</b>) on which to determine the DCO Application and inform suitable archaeological mitigation to be carried out pursuant to the implementation of <b>6.3.13.7 Environmental Statement - Appendix 13.7 Archaeological Mitigation WSI [APP-122]</b> which is secured by Requirement 12 of Schedule 2 to <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p>
LCC-13	Cultural Heritage	Adequacy of Management and Mitigation Measures	"This is a landscape where archaeology has been revealed within 20cm below the existing ground surface: in the neighbouring Cottam application area this has included fragile Saxon human remains which were entirely unexpected.	As referenced by LHPT, burials of an early medieval date were identified as part of the archaeological evaluation works for the nearby Cottam Solar Project (EN010133). The burials were located adjacent to contemporaneous ditches that were recorded by a geophysical

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>As well as completely inadequate evaluation the proposed mitigation shows little attempt at reasonable measures which adequately deal with development impact. The applicants 'Preservation in situ' section 7.2 of Appendix 13.7: Written Scheme of Investigation for Archaeological Mitigation states they will use concrete ground anchors. This proposed mitigation is entirely inappropriate and unacceptable and would cause any surviving archaeology, especially in areas of shallow deposits which encompasses much of this agricultural landscape, to be damaged or destroyed without investigation and recording.</p> <p>There would be compaction when the ground anchors are installed, settling and readjustment during the decades of operational life and ground disturbance when the ground anchors are ripped out in decommissioning as the land will need to be restored 'to its preconstruction condition at the end of the operation.' (Outline Decommissioning Statement section 2.1.6) There is no mention of archaeology in the Outline Decommissioning Statement including Table 3.1 Decommissioning Mitigation and Management Measures."</p>	<p>survey undertaken as part of the field evaluation for the Scheme, and so archaeological features in this area were not unexpected. The burials were located at depths of between 30 and 40cm and had been heavily disturbed by plough damage, hence their 'fragile nature'. Consequently, the Cottam Solar Project has proposed a mechanism to record and preserve the inhumations in advance of the proposed development and protect them from impact by agricultural activity (as detailed in Table 6.1.1 of <b>Cottam Solar Project EN010133: C6.3.13.7 ES Appendix 13.7 Archaeological Mitigation WSI [APP-131]</b>). No burials were encountered during archaeological evaluation works for the West Burton Scheme.</p> <p>In line with the Central Lincolnshire Local Plan (Paragraph 10.0.16, and Policy S57) and the Overarching National Policy Statement for Energy (EN-1) (revised March 2023; Paragraph 5.9.26), the Applicant considers that there should be a preference for conserving heritage assets. Consequently, where possible the Applicant has recommended that archaeological remains are safeguarded by mitigation through in-situ preservation either in the form of 'no development' areas, non-intrusive concrete anchors or directional drilling (cable route). Concrete anchors are a nationally recognised method for archaeological mitigation by design.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>This is demonstrated by guidance provided by Cornwall Council (BRE National Solar Centre, 2013, P.13), and the numerous examples of solar schemes where LPAs have agreed the use of concrete anchors to safeguard buried archaeological remains. For example, schemes where concrete anchors have been considered appropriate archaeological mitigation include: The Grange (19/01408/FULM) in Nottinghamshire, Land south-east Of A6108 Darlington Road (21/00931/FULL) in North Yorkshire, Eastfield Farm (19/04321/STPLF) in East Riding of Yorkshire, Conesby Solar Park (PA/2018/2140) in North Lincolnshire, Vine Farm, Shingay-cum-Wendy (S/1067/14/FL) in Cambridgeshire.</p> <p>The Applicant believes that careful consideration should be given to the appropriateness of intrusive archaeological mitigation works (i.e. mitigation by record) for the majority of the Scheme where mitigation by record has the potential to cause greater impact than that caused by the Scheme. For example, the solar panel ground anchors are estimated to cause minimal ground impact (estimated to impact c.0.07% of the area denoted by Works Nos. 1A (i, ii, iii), 1B (i, ii, iii) and 1C (i, ii, iii) on <b>2.3_B Works Plan Revision B [EN010132/EX1/WB2.3_B]</b>). The Applicant considers that concrete anchors will provide an opportunity to prevent any impact</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>within areas of the Scheme in which concentrations of archaeological remains have been identified.</p> <p>The Applicant would also like to highlight that during the field evaluation, it was identified that ploughing was causing a high level of destruction to archaeological deposits. Consequently, the Applicant considers that the Scheme will provide an opportunity to protect archaeological remains that are currently at risk of destruction from agricultural activity (Paragraphs 13.7.43 and 13.7.44, <b>6.2.13 Environmental Statement - Chapter 13_Cultural Heritage [APP-051]</b>).</p> <p>As stated in Paragraph 13.7.54 <b>[APP-051]</b>, a Decommissioning Environmental Management Plan will be prepared prior to decommissioning and agreed with relevant stake holders. This is secured by Requirement 12 of Schedule 2 to <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p>
LCC-14	<p>Cultural Heritage</p> <p>Ecology and Biodiversity</p> <p>Landscape and Visual Impact</p>	<p>Impacts to Archaeology from Ecology and Landscape Mitigation Measures</p>	<p>"Looking through the submission documents there are also extensive further ground impacts from other proposed mitigations such as wildlife ponds, miscanthus planting, woodland and shelterbelt planting, and bird habitat scrapes up to 0.5m deep. All these proposed mitigations have significant below ground impacts yet the potential impact on surviving archaeological</p>	<p>Landscape and ecological mitigation is proposed across the Scheme to enhance existing habitats and green infrastructure, as detailed in <b>7.3_A Outline Landscape and Ecological Management Plan Revision A [EN010132/EX1/WB7.3_A]</b>, <b>6.4.8.18.1-3 Environmental Statement - Figure 8.18.1-3 - Landscape and Ecology Mitigation and</b></p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>remains is not known, and again no archaeological mitigation is proposed."</p>	<p><b>Enhancement Measures Plans</b> (Figures 8.18.1 to 8.18.3) <b>[WB6.4.8.18.1_A to WB6.4.8.18.3_A]</b>. These documents are secured through Requirement 7 of Schedule 2 to <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p> <p>The landscape and ecological mitigation have been informed by cultural heritage, see <b>6.2.13 Environmental Statement - Chapter 13 Cultural Heritage [APP-051]</b>.</p> <p>Additional views suggested by Lincolnshire County Council and Nottinghamshire County Council, that include locations where heritage assets may be affected, are also taken into account within the Landscape and Visual Impact Assessment, see <b>6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> (the 'LVIA') at Section 8.2. Detailed overlap and consultation with the Heritage topic areas has also been undertaken when developing the landscape and visual baseline and in identifying landscape and visual effects for the LVIA Chapter.</p> <p>Where the evaluation has identified a potential for archaeological remains to be present mitigation in the form of 'strip, map and record' has been proposed (for example: WB1/03, WB2/07, WBCR/02 – see <b>6.3.13.7 Environmental</b></p>



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p><b>Statement - Appendix 13.7 Archaeological Mitigation WSI [APP-122]</b>). Where non-intrusive survey and assessment, for example geophysical survey and evaluation trenching, has not identified archaeological remains (for example within West Burton 1 Field M3, West Burton 2 Field N1 and West Burton 3 Fields Q1, Q5, Q6, Q7, Q8), the Applicant considers that no archaeological mitigation is required.</p> <p>If further archaeological mitigation is required in advance of the implementation of specific landscape and ecological mitigation, the Applicant considered an archaeological watching brief during topsoil stripping as part of the construction process would be sufficient mitigation (<b>6.3.13.7 Environmental Statement - Appendix 13.7 Archaeological Mitigation WSI [APP-122]</b>).</p>
LCC-15	Cultural Heritage	Adequacy of Baseline Evidence	<p>"The applicant has failed to provide a reasonable baseline assessment of the archaeological resource and the development's impact upon it. This is contrary to relevant guidance and policy and to professional standards and it means that at this stage any proposed mitigation is uninformed and therefore cannot be fit for purpose. Further archaeological evaluation within the red line boundary is necessary to understand the extent, nature and significance of surviving</p>	<p>The Applicant respectfully disagrees that they "have failed to provide a reasonable baseline assessment of the archaeological resource and the development's impact upon it". The Applicant also respectfully disagrees that the assessment is "contrary to relevant guidance and policy and to professional standards".</p> <p>The Applicant considers that the phased programme of archaeological evaluation was completed to a high standard and has produced</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>archaeology so that appropriate mitigation can be determined."</p>	<p>high quality data that has sufficiently informed the Environmental Statement submitted as part of the DCO Application, as well as the need for any pre-construction archaeological works.</p> <p>The first phase of assessment and field evaluation comprising: <b>6.3.13.1 Environmental Statement - Appendix 13.1 Archaeological Desk-Based Assessments [APP-105 to APP-108], 6.3.13.2 Environmental Statement - Appendix 13.2 Archaeological Geophysical Survey Reports [APP-109 to APP-114], 6.3.13.3 Environmental Statement - Appendix 13.3 Geoarchaeological DBA [APP-115] and 6.3.13.4 Environmental Statement - Appendix 13.4 AP and LiDAR Reports [APP-116]</b>, successfully identified numerous previously unrecorded sites. In particular, the geophysical survey, which was undertaken across all accessible areas within the Scheme, identified numerous concentrations of archaeological features, and was used to inform the Scheme Design (for example the removal of fields from the order limits next to the Deserted Village of North Ingleby Scheduled Monument (NHLE: 1003570).</p> <p>Geophysical survey is an internationally recognised evaluation methodology for identifying the absence/presence of buried archaeological remains. The Chartered Institute for Archaeology (CIfA) Standards and Guidance</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>for Field Evaluation (2020) defines a field evaluation as "a limited programme of non-intrusive and/or intrusive fieldwork which determines the presence or absence of archaeological features, structures, deposits, artefacts or ecofacts and their research potential, within a specified area or site on land".</p> <p>There are numerous examples of geophysical survey being used as an evaluation technique either in isolation or with a low sample of targeted evaluation trial trenching to evaluate the archaeological potential of land within solar schemes in the east and north-east of England. Examples of solar schemes approved in the last five years taking this approach include: Land south-east Of A6108 Darlington Road (21/00931/FULL) in North Yorkshire, Conesby House Farm (PA/2018/2140) in North Lincolnshire, Eastfield Farm (19/04321/STPLF) in East Riding of Yorkshire, Chestnut Farm (P/21/2661/2) in Leicestershire and Vine Farm (S/1067/14/FL) in Cambridgeshire), as well as the recently consented NSIPs Longfield Solar Farm (EN010118) and Little Crow Solar Park (EN010101).</p> <p>The results of <b>6.3.13.2 Environmental Statement - Appendix 13.2 Archaeological Geophysical Survey Reports [APP-109 to APP-114]</b> were verified by a programme of evaluation</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>trial trenching (<b>6.3.13.6 Environmental Statement - Appendix 13.6 Archaeological Evaluation Trenching Reports [APP-120 to APP-121]</b>), which targeted both concentrations of geophysical anomalies interpreted as being of an archaeological origin and 'blank' areas where no archaeological anomalies were identified. Where archaeological features were encountered there was an excellent correlation between the results of the geophysical survey and evaluation trial trenching, and the evaluation trial trenching was considered to be sufficient to enhance information regarding the extent, character, preservation and significance of the archaeological features.</p> <p>The combined programme of non-intrusive and intrusive evaluation is considered by the Applicant to have met the objectives of a field evaluation as set out by ClfA (2020) and so is sufficient to inform the DCO Application. Any further archaeological works required will be carried out pursuant to the implementation of <b>6.3.13.7 Environmental Statement - Appendix 13.7 Archaeological Mitigation WSI [APP-122]</b> which is secured by Requirement 12 of Schedule 2 to <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
LCC-16	Cultural Heritage	Archaeological Potential	"Insufficient evaluation has been undertaken to allow for an understanding of the archaeological potential or to provide the basis for reasonable mitigation to deal with the impacts of this development."	<p>The Applicant respectfully disagrees with LHPT and considers that the results of the field evaluation (geophysical survey, as well as those of other non-intrusive techniques, coupled with targeted and informed evaluation trial trenching) are sufficient to identify the archaeological potential within the Scheme's Order Limits, and inform the DCO Application.</p> <p>The results of the evaluation trial trenching were found by the Applicant to correspond with those of the geophysical survey. No unexpected archaeological sites were identified during the evaluation trial trenching. Several 'blank' areas, where geophysical survey had not identified archaeological deposits, were tested and found not to contain archaeological remains. For example, the east of Fields M2 and M3 in West Burton 1, west of Field N1 and east of Field N1 in West Burton 2 and west of Field Q1, north-west of Field Q7, and east of Fields Q15 and Q16 in West Burton 3 <b>6.3.13.6 Environmental Statement - Appendix 13.6 Archaeological Evaluation Trenching Reports [APP-120 to APP-121].</b></p> <p>Therefore, the Applicant considers that the range of research, non-intrusive surveys and evaluation trenching has provided sufficient information as per ClfA guidelines (2020) to inform a robust mitigation strategy, as set out in <b>6.3.13.7 Environmental Statement - Appendix 13.7</b></p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<b>Archaeological Mitigation WSI [APP-122]</b> which is secured by Requirement 12 of Schedule 2 to <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> .
LCC-17	Cultural Heritage	Policy and Legislative Requirements	"Sufficient baseline information on the archaeology to be impacted across the site is required by NPPF, EIA Regulations and National Policy Statement EN-1 which states <i>"The applicant should ensure that the extent of the impact of the proposed development on the significance of any heritage assets affected can be adequately understood from the application and supporting documents (5.8.10)."</i>	<p>The Applicant agrees that "sufficient baseline information on the archaeology to be impacted across the site is required by NPPF, EIA Regulations and National Policy Statement EN-1".</p> <p>The Applicant considers the approach taken and conclusions reached in assessing the impacts of the Scheme on cultural heritage assets (including archaeology) within the Order Limits and study areas as set out in <b>6.2.13 Environmental Statement - Chapter 13 Cultural Heritage [APP-051]</b> are appropriate and in line with relevant policy and guidance including Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (Regulation 5 (2d)), National Planning Statement Policy EN1 (2011; Section 5.8) and the National Planning Policy Framework.</p> <p>In accordance with the draft Overarching National Policy Statement for Energy (EN-1, revised March 2023; Paragraphs 5.9.10 and 5.9.11) and draft National Policy Statement for Renewable Energy Infrastructure (EN-3, revised March 2023; Paragraphs 3.10.104 and 3.10.105) and NPPF (Paragraph 194), the Applicant considers the level</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>of detail provided in <b>6.2.13 Environmental Statement - Chapter 13 Cultural Heritage [APP-051]</b> is proportionate to the assets' importance and sufficient to understand the potential impact of the proposed Scheme on their significance. The historic environmental record, as well as other data sources (i.e NHLE, NRHE, PAS and historic maps) was consulted as part of the assessment undertaken. Information obtained is set out in <b>6.3.13.1 Environmental Statement - Appendix 13.1 Archaeological Desk-Based Assessments [APP-105 to APP-108]</b>. As the area within the Order Limits had the potential to contain heritage assets with an archaeological interest, a field evaluation was undertaken in accordance with The Chartered Institute for Archaeology (CifA) Standards and Guidance for Field Evaluation (2020), and comprised archaeological geophysical survey reports (<b>6.3.13.2 Environmental Statement - Appendix 13.2 Archaeological Geophysical Survey Reports [APP-109 to APP-114]</b>) and a programme of informed archaeological evaluation trial trenching reports (<b>6.3.13.6 Environmental Statement - Appendix 13.6 Archaeological Evaluation Trenching Reports [APP-120 to APP-121]</b>).</p> <p>The Applicant considers that the level of assessment and evaluation has provided</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				sufficient information to enable the production of a robust ES Chapter on which the Secretary of State can determine the DCO Application. The data collected has informed suitable archaeological mitigation, set out in <b>6.3.13.7 Environmental Statement - Appendix 13.7 Archaeological Mitigation WSI [APP-122]</b> , which is secured by Requirement 12 of Schedule 2 to <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> .
LCC-18	Cultural Heritage	Further Comments	"A fuller and detailed explanation of the Councils concerns will be provided as part of the subsequent Local Impact Report."	The applicant notes this comment.
LCC-19	Landscape and Visual Impact	Accessibility of Key Information	"The Council draw attention to the volume of information provided within the LVIA and associated appendices, which while very detailed, makes the identification and clear understanding of key landscape and visual issues (as well as providing succinct review comments) difficult at this stage."	The Applicant has submitted a summary and narrative of effects at Deadline 1 set out in the Supplementary ES Landscape Information: <b>Landscape Effects Tables [EN010132/EX1/WB8.2.1]</b> and in Supplementary ES Landscape Information: <b>Visual Effects Tables [EN010132/EX1/WB8.2.2]</b> which summarises the main findings of the LVIA. This non-technical summary is to assist readers understand the conclusions of the LVIA and contains a list of potentially affected receptors with summarising narrative to provide context and identify what the key issues are.



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
LCC-20	Landscape and Visual Impact	ES Chapter: Non-Technical Summary	<p>"The main LVIA chapter is some 252 pages with no clear summary or analysis of effects to communicate to the reader the main findings of the assessment, relying in cross referencing numerous appendices. The Environmental Statement: Non-Technical Summary <b>[[APP-308]]</b> would particularly benefit from this for non-technical readers as the landscape and visual section contains a list of potentially affected receptors with limited summarising narrative provided to provide context or identify what the key issues are.</p> <p>However, it is understood that the volume of information is in part due to the fragmented nature of the development and cable routes covering a wide area, creating additional elements to consider beyond a simple, or singular redline boundary. A lot of the supporting information is provided within associated appendices which provide very detailed information relating to the assessment. Therefore, suggest the examination process is utilised to provide a clearer and more succinct identification and summary of the key landscape and visual issues and effects."</p>	<p>The Applicant has submitted a summary and narrative of effects at Deadline [1] set out in the Supplementary ES Landscape Information: <b>Landscape Effects Tables [EN010132/EX1/WB8.2.1]</b> and in Supplementary ES Landscape Information: <b>Visual Effects Tables [EN010132/EX1/WB8.2.2]</b> which summarises the main findings of the LVIA. This non-technical summary is to assist readers understand the conclusions of the LVIA and contains a list of potentially affected receptors with summarising narrative to provide context and identify what the key issues are.</p>
LCC-21	Landscape and Visual Impact Glint and Glare	Significant Adverse Effects of the Scheme	<p>"By reason of its mass and scale, the proposed development would lead to significant effects upon landscape character and visual amenity. The development has the potential to transform</p>	<p><b>6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> (the 'LVIA') takes into account the effects on the landscape character in detail, from</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>the local landscape by altering the character on a large scale, which is likely to be exacerbated by the fragmented nature of the separate development plots connected by cable routes spread over an extensive area."</p>	<p>the national scale (see paragraphs 8.5.11, 8.5.59 and 8.10.13), through regional (see paragraphs 8.5.17, 8.7.12 and 8.10.14), county district and local scales (see paragraphs 8.5.26 and 8.5.35) to the landscape character areas within the identified 5km Study Area.</p> <p>Within the LVIA [APP-046], it is acknowledged that there will be a minor adverse change to the character of the landscape at Site level and within parts of the Regional Scale Landscape Character Area – Profile 4a: Unwooded Vales (defined within the East Midlands Regional Landscape Character Assessment) during the construction and operational (Year 1) phases of the Scheme. With the Local Scale Landscape Character Area – Profile 3: The Till Vale (defined within the West Lindsey Landscape Character Assessment), it is also acknowledged that there will be a minor adverse change at Site level during the construction and operational (Year 1) phases of the Scheme. For further information, please refer to <b>6.3.8.2 Environmental Statement - Appendix 8.2 Assessment of Potential Landscape Effects [APP-073]</b>. These associated appendices provide a detailed assessment of the effects on each landscape receptor including the character areas from the East Midlands Regional Landscape Character Assessment and the West Lindsey District Landscape Character Assessment.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p><b>6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> has concluded for the 5km Study Area and the Site, there are no likely significant adverse effects for the construction stages of the Scheme on land use. Taking into account the impacts of embedded and additional mitigation there are also no likely significant effects for the operation (Year 1 and Year 15) stages of the Scheme and these effects would be beneficial (see paragraphs 8.7.14 to 8.7.18). Parts of the LVIA Chapter of the Environmental Statement has also concluded that there are no likely-significant adverse effects for the construction, operation (Year 1 and Year 15) and decommissioning stages of the Scheme on topography and watercourses and that enhancing the visibility of streams, dykes and other watercourses in the landscape would bring forward some positive benefits. The landscape proposals for the Site protect belts of waterside trees and riparian habitats to distinguish these watercourses in the landscape. The planting of trees and replacing lost hedgerows in flood plains to improve landscape character and attenuate flood flows is also an important element of the secondary landscape mitigation (See paragraphs 8.7.19 to 8.7.22).</p> <p>The Scheme comprises a series of separate areas of land or Sites (see Sections 3.3 to 3.6 of <b>6.2.3 ES</b></p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p><b>Chapter 3_The Order Limits [APP-041]</b> which are set within an extensive agricultural landscape. With large areas of land between each of the Sites, each is set apart by their associated features such as robust hedgerows, woodland and tree cover, intervening settlements and road and rail infrastructure (see paragraphs 8.5.115, 8.5.132 and 8.5.148 of 6.2.8 ES Chapter 8_Landscape and Visual Impact Assessment <b>[APP-046]</b>).</p> <p>The LVIA <b>[APP-046]</b> draws out the benefits of the Scheme being spread over a large area with separation between sites reducing intervisibility both in combination and cumulatively with other solar projects. For example, (para. 8.10.26) with the Gate Burton Energy Park, this is to the north of Willingham Road where woodland associated with Gate Burton and mature roadside woodland along the east west Willingham Road and the A1500 provides separation between Gate Burton Energy Park and the WB3 Site. This woodland is ensuring that these developments occupy separate landscape compartments and maintain spatial separation.</p> <p>With separation and cumulate effects, for example with the Cottam proposal, this is illustrated on 6.4.8.17.1 Environmental Statement - Figure 8.17.1 - Cumulative Development Augmented ZTV - Cottam <b>[APP-277]</b>, as being</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>located to the north east of the settlements of Stow and Willingham. This is showing that the cumulative effects of these projects would therefore not occur due to the significant distance between them. The LVIA concludes that with Regional Character Areas and Individual Contributors to Landscape Character, there is potential for cumulative effects, but that these would be <b>Not Significant</b>. The LVIA sets out (para. 8.10.86) for example, with regard to Viewpoint LCC-A-Middle Street that <i>"There may be opportunities (depending upon weather and atmospheric visibility) for successional glimpses of the West Burton and Cottam Sites. However, if available, this would be very glimpsed, transient and filtered by vegetation across the landscape and would be regarded as two detached solar schemes in two separate land parcels."</i></p> <p>The LVIA Methodology [APP-072] that underpins the assessment places a reliance on planting to mitigate adverse effects setting out the three ways in which this mitigation has been approached (para. 1.1.34) being 'primary', 'secondary' and 'tertiary' mitigation. With regard to 'secondary mitigation', the methodology considers these measures to be established for Year 15 of the Scheme and that "Assessing the impacts of the Scheme at Year 15 is considered to be appropriate in the context of landscape</p>

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				character and visual amenity, since it is judged to be the most effective in terms of effectiveness of maturation of planting and the 'time depth' of the receiving landscape". These 'secondary' measures look to add inherent value to the landscape character and reduce visual impacts of the Scheme and its environs and to exceed planning policy expectations.
LCC-22	Landscape and Visual Impact	Changes to Land Use Across a Large Area	<p>"The Council are particularly concerned about the effects upon the landscape character through changes to the land use, which would be spread throughout a wide area, rather than a more focussed development plot being read as a solar development occupying a single site in a wider landscape.</p> <p>However, the development has been identified in the LVIA as resulting in no residual adverse significant effects to any landscape receptors, assessing the residual effects as being beneficial to landscape receptors, which appears overly reliant upon mitigation planting"</p>	Refer to LCC-21 above as this comment is dealing with the same issues.
LCC-23	Landscape and Visual Impact	Significant Adverse Effects of the Scheme	"The scale and extent of development would also lead to significant adverse effects on views from receptors, changing from views within an agricultural or rural landscape to that of a landscape containing extensive areas of large scale solar. Also, while landscape mitigation may screen elements once established, it also has the	<b>6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> (the 'LVIA') includes a full and detailed assessment that deals with both effects (see paragraph 8.4.23) on the landscape itself and effects on the visual amenity of people, as well as changing views. The LVIA has been prepared

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>potential to change the character and extent of existing views by shortening or enclosing currently open views across the landscape.</p> <p>Despite this, the development has been identified in the LVIA as resulting in no residual adverse significant changes to any receptors."</p>	<p>following an iterative processes (see paragraphs 8.4.5, 8.6.1, 8.8.2, 8.8.8.3 and 8.11.1) and as a result, the design of the Scheme changed to respond to the findings of the assessment to ensure that landscape mitigation is fully considered as part of the process. The assessment has been undertaken in accordance with the methodology set out in <b>6.3.8.1 Environmental Statement - Appendix 8.1 LVIA Methodology [APP-072]</b>.</p> <p>With regard to open views across the landscape, the LVIA <b>[APP-046]</b> has taken into account and assessed viewpoints, residential, transport and PRoW receptors. For example with WB1, this includes viewpoint VP01 <b>[APP-194]</b> where in facing north east there are distant and wide open views towards the far horizon at Brattleby and Scampton and with viewpoint VP03 <b>[APP-196]</b> there is open visibility facing west across the River Till. For WB2, this includes viewpoint LCC-C-E <b>[APP-255]</b> where in facing north east, open views are framed by woodland cover in the foreground. For WB3, this includes LCC-C-K <b>[APP-261]</b> where in facing both north east and south east, there are open views across the River Trent and its associated floodplain towards the wider landscape.</p> <p><b>6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact Assessment</b></p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>[APP-046] includes a suite of 57 viewpoints (see paragraph 8.5.179 and Table 16) that cover a wide range of visual receptors, including public locations such as transport routes, PRoW and residential properties. There are also an additional 15 viewpoints that have been included in the assessment at the request of Lincolnshire County Council (see paragraph 8.5.182 and Table 8.17) following agreement at the LVIA Workshops held prior to submission .</p> <p>The LVIA [APP-046] considers that for some aspects of the Scheme the findings of the assessment has resulted in an adverse effect. For example, of the 57 initial viewpoints and the 15 LCC viewpoints, significant adverse effects have been identified within a representative sample (and is not exhaustive) at the construction and operation (year 1) assessment years, resulting from the proximity of the viewpoint receptors to the Scheme and the predicted nature of the effects. Adverse effects have been assessed to viewpoints VP1, VP2, VP7, VP9, VP10 and LCC-C: the LVIA (Table 8.57) has concluded there would be moderate significant adverse effects. In respect of viewpoint VP8, significant adverse effects have been assessed for the construction and operation (year 1 and year 15) phases. For further information, please refer to <b>6.3.8.3 Environmental Statement - Appendix 8.3</b></p>



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p><b>Assessment of Potential Visual Effects [APP-074].</b> These associated appendices provide a detailed assessment of visual effects on each visual receptor including PRoW, transport and residential receptors.</p> <p>Where effects have been identified, then strategic landscape mitigation measures have been identified within <b>6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> (see paragraphs 8.6.11 to 8.6.16) Please also refer to <b>6.3.8.5 Environmental Statement - Appendix 8.5 Policy Commentary [APP-076]</b> for further information on how these mitigation measures relate to the design (to ensure that the LVIA is compliant with the relevant policy ) and how they are applied to offset or remedy any adverse effects.</p>
LCC-24	Landscape and Visual Impact	Assessment of Close-Range Views	"The only significant effects to views have been assessed as being beneficial, above the baseline view, at the Operation (15 Year) phase and the justification for this should be investigated and clarified at the examination as it is currently unclear as to why these visual benefits would be gained with benefits more aligned with landscape elements than visual."	The conclusions on the likely significant effects for the visual receptors are set out within Section 8.7 of <b>6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> and <b>6.3.8.3 Environmental Statement - Appendix 8.3 Assessment of Potential Visual Effects [APP-074]</b> . . The justification for the conclusions reached are set out within this appendix to make clear as to why these visual benefits would be gained.

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
LCC-25	Landscape and Visual Impact	Assessment of Long-Range Views	"Long range, open and panoramic views across the low lying Till Vale from elevated land to the east, including from within The Ridge Area of Great Landscape Value (AGLV) are also a concern, which while of a longer range, would potentially include views down onto large areas of solar development, with larger elements, such as sub-stations, being particularly conspicuous in this low lying landscape."	<b>6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> considers both the landscape and visual effects of the Scheme on the local environment, including taking account of views across the low-lying Till Vale from Gainsborough as the baseline situation. The LVIA (see paragraph 8.5.13 and 8.9.45) recognises the importance of these long views out to the west and how the combination of tree cover and an undulating landform can also provide a sense of enclosure (paragraph 8.5.29) and also notes that long views are typically contained, particularly to the east of the A156 and A1133 spine roads. The LVIA includes a suite of 57 initial viewpoints with some that cover long range views, for example viewpoints VP3, VP4, VP13, VP16, VP19, VP20, VP30, VP32, VP35, VP36, VP43 and VP47. There are also an additional 15 viewpoints included in the assessment at the request of Lincolnshire County Council that were agreed at the LVIA Workshops held prior to submission that also include long range views, for example LCC_F, LCC-G, LCC-J, LCC-K and LCC-L. The visual effects for the long-range views are set out in <b>6.3.8.3 Environmental Statement - Appendix 8.3 Assessment of Potential Visual Effects [APP-074]</b> .

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
LCC-26	Landscape and Visual Impact	Cumulative Effects	<p>"The cumulative landscape and visual effects of the proposed development are also of concern, particularly when assessed alongside the proposed Gate Burton, Cottam and Tillbridge Solar application sites. The mass and scale of these projects combined and cumulatively would lead to adverse effects upon landscape character and visual amenity over an extensive area. The landscape character of the area may be completely altered, albeit over a temporary period, particularly when experienced sequentially."</p>	<p>The conclusions on the likely significant cumulative effects on the landscape and visual receptors are set out within Section 8.10 of <b>6.2.8 Environmental Statement - Chapter 8_Landscape and Visual Impact Assessment [APP-046]</b>, <b>6.3.8.2 Environmental Statement - Appendix 8.2 Assessment of Potential Landscape Effects [APP-073]</b> and <b>6.3.8.3 Environmental Statement - Appendix 8.3 Assessment of Potential Visual Effects [APP-074]</b>.</p> <p>With regard to the cumulative effects, <b>6.2.8 Environmental Statement - Chapter 8_Landscape and Visual Impact Assessment [APP-046]</b> assesses the impacts of the Scheme alongside the proposed Gate Burton, Cottam and Tillbridge Solar proposals and concludes that significant adverse effects would not occur on landscape character and visual amenity over an extensive area.</p> <p>The cumulative effects with the Cottam proposals are illustrated on <b>6.4.8.17.1 Environmental Statement - Figure 8.17.1 - Cumulative Development Augmented ZTV - Cottam [APP-277]</b> The Cottam proposals are located to the northeast of the settlements of Stow and Willingham. The conclusion in the LVIA is that cumulative effects arising from the West Burton and Cottam projects would not occur due to the</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>significant distance between the projects. The LVIA concludes that in respect of Regional Character Areas and Individual Contributors to Landscape Character, there is potential for cumulative effects, but that these would be 'Not Significant' in EIA terms. The LVIA sets out for example, with regard to Viewpoint LCC-A-Middle Street (para. 8.10.86) that <i>"There may be opportunities (depending upon weather and atmospheric visibility) for successional glimpses of the West Burton and Cottam Sites. However, if available, this would be very glimpsed, transient and filtered by vegetation across the landscape and would be regarded as two detached solar schemes in two separate land parcels."</i></p> <p>The cumulative effects with the Gate Burton proposals are illustrated on <b>6.4.8.17.2 Environmental Statement - Figure 8.17.2 - Cumulative Development Augmented ZTV - Gate Burton [APP-278]</b>. The Gate Burton proposals are located to the west of the settlements of Willingham by Stow, Kexby and Upton. The conclusion in the LVIA is that cumulative effects arising from the West Burton and Gate Burton projects would not occur due to the significant distance between the projects. The LVIA concludes that in respect of Regional Character Areas and Individual Contributors to Landscape Character, there is potential for</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>cumulative effects, but that these would be 'Not Significant' in EIA terms. The LVIA sets out for example, with regard to transport receptor T058/Northern Railway – Saxilby to Gainsborough (para. 8.10.88) that <i>"The route continues north through the Gate Burton Energy Park development, with users having views of the surrounding array as they pass through", but that the effects would be Not Significant."</i></p> <p>The cumulative effects with the Tillbridge proposals are illustrated on <b>6.4.8.17.3 Environmental Statement - Figure 8.17.3 - Cumulative Development Augmented ZTV - Tillbridge [APP-279]</b>. The Tillbridge proposals are located to the west and east of the settlement of Springthorpe and situated between the settlements of Heapham, Hemswell Cliff and Glentworth. The conclusion of the LVIA is that cumulative effects between the Tillbridge and West Burton proposals would not occur due to the significant distance between the projects. The LVIA concludes that in respect of Regional Character Areas and Individual Contributors to Landscape Character, there is potential for cumulative effects, but that these would be '<b>Not Significant</b>' in EIA terms The LVIA sets out for example, with regard to location and proximity (para. 8.10.22) that the distance between West Burton and the Tillbridge project is such that no</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				significant cumulative effects are possible " <i>The Tillbridge Solar Project continues from the northern extent of the Cottam 1 Site north towards the A631. The Cottam Solar Project is approximately 1.5km north of the West Burton 1 Site. The Tillbridge Solar Project is approximately 7.25km north of the West Burton 1 Site.</i> "
LCC-27	Ecology and Biodiversity Landscape and Visual Impact Transport and Access	Impact on /Removal of Existing Trees, Hedgerows and Other Important Vegetation	"The application has not provided sufficient information in regards to the impact upon, or protection of, existing trees, hedgerows and other important vegetation in order for comment to be made at this stage. These impacts are not limited to the solar development areas, but associated with access and highways works to facilitate the development, such as construction access, particularly from large plant, or access points and associated visibility splays. It is unclear on the landscape and ecology plans as to the extent of vegetation removal proposed, and the LVIA implies little or no vegetation removal is proposed. Appendix 14.1: Transport Assessment also identifies some localised areas of hedge trimming. The extent of this needs clarifying at the examination stage."	The Applicant will make clear as an update document ( <b>Hedgerow Removal Plans [EN010132/EX1/WB7.3_A]</b> ) to the Landscape and Ecology Mitigation and Enhancement Plans ( <b>Environmental Statement Figures 8.18.1 to 8.18.3 [WB6.4.8.18.1_A to WB6.4.8.18.3_A]</b> ) to be submitted at at Deadline [1], the extent of vegetation removal in sufficient detail to enable this matter to be clarified during the examination. <b>6.3.14.1_A Environmental Statement - Appendix 14.1 Transport Assessment Revision A [EN010132/EX1/WB6.3.14.1_A]</b> identifies some localised areas of hedge removal and instances of trimming back. The Applicant will verify within <b>Hedgerow Removal Plans [EN010132/EX1/WB7.3_A]</b> , which will be submitted at Deadline 1, as to the extent of vegetation removal and the correlation with <b>6.3.14.1_A Environmental Statement - Appendix 14.1 Transport Assessment Revision A [EN010132/EX1/WB6.3.14.1_A]</b> .

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>A comprehensive package of mitigation has been provided, in tandem with embedded mitigation established through the ecologically sensitive design of the Scheme (such as the wide buffering of all field boundaries and the use of existing hedgerow gaps for accesses).</p> <p>These measures are further detailed within <b>7.17 Outline Ecological Protection and Mitigation Strategy [APP-326]</b> (as secured by Requirement 8 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>) and <b>7.3_A Outline Landscape and Ecological Management Plan Revision A [EN010132/EX1/WB7.3_A]</b> (as secured by Requirement 7 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>) which will ensure that all identified impacts are minimised as far as possible on existing trees, hedgerows and other habitats.</p> <p>In many cases, the reversion from intensive agriculture to pasture or meadow grassland with additional hedgerow, scrub, tree and wetland habitat creation will bring about positive effects for wildlife. In particular, terrestrial and aquatic invertebrates, botanical diversity, small mammals and many species of bird all stand to benefit.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				In this way, a substantive net gain for biodiversity will be achieved (see <b>6.3.9.12 ES Appendix 9.12 Biodiversity Net Gain Report [APP-088]</b> ), predominantly through the creation of extensive low-input grassland resulting in a net gain of 86.80% in habitat units, but also several new ponds and wetland habitat parcels resulting in a net gain of 33.25% in river units, and the planting of several kilometres of species-rich hedgerow resulting in a net gain of 54.71% in hedgerow units.
LCC-28	Landscape and Visual Impact Transport and Access	Assessment of Highway Impacts in LVIA	"The wider highways elements of the scheme do not appear to be fully considered in the LVIA beyond increased traffic during construction phases, despite the potential adverse effects on the rural landscape these may have, including vegetation loss, urbanisation or visual amenity through any required improvements"	<p>The conclusions on the likely significant impacts and effects for the landscape receptors are set out within Section 8.7 of <b>6.2.8 Environmental Statement - Chapter 8_Landscape and Visual Impact Assessment [APP-046]</b>. Wherever feasible, construction vehicle access to the Site utilises existing highways and associated access points. In certain instances, minor vegetation removal may be necessary to accommodate the vehicle's swept path and ensure visibility. With abnormal loads, there is no vegetation removal required only minor pruning.</p> <p>In certain locations where existing accesses do not exist, some very minor hedgerow removal will be necessary to accommodate the access roads between fields, land parcels and solar panel</p>



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>areas. Hedgerows to be removed are set out in <b>Hedgerow Removal Plans [EN010132/EX1/WB7.3_A]</b>. This removal will involve only very short sections of hedgerow to accommodate internal access roads and will not involve loss of trees, in particular trees protected under any Tree Preservation Orders (TPOs).</p>
LCC-29	<p>Ecology and Biodiversity</p> <p>Landscape and Visual Impact</p> <p>Transport and Access</p>	Landscape and Ecological Management Strategy	<p>"The proposal would evidently deliver landscape and ecological improvements through mitigation areas and planting. However, this will be dependent upon the information set out in the Landscape and Ecological Management Plan Outline Plan and Landscape and Ecology Mitigation &amp; Enhancement Plans (Figures 8.18.1 to 8.18.3), which should be further explored, and assume would be refined at the detailed design stages."</p>	<p>The proposals for Embedded Mitigation are set out within Section 8.6 of <b>6.2.8 Environmental Statement - Chapter 8_Landscape and Visual Impact Assessment [APP-046]</b>, <b>6.3.8.2 Environmental Statement - Appendix 8.2 Assessment of Potential Landscape Effects [APP-073]</b> and <b>6.3.8.3 Environmental Statement - Appendix 8.3 Assessment of Potential Visual Effects [APP-074]</b> The delivery of landscape and ecology improvements through mitigation areas and planting is set out within <b>7.3_A Outline Landscape and Ecological Management Plan Revision A [EN010132/EX1/WB7.3_A]</b>. Requirement 7 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> secures the production of a detailed Landscape and Ecological Management Plan. Mitigation, including offsets and planting, has been proposed to address and minimise adverse effects on the character of the landscape. This is in accordance</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				with the methodology agreed in consultation with LCC at LVIA Workshops as part of pre-application consultation and engagement on the LVIA, see Section 8.2 (paras. 8.2.1 to 8.2.11 <b>[APP-046]</b> ). The mitigation is also in line with the hierarchy of approach advocated by the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition and matters agreed with LCC at the series of workshops set out in <b>6.3.8.4 Environmental Statement - Appendix 8.4 Consultation [APP-075]</b> .
LCC-30	Other Environmental Matters (Public Health / Major Accidents and Disasters)	Battery Fire Safety	<p>"Having reviewed the Outline Battery Storage Safety Management Plan the Council is satisfied that the details meet the requirements the Council set out in Fire Safety Position statement issued at the pre-application stage of the process.</p> <p>However, without further specific details, e.g. detailed plans etc, the response is based very much on the details within the document and the Fire Safety Officer reserves the right to add or amend these initial observations as more specific details of the proposed strategy to tackle a battery storage fire and detailed layout plans become available. This includes any requirement for Hazardous Substance Consent for the battery storage facility if this is considered necessary to be included in the Development Consent Order process."</p>	<p>The Applicant acknowledges the Council's position and is currently negotiating a Statement of Common Ground with Lincolnshire County Council (on behalf of Lincolnshire Fire and Rescue Service) <b>[EN010132/EX1/WB8.3.1]</b>, the aim being to reach agreement that the level of detailed information provided during the Examination stage, is sufficient for the Fire Safety Officer to make suitable recommendations.</p> <p>The Applicant has submitted <b>7.9 Outline Battery Storage Safety Management Plan [APP-318]</b> and, through <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>, has secured in Requirement 6 of Schedule 2 that "Work No. 2 [the battery energy storage facility] must not commence until a battery storage safety</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				management plan has been submitted to and approved by the relevant planning authority."
LCC-31	Climate Change	Sustainability Benefits and Greenhouse Gas Emissions	"The Council will make comments on the conclusions reached in respect of sustainability benefits and contribution this makes to reducing greenhouse gas emissions in the Council's Local Impact Report [LIR] and written submissions."	The Applicant notes this comment.
LCC-32	Soils and Agriculture	Agricultural Land Use	The potential impacts on agricultural land both in respect of this scheme and cumulatively with other NSIP solar projects that are emerging/known about in Lincolnshire will be raised in the LIR and written submissions."	The Applicant notes this comment.
LCC-33	Socio-Economics, Tourism and Recreation	Mitigation Measures	"Based on the Economic impacts section of the Socio Economic chapter, from a Growth perspective, what is assessed, and the mitigation measures proposed appear reasonable."	The Applicant notes this comment.
LCC-34	Socio-Economics, Tourism and Recreation Energy Need Principle of Development	Benefits to Local Community	"Although what is included in the Environmental Statement looks reasonable, the Council would expect appropriate energy related benefits to the local communities and economy provided and the Council would welcome the opportunity to explore these through the examination."	Whilst not a direct local benefit, there is benefit to all UK citizens from the UK producing more clean, renewable electricity, in terms of affordability, decarbonisation of the domestic energy supply and energy security. This is examined and demonstrated further in <b>7.11 Statement of Need [APP-320]</b> .  <b>6.2.10 Environmental Statement Chapter 10 Hydrology, Flood Risk and Drainage [APP-048]</b> sets out the economic benefits of solar energy. Section 10.2 shows how increasing capacities of

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>solar generation will reduce the price of power for UK consumers. Figure 10.3 draws on UK Government analysis which shows that large scale solar, already being highly competitive against current conventional and renewable generation costs, is predicted to retain a cost advantage for the decades ahead.</p> <p>In terms of the Scheme's benefits to the local community, section 5 of <b>7.10 Outline Skills Supply Chain and Employment Plan [APP-319]</b> demonstrates what additional measures are being pursued as part of the Scheme to provide local economic benefits. These include providing additional skills training (see paragraphs 5.2.1 to 5.2.12), maximising local recruitment and enhancing opportunities for local procurement (see paragraphs 5.3.1 to 5.4.6). A Skills, Supply Chain and Employment Plan is secured through Requirement 20 in Schedule 2 of the <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p> <p>The Applicant is committed to providing a Community Benefit Fund – see paragraph 4.8.1 of <b>C7.5 Planning Statement [APP-341]</b>. This fund will be available for community-based benefits such as (but not limited to) community-led energy related projects.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
LCC-35	Other Environmental Matters (Public Health)	Public Health	"The Council will make any relevant public health comments through the LIR."	The Applicant notes this comment.
LCC-36	Principle of Development	Draft DCO	"At this stage the Council reserves its position on the relevant parts of the draft DCO including the proposed requirements which are likely to be needed to be amended or added to at the examination progresses. The Council wishes to participate in any Issue Specific Hearing in relation to the drafting of the DCO."	The Applicant notes this comment.
LCC-37	General Socio-Economics, Tourism and Recreation	Cumulative Effects of RAF Scampton	"Whilst details are still emerging, the Council wishes to draw attention to the anticipated use of RAF Scampton as a detention/dispersal facility for asylum seekers. RAF Scampton is relatively close to the West Burton site and therefore consideration needs to be given to the cumulative impacts associated with the use of the base for asylum seekers. The base is expected to be used from August 2023 for this purpose and so by the time the examination commences much more detail will be available to enable a cumulative assessment to take into account this emerging development."	As a result of the lack of available information at the time of the DCO Application being made, cumulative effects from the use of RAF Scampton to accommodate asylum seekers have not been included in the assessment of cumulative effects in Section 18.10 of <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b> . The Applicant nonetheless notes this comment and will continue to work proactively to ensure cumulative effects from the development at RAF Scampton are captured in the relevant sections of the Environmental Statement as and when suitable information is published.
LCC-38	General	Procedural Matters Relating to Overlapping	"The Council wishes to draw to the attention of the Planning Inspectorate and the Examining Authority the unprecedented number of DCO	The Applicant notes this comment and will continue to work positively and proactively with the Council.

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
		DCO Examinations	projects that are currently on-going in Lincolnshire which may result in six other examinations taking place in the County at the same time as this one. In addition a second wave of potential DCO projects are now commencing their pre-application stage. The Council wishes to be fully involved in all these examinations but has only limited resources and personnel and therefore requests that careful and sensitive attention is given to the examination timetables to ensure that hearings and deadline dates take into account those of other project that will be under examination at the same time."	
LCC-39	General Landscape and Visual Impact Transport and Access	Cumulative or Joint Examination	"Related to this is the expectation that three examinations will be taking place simultaneously for other solar projects in this same geographical area as West Burton. The Council's initial landscape observations, set out above, already notes the significant cumulative impact of these projects in the landscape. The Council has repeatedly flagged up to the Planning Inspectorate that it would be beneficial for a method of hearing evidence related to cumulative impacts from these projects, which includes landscape and highway impacts at the very least, to be identified in advance of the first examination. However, to date this has not occurred. Therefore, unless such a mechanism is set out in advance of the preliminary meeting, the	The Applicant notes this comment.

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			Council will make submissions at the meeting of its position on this. The Council's preferred approach is to ensure that the cumulative impacts are heard in a holistic way rather than individually through single examinations."	
LCC-40	General	Examination Period	"In conclusion the Council looks forward to working with the applicant and the Planning Inspectorate as the project progresses through the DCO process and welcomes the opportunity to comment on matters of detail throughout the examination".	The Applicant notes this comment and will continue to work positively and proactively with the Council.

**Table 2.1.2: Applicant's Response to Lincolnshire County Council [RR-188]**

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
WLDC-01	General	Scope of Representation Made	<p>WLDC will provide a detailed case on the impact of the applications within its Local Impact Report (LIR). The LIR will set out the views of WLDC following an opportunity to appraise the application in detail, particularly with regard to cumulative impacts with other NSIP applications nearby.</p> <p>A full response setting out the technical assessment of the application, include policy compliance and planning balance, will be reported within WLDC's Written Representation (WR). The WR will include assessments on the</p>	The Applicant notes this comment and awaits the detailed case that is to be presented within the Council's Local Impact Report (LIR).

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>individual impacts of the West Burton Solar Project, along with the cumulative impacts with Cottam Solar Project and Gate Burton Energy Park applications. WLDC considers that the cumulative impacts of all three projects will have significant impacts upon communities and these impacts should be a central focus of the examination of all the applications.</p> <p>This RR therefore sets out the key issues that WLDC consider to be important and relevant for the examination phase of the application to consider."</p>	
WLDC-02	General	Cumulative or Joint Examination	<p>"Whilst this RR relates to the West Burton Solar Project, applications for development consent under the PA2008 have also been submitted nearby for the Cottam Solar Project and Gate Burton Energy Park solar photovoltaic generating stations.</p> <p>West Burton Energy Project was 'accepted' for examination on 18th April 2023, following the 'acceptance' of the Cottam Solar Project on 10th February 2023 and Gate Burton on 22nd February 2023. Whilst the Cottam Solar Project application remains in its 'Pre-Examination' phase, Gate Burton has been subject to a Rule 6 letter, with a Preliminary Meeting scheduled for 4th July 2023.</p>	<p>The Applicant notes this comment. This response will be updated following the preliminary meeting where these matters will be discussed.</p>



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>Whilst Gate Burton will commence its examination phase ahead of Cottam Solar Project and West Burton Energy Project, it is inherent that all three DCO application will be examined in parallel, with recommendations being made to the Secretary of State for determination on similar timescales. The consequences of this parallel examination are that cumulative impacts between each project will be considered in isolation through separate processes. WLDC has expressed in its Relevant Representations to the other two applications that consideration should be given to holding joint hearings on cumulative matters to avoid duplication across the three examinations. With Gate Burton Energy Park commencing examination prior to the other two applications, it appears that each application will be considered in isolation and an efficient way of considering cumulative effects is not being considered."</p>	
WLDC-03	General	Concurrent or Joint Examination Hearings	<p>"On a practical level, facilities for hearings within the West Lindsey District will be required for all three applications with overlapping examination programmes. Logistically this is very likely to prove problematic, especially if the examination programmes are not aligned to avoid hearing clashes. The holding of concurrent hearings and deadlines for three applications will also result in a significant challenge to ensure that members of</p>	<p>The Applicant notes this comment. This response will be updated following the preliminary meeting where these matters will be discussed.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>the public are able to understand and engage effectively. There is scope for misunderstanding if this examination phase is not managed in a clear and fair manner, potentially depriving members of the public of engaging and ensuring their specific views on each project are understood.</p> <p>Furthermore, as the host authority and an IP for all three applications, WLDC welcome an approach that enables it to carry out its duties in as effective and efficient manner as possible. An unmanaged overlap of examination programmes will result in WLDC likely to be placed in a position where hearing will be staggered, resulting in significant resource issues to meet deadlines whilst preparing for, and attending, hearings.</p> <p>WLDC therefore requests that the Planning Inspectorate works closely with WLDC to ensure that it has the ability to engage effectively in the logistical approach the examination of all three applications. WLDC strongly encourage the Examining Authority to utilise the use of virtual platforms when holding hearings to reduce the resourcing demands and enable flexibility."</p>	
WLDC-04	General	Policy framework and decision making	<p>"WLDC will set out its position on the compliance of the application with of the PA2008 for the purpose of decision making. The assessment and planning balance will be carried out with regard to inter alia:</p>	<p>The Applicant notes this comment and awaits a full response.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<ul style="list-style-type: none"> <li>• Relevant National Policy Statement(s);</li> <li>• Statutory development plan framework (inc. emerging development plans);</li> <li>• Published guidance and advice notes;</li> <li>• Representations from other parties.</li> </ul> <p>WLDC reserve the right to raise any further matter relating to compliance with any primary and secondary legislation following a detailed assessment of the application, and in response to matters that may arise during the examination process."</p>	
WLDC-05	General	Cumulative impacts	<p>"The cumulative impacts of West Burton Energy Park, with the Cottam Solar Project, Gate Burton Energy Park and the emerging Tillbridge Solar Project will be a key concern for WLDC. The scale of the projects, in isolation as well as cumulatively, will give rise to significant environmental impacts that will require significant scrutiny and assessment by WLDC and should be a key focus of the examination phase.</p> <p>The cumulative impacts of West Burton Energy Park with Cottam Solar Project and Gate Burton Energy Park are of particular importance as these projects are likely to be examined under the PA2008 concurrently. It is therefore essential that consistent information and evidence is presented at all three examinations to enable a fair and</p>	<p>The Applicant notes this comment and seeks to assure WLDC that a cumulative effects assessment has been prepared for the Application within <b>6.2.1-6.2.23 Environmental Statement [APP-039 to APP-061]</b>. Cumulative effects assessments for each topic are set out in each of the ES Chapters and include the assessment of the impacts of the Scheme cumulatively with the NSIPs identified by WLDC (Gate Burton Energy Park, West Burton Solar Project and Tillbridge Solar Project) (see paragraph 2.5.9 of <b>6.2.2 Environmental Statement - Chapter 2 EIA Process and Methodology [APP-040]</b>). The assessment has been undertaken in accordance with Schedule 4 of the 2017 EIA Regulations and PINS Advice Note</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>consistent recommendation (and decision) to be made.</p> <p>Tillbridge Solar Project is expected to be submitted in Q4 2023, with more detailed project information becoming public prior to the West Burton Energy Park project being determined, including its 'acceptance' for examination. WLDCs view is that all current environmental information must be before a decision maker at the point a decision is made, and the emergence of the Tillbridge Solar Project should be accounted for in cumulative assessments.</p> <p>Cumulative impacts of concern will relate to construction, operational and decommissioning impacts across a range of matters including, inter alia, landscape and visual effects, land use (loss of agricultural land), public access and recreation, noise, traffic and transport, cultural heritage and ecology."</p>	17. The mitigation measures set out across the ES therefore account for anticipated cumulative effects.
WLDC-06	General	Scope of Relevant Representation	<p>"WLDC will fully explore the impacts of the West Burton Energy Park in its LIR and WR following a detailed appraisal of the application. Without prejudice to matters that are identified following a detailed assessment, WLDC expect the following matters to be scrutinised in detail through the examination phase:</p> <ul style="list-style-type: none"> <li>• Compliance with relevant legislation;</li> </ul>	The Applicant notes this comment and awaits a full response.

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<ul style="list-style-type: none"> <li>• Policy compliance and planning balance;</li> <li>• Project design principles</li> <li>• Landscape and visual effects (including lighting impacts and glint and glare);</li> <li>• Effects on residential amenity;</li> <li>• Effects on public amenity and recreation;</li> <li>• Ecology and biodiversity impacts (including Biodiversity Net Gain);</li> <li>• Cultural heritage;</li> <li>• Traffic and transport;</li> <li>• Noise impacts;</li> <li>• Air Quality impacts;</li> <li>• Land use and loss of agricultural land (including soils) impacts;</li> <li>• Hydrology and flood risk; and</li> <li>• Safety and human health.</li> </ul> <p>WLDC will also express its judgement on the 'planning balance', assessing all of the schemes benefits and disbenefits against the relevant policy framework to provide an overall conclusion on the acceptability of the application. In addition to the submission of a WR and LIR, WLDC understands its role in the examination process to respond to written questions directed to them</p>	

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			and the requirement to participate in Hearings as scheduled by the Examining Authority."	
WLDC-07	Principle of Development	Mitigation and Control Mechanisms	<p>"A key concern for WLDC will be, should the West Burton Energy Park be consented, the mechanisms that will mitigate and control the impacts of the scheme. These concerns will extend beyond mitigation for the application itself, to the cumulative impacts with other projects. Such impacts will be significant and experienced during the construction, operation and decommissioning stages.</p> <p>WLDC will also seek to ensure that all impacts on the environment and communities are mitigated and controlled and not solely those deemed significant in terms of the Environmental Impact Assessment. WLDC expect the applicant to deliver measures that mitigate all impacts to ensure that the overarching impact of the project is mitigated as far as possible."</p>	<p>The Applicant notes this comment and seeks to assure WLDC that a cumulative effects assessment has been prepared for the Application within <b>6.2.1-6.2.23 Environmental Statement [APP-039 to APP-061]</b>. Cumulative effects assessments for each topic are set out in each of the ES Chapters and include the assessment of the impacts of the Scheme cumulatively with the NSIPs identified by WLDC (Gate Burton Energy Park, West Burton Solar Project and Tillbridge Solar Project) (see paragraph 2.5.9 of <b>6.2.2 Environmental Statement - Chapter 2 EIA Process and Methodology [APP-040]</b>. The assessment has been undertaken in accordance with Schedule 4 of the 2017 EIA Regulations and PINS Advice Note 17. The mitigation measures set out across the ES therefore account for anticipated cumulative effects.</p> <p><b>6.2.22 Environmental Statement - Chapter 22 Summary of Mitigation [APP-060]</b> provides a summarised table of the mitigation and enhancement measures proposed in the ES, including those that seek to mitigate or enhance effects that are not significant. The table <b>[APP-060]</b> furthermore sets out which control document, and under which requirement in</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> , the proposed mitigation and enhancement measure are secured by.
WLDC-08	General	Control Documents and Project Collaboration	<p>"WLDC will expect to see well developed codes of practice and control documents prior to the determination of the DCO applications to ensure that the impacts in solus and cumulatively with other projects is controlled at that decision stage. Due to the determination of the three project on broadly the same timeline, the acceptability of each one will be dependent on achieving effective and co-ordinated controls for each one.</p> <p>WLDC will also seek clarification on the mechanisms in place to ensure the retention and maintenance of mitigation post-decommissioning."</p>	<p>The Applicant notes this comment and seeks to assure WLDC that the codes of practice and control documents submitted in support of the DCO Application to manage and mitigate the effects of the Scheme (including but not limited to: <b>7.1_A Outline Construction Environmental Management Plan Revision A [EN010132/EX1/WB7.1_A]</b>; <b>7.14_A Outline Operational Environmental Management Plan Revision A [EN010132/EX1/WB7.14_A]</b>; and <b>7.2 Outline Decommissioning Statement [APP-310]</b>) are secured through their respective Requirements in Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p> <p>The Applicant is also further committed to contributing to a <b>Statement of Common Ground [EN01032/EX1/WB8.3.2]</b>, and <b>WB8.1.9_A Joint Interrelationships with other Nationally Significant Infrastructure Projects [EN010132/EX1/WB8.1.9_A]</b> report with the applicants of the Cottam Solar Project, Gate Burton Energy Park, and Tillbridge Solar Park. These documents will help to provide the</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				Examining Authorities across these projects to assess the level of cumulative effect and the measures to which the respective applicants are controlling these impacts in solus and cooperatively.
WLDC-09	Principle of Development (DCO)	Draft DCO	<p>"WLDC will provide detailed comments on the draft DCO. The key issues for focus will include:</p> <ul style="list-style-type: none"> <li>• The scope of the authorised development;</li> <li>• The schedule and drafting of 'requirements'.</li> </ul> <p>WLDC expect their views on the drafting and approvals process for DCO requirements in particular to be given significant weight in their role of ensuring that the impacts upon local environment and communities are minimised, and as an approving and enforcement authority."</p>	The Applicant notes this comment and awaits the Council's detailed comments.
WLDC-10	General	Summary of RR	<p>As the host authority and IP for the project WLDC will be taking a full and active role in the examination of DCO application.</p> <p>Due to the unique circumstances of three DCO applications for solar photovoltaic generation stations likely to be examined concurrently, WLDCs initial key concern relates to the logistics as to how the Planning Inspectorate will approach the examination phase. The projects represent large scale development that will have significant impacts on the environment and local communities both individually and cumulatively.</p>	<p>The Applicant notes this comment and awaits a full response.</p> <p>The Applicant is cognisant of the need to ensure concurrent examinations of the Scheme and nearby NSIPs are held in a manner than is conducive to the suitable examination of independent and cumulative matters. The Applicant has therefore made comments on the draft examination timetable for this Scheme through the <b>Applicant's Procedural Deadline A Cover Letter [AS-XXX]</b>, and through oral and</p>



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>WLDC considers that the approach to the examination of the applications must allow for efficiency of resources, transparency and fairness. This also extends to the examination programme for each application in terms of the scheduling of hearings aligning, not only to allow for effective engagement by WLDC but also in terms of Hearing venue locations.</p> <p>WLDC will undertake a thorough review and assessment of the application document and provide a full response in a WR and LIR. Without prejudice to this assessment, the key matters identified by WLDC that it considers should be subject of specific focus during the examination include:</p> <ul style="list-style-type: none"> <li>• Policy framework and decision making;</li> <li>• Cumulative impacts;</li> <li>• Project specific impacts;</li> <li>• Mitigation and control mechanisms; and</li> <li>• DCO scope, provisions and requirements (including enforcement).</li> </ul> <p>WLDC looks forward to engaging positively in the examination of the West Burton Energy Park project and will continue to work with the applicants to ensure the process is robust and efficient</p>	<p>written representations made to the Preliminary Meeting held 7<sup>th</sup> September 2023.</p> <p>The Applicant furthermore will continue to work positively and proactively with the Council throughout the examination process.</p>



**Table 2.1.3: Applicant's Response to North Kesteven District Council [RR-243]**

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
NKDC-01	Soils and Agriculture	Cumulative Effects	"The District Council wishes to provide comments in relation to Chapter 19: Soils and Agriculture of the ES, noting that the detailed ALC survey of the agricultural soil survey area found agricultural land in Grades 1, 2, 3a and 3b. This will include a review of the cumulative effects of loss of BMV land alongside other registered solar NSIP schemes in Central Lincolnshire including those within North Kesteven District."	<p>The Applicant notes this comment and awaits NKDC's detailed representations.</p> <p>A cumulative effects assessment has been prepared for the Application within <b>6.2.1-6.2.23 Environmental Statement [APP-039 to APP-061]</b>. Cumulative effects assessments for each topic are set out in each of the ES Chapters and include the assessment of the impacts of the Scheme cumulatively. Those identified NSIPs relevant to loss of BMV are set out in paragraph 19.11.2 of <b>6.2.19 Environmental Statement - Chapter 19 Soils and Agriculture [APP-057]</b>.</p> <p>The assessment has been undertaken in accordance with Schedule 4 of the 2017 EIA Regulations and PINS Advice Note 17. The mitigation measures set out across the ES therefore account for anticipated cumulative effects.</p>

## 2.2 The Applicant's Responses to Statutory Consultees, International Agencies, Undertakers, and Elected Representatives with whom the Applicant has Undertaken a Statement of Common Ground

**Table 2.2.1: Applicant's Response to Historic England [RR-123]**

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
HE-01	Cultural Heritage	Introduction	"Historic England The Historic Buildings and Monuments Commission for England (HBMCE) is better known as Historic England, and we are the Government's adviser on all aspects of the historic environment in England, including historic buildings and areas, archaeology and historic landscapes. We have a duty to promote conservation, public understanding and enjoyment of the historic environment. We are an executive Non-Departmental public body and we answer to Parliament through the Secretary of State for Culture, Media and Sport (DCMS). Proposal Cottam Solar Project. Solar photovoltaic array and electrical storage and connection infrastructure, with a generation capacity of greater than 50 MW."	The Applicant notes this comment.
HE-02	Cultural Heritage	Designated heritage assets and earthworks	"Historic England is minded to oppose the grant of DCO for this scheme on the basis of avoidable harm to the significance of a scheduled monument designated by the Secretary of State under S1 of the 1979 Ancient Monuments and Archaeological Areas Act (as amended) viz Medieval bishop's palace and deer park, Stow	The Applicant respectfully disagrees with the Historic England's conclusion that the impact of the proposed installation within the former deer park represents substantial harm (in NPS/SPPF terms) to the significance of the monument through loss of its character as a bounded architectural space.

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>Park (NHLE 1019229). The impact of the proposed installation within the former deer park represents substantial harm (in NPS/SPPF terms) to the significance of the monument through loss of its character as a bounded architectural space. This represents a significant environmental impact (major harmful) in EIA terms."</p>	<p>The Medieval bishop's palace and deer park, Stow Park Scheduled Monument (1019229) is composed of three physically separate elements of the former medieval deer park. Although the applicant acknowledges HE's view that the deer park forms an architectural space and that there is an associated historical spatial relationship between the three sections of the Scheduled Monument, the Applicant considers that the various Scheduled areas can only be experienced individually. Post-medieval and modern interventions have significantly altered the character of the former medieval park preventing it from being experienced as a continuous enclosed space. Consequently, without the aid of aerial imagery or historical documentation it is difficult to collectively experience the surviving vestiges of the deer park in the modern landscape, and get a sense of a bounded space.</p> <p>Furthermore, as stated in Paragraph 3.3.39 of the <b>6.3.13.5 Environmental Statement - Appendix 13.5 Heritage Statement [APP-117 to APP-119]</b>, the Applicant considers that the reversible nature of the Scheme, which will allow existing landscape features to remain in situ, means that the legibility of the former deer park as interpreted from cartographic and other documentary sources, will still remain unaffected in terms of their contribution to the understanding of the</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>Scheduled Monument's historical and functional association in consideration of setting.</p> <p>Consequently, the Applicant considers that the Scheme would cause less than substantial harm (at the upper end) to the designated heritage assets and that use of fixed shorter panels, as incorporated into the design of the Scheme, is sufficient mitigation (Paragraph 3.4.9 [APP-117 to APP-119]).</p>
HE-03	Cultural Heritage	Scheduled assets	<p>"In EIA scoping advice and PEIR comments we highlighted the setting of the following assets (without prejudice to other issues that might emerge through assessment), viz the scheduled Broxholme medieval settlement and cultivation remains (NHLE 1016797), the scheduled Deserted village of North Ingleby (NHLE 1003570) and the scheduled Medieval bishop's palace and deer park, Stow Park (NHLE 1019229)."</p>	<p>The Applicant considers that they have undertaken sufficient engagement and consultation with Historic England enabling a clear identification of potential heritage sensitivities and designated heritage assets that have the potential to be impacted by the Scheme.</p> <p>A detailed assessment of the impact of the Scheme on designated heritage assets—including Broxholme medieval settlement and cultivation remains (NHLE 1016797), the scheduled Deserted village of North Ingleby (NHLE 1003570) and the scheduled Medieval bishop's palace and deer park, Stow Park (NHLE 1019229), is provided in <b>6.3.13.5 Environmental Statement - Appendix 13.5 Heritage Statement [APP-117 to APP-119]</b>.</p>
HE-04	Cultural Heritage	Significance of scheduled assets	<p>"Stow Park, the Medieval Bishop's Palace site and deer park is set on the Roman road from Lincoln to Doncaster a key line of communication</p>	<p>Paragraphs 3.3.35 and 3.3.36 of <b>6.3.13.5 Environmental Statement - Appendix 13.5 Heritage Statement [APP-117 to APP-119]</b></p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>between the Episcopal sees of Lincoln and York. Deer parks and palace / lodges offered a place for retreat, rest and entertainment of social and political peers, clients and Royal guests and were hence key spaces for the performance of the elite status of Bishops in the medieval landscape. The deer park is an architectural space, a place cut out from the overlapping and complex the medieval landscape, a place where rights were monopolised - in this instance the Bishop. At the heart of the significance of a medieval deer park is not just the functional containment and protection of deer and other resources but also their articulation as a space apart – a space imparked. This central aspect of significance would be profoundly compromised by the loss both of its rural character through the installation of panels and by it being subsumed into a new landscape of solar generation.</p>	<p>highlight the negative effect that has been caused by post-medieval and early modern agricultural activity. Land within the deer park has been transformed from a compartmentalised high status medieval parkland containing areas of managed woodland and grassland to a landscape characterised by enclosed fields used for agricultural purposes. The character and appearance of the land within the historical boundaries of the deer park is indistinguishable from the agricultural land outside of its boundaries and does not contribute to the understanding or appreciation of its former medieval deer park function. The site of the Bishop's Palace presently contains the derelict remains of Moat Farm. Consequently, the general character of the landscape within the former deer park relates to a post-medieval or later landscape and fails to embody a sense of the earlier medieval deer park.</p>
HE-05	Cultural Heritage	Scheduled Monument	<p>"The railway and associate ex MOD petroleum storage facility represented significant change to the former deer park by bisecting the site, but they have not fundamentally compromised the ability to experience the park as a space defined in the landscape. As one walks from the moated site at the north to the raised ground occupied by the farm buildings at the south of the park and then crosses the railway past the fuel depot to</p>	<p>As stated in Paragraph 3.3.34 of the Heritage Statement (<b>6.3.13.5 Environmental Statement - Appendix 13.5 Heritage Statement [APP-117 to APP-119]</b>), the Applicant acknowledges that the Scheme has the potential to physically and visually isolate the three Scheduled areas that make up the medieval bishop's palace and deer park Scheduled Monument. However as identified in Paragraph 3.3.35 of the Heritage</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>the farmstead and the south western part of the park one can still gain a sense of this as a bounded space."</p>	<p>Statement <b>[APP-117 to APP-119]</b>, the Applicant considers that the relationship between the three surviving components of the deer park has already been adversely compromised. Modern activity including the ex MOD petroleum storage facility and a railway line completely bisect the deer park, resulting in there being no intervisibility between the west park pale, and the Bishop's Palace and east park pale. While intervisibility exists between the Bishop's Palace and the east park pale, their historical relationship can only be experienced through the fossilisation of the parkland boundary by later mature trees and hedgerow. Conversely, although this intervisibility exists, the Applicant highlights that the overall legibility of the northern section of the deer park is problematic. Desk-based research has demonstrated that there are several possibilities for the locations of the pales in the north of the deer park, which would have each joined the east and west park pales to the Bishop's Palace (Paragraphs 3.2.27-3.2.48 <b>[APP-117 to APP-119]</b>).</p>
HE-06	Cultural Heritage	Scheduled Monument	<p>"We made a site visit with the applicants' consultants on 13th May 2022 to West Burton 1, 2 and 3 to initially assess impacts upon the Stow Park, Ingleby and Broxholme Scheduled Monuments. With regard to impacts upon those specific assets Historic England would have no</p>	<p>The Applicant notes this comment.</p>



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			objection to the proposals within West Burton 1 and 2 and noted that the design proposals at West Burton 2 had taken into account the setting of the Ingleby Scheduled Monument, by removing areas adjacent to the Scheduled Monument from any proposed development."	
HE-07	Cultural Heritage	Setting impacts	<p>"On the basis of the indicative layout plans for panels within the pale (park boundary) of Stow Park we are as noted in the PEIR minded to object to installation of any part of the development within the former deer park (as defined by the lines of the scheduled Park Pale and its former course). Our concerns are focussed upon setting impacts upon the significance of the medieval bishop's palace and deer park SM 1019229 and we consider that the proposed sections of solar array sited within the medieval deer park at Stow would constitute substantial harm to the significance of the scheduled monument. We recommend that part of the scheme within the historic extent of Stow Park be deleted from the scheme as it presents avoidable and unjustified harm to the significance of a nationally important designated heritage asset."</p>	<p>The Applicant respectfully disagrees with Historic England's belief that the solar array within the medieval deer park would constitute substantial harm to the significance of the three areas of scheduled monument.</p> <p>The Applicant considers that post-medieval and modern land use has already substantially altered the setting of the Scheduled Monument, so that it no longer can be experienced as an imparked high status medieval space. Instead, the three surviving components of the deer park lie isolated within the modern landscape. The character and appearance of land within the former deer park is homogenous to agricultural land that historically lay outside the former deer park boundaries, being defined by post medieval land enclosure.</p> <p>The Applicant also highlights that the temporary and reversible nature of the Scheme will enable the preservation in situ of existing landscape features. This means the legibility of the former deer park, as interpreted from cartographic and</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>other documentary sources, will be unaffected by the Scheme, which the Applicant considers plays an important contribution to the understanding of the Scheduled Monument's historical and functional association in consideration of setting.</p> <p>Consequently, the Applicant considers that the Scheme will cause less than substantial harm (at the upper end) to the setting of the Scheduled Monument, and that Historic England's request to remove all panels from within the historical boundary of the deer park would be disproportionately detrimental to the Scheme proposals. As stated in Paragraph 3.4.9 of <b>6.3.13.5 Environmental Statement - Appendix 13.5 Heritage Statement [APP-117 to APP-119]</b>, the Applicant considers that the harm to the setting of the Scheduled Monument is an environmental effect that the Planning Inspectorate should weigh against the substantial benefits of the Scheme.</p>
HE-08	Cultural Heritage	Buried Archaeological Remains	<p>"With regards to buried archaeological remains it is important that risk of avoidable / unmitigated damage to sensitive remains is well managed in proportion to their importance. This can be achieved through layout, deployment of green space and construction options for cabling and panel mounting etc. Archaeological risks can thus be well addressed, but only if there is a sound</p>	<p>The proposed mitigation strategy (see <b>6.3.13.7 Environmental Statement - Appendix 13.7 Archaeological Mitigation WSI [APP-122]</b>) aims to remove risk to buried archaeological remains where possible through mitigation by design in the form of non-intrusive concrete ground anchors (see paragraph 7.2 <b>[APP-122]</b>). Where intrusive works are unavoidable that could impact upon identified archaeological remains,</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>understanding of where archaeological sensitivity and importance lies across the site.”</p>	<p>mitigation by record is proposed in the form of ‘strip, map and sample’ (see paragraphs 7.5 [APP-122]). The type of proposed mitigation has been informed by the extensive previous survey/excavation which has provided crucial information regarding the character of buried archaeological remains and their archaeological importance with consideration to the impact caused by various elements of the Scheme (see paragraph 1.1.2 [APP-122]). The WSI is secured by Requirement 12 of Schedule 2 to <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p> <p>Furthermore, <b>7.6 Design and Access Statement [APP-314 to APP-315]</b> demonstrates how cultural heritage has influenced the design of the Scheme, with heritage-based design measures set out in Section 3.7 therein. Design Objective 5 (para. 4.2.9 [APP-314]) is specific to ensuring the Scheme is developed sensitively with regard to heritage assets and their settings.</p>
HE-09	Cultural Heritage	Acceptability of evaluation	<p>“Sufficiency of field evaluation is vital because some features (such as for instance early medieval burial grounds or Roman high-status buildings) would be both of high importance and high sensitivity to the insertion of panel mounting piles. Discussion is continuing as regards the extent of archaeological evaluation and deployment of intrusive and non-intrusive</p>	<p>The Applicant confirms that discussions have taken place with the host local authorities and are ongoing regarding the extent of archaeological evaluation and related matters. The Applicant welcomes pragmatic and reasonable collaboration with Lincolnshire County Council's Historic Places Team (LHPT) and considers they have worked closely with LHPT to deliver</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			techniques, the reliance upon / complimentary nature of such techniques, and the timing thereof; all in the context of concerns around the management of archaeological and project risk. In the context of sufficiency of evaluation work we refer you in the first instance to the expertise of local authority archaeological advisors. It is they who will (should DCO be granted with appropriate requirements) advise upon the acceptability of written schemes of investigation (WSI) and their accordance with a robust overall archaeological strategy secured through DCO submission."	<p>fieldwork campaigns for the Scheme (through the agreement of WSIs and the various site visits and online meetings throughout 2022 and 2023).</p> <p>The Applicant is of the opinion that the extensive archaeological investigation works undertaken as part of the DCO application have been sufficient to inform the EIA process and to formulate an appropriate mitigation strategy, as set out in <b>6.3.13.7 Environmental Statement - Appendix 13.7 Archaeological Mitigation WSI [APP-122]</b>.</p> <p>The Applicant is keen to agree a proportionate strategy with all parties. If further trenching across the Scheme is deemed necessary, the Applicant considers that this should be undertaken post-determination of the DCO.</p>
HE-10	Cultural Heritage	Cumulative impacts	"Combined cable connection corridors with other Solar NSIP have the potential to minimise cumulative impacts in archaeologically sensitive areas, which we would welcome."	The Applicant notes this comment and confirms that a shared cable corridor (specifically for the crossing of the River Trent) is an integral part of the Scheme's design.

**Table 2.2.2: Applicant's Response to National Highways [RR-232]**

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
NH-01	Transport and Access	Safeguarding Roads	"In relation to the West Burton Solar Project, our principal interest is in safeguarding the A46,	The Applicant notes this comment. A Statement of Common Ground is being negotiated with National Highways.

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			A160, and A180 trunk roads; and the M180 motorway."	
NH-02	Transport and Access	Strategic Road Network (SRN)	"Although the SRN is outside the Order Limits, it is understood that construction traffic will be routed via the A46, A160, and A180 trunk roads and the M180 motorway. As such, we reserve the right to make written representations if an impact of construction traffic on the SRN is identified, or if changes to the application are made which result in impacts to the SRN."	The Applicant notes this comment. A Statement of Common Ground is being negotiated with National Highways.

**Table 2.2.3: Applicant's Response to Environment Agency [RR-090]**

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
EA-01	General	Introduction	"Below is a summary of our relevant representations. We have sent an email with our detailed comments to WestBurtonSolarProject@planninginspectorate.gov.uk which should be published alongside this outline. We object to any acquisition of land or rights in relation to the Environment Agency's land interests until we have had a proper opportunity to assess the potential effects of the acquisitions sought by the applicant on our ability to carry out our operations. We would not agree to disapply the Environmental Permitting (England and Wales) Regulations 2016 in their entirety, we would only accept disapplication of the requirement for a flood risk activity permit."	The Applicant notes this comment.

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
EA-02	Principle of Development (DCO)	Draft DCO: Protective Provisions	"We have reviewed the proposed protective provisions (Schedule 19, Part 9) for the protection of the Environment Agency. We do not accept the current wording."	The Applicant notes this comment and is working with the EA in order to agree the wording of protective provisions for the benefit of the EA.
EA-03	Ecology and Biodiversity Hydrology, Flood Risk and Drainage	Request for Further Assessment	"Further assessment and/or information will be required on the following to enable the examining authority to make an informed decision: On ecology and biodiversity, we require additional information on filamentous algae in ditches so that we may comment on the target Water Framework Directive waterbody status."	The Applicant confirms that <b>7.19_A Water Framework Directive Assessment Revision A [EN010132/EX1/WB7.19_A]</b> will be updated to consider potential physical impacts to the river that could detrimentally affect riverbank structure and substrate of the riverbed.
EA-04	Hydrology, Flood Risk and Drainage	River Till Flood Storage Area	"On hydrology, flood risk and drainage we have asked for a map of the River Till Flood Storage Area outline overlain onto the illustrative site layout plan and further clarity on the percentage of flood zone 3 that will contain photovoltaic panels."	The Applicant confirms that the illustrative site layout plan <b>6.3.10.5 Environmental Statement - Appendix 10.5 FRA DS West Burton 3 [APP-093]</b> will be updated to include the River Till Flood Storage Area (FSA).
EA-05	Ground Conditions	CEMP	"On ground condition and contamination, we have outlined the detail we would expect to see in the Construction Environment Management Plan."	This comment has been addressed in the response to EA-25.
EA-06	Principle of Development (DCO)	Requirements	"We have concerns on consultation timescales and would ask these are extended in line with our comments in 7.5-7.7."	The Applicant notes this comment and has responded to the detailed comments set out at EA-33.
EA-07	General	The EA's Role	"The Environment Agency is an executive non-departmental public body, established under the Environment Act 1995.  We are an adviser to Government with principal aims to protect and improve the environment, and to	The Applicant notes this comment.

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>promote sustainable development. We play a central role in delivering the environmental priorities of central government through our functions and roles.</p> <p>We are also an adviser to local decision makers in our role as a statutory consultee in respect of particular types of development, as listed in Schedule 4 of the Development Management Procedure Order 2015.</p> <p>For the purposes of this Development Consent Order (DCO), we are a statutory interested party.</p> <p>We take action to conserve and secure proper use of water resources, preserve and improve the quality of rivers, estuaries and coastal waters and groundwaters through pollution control powers and regulating discharge consents. We have a duty to implement the Water Framework Directive (WFD).</p> <p>We have regulatory powers in respect of waste management and remediation of contaminated land designated as special sites. We also encourage remediation of land contamination through the planning process.</p> <p>We are the principal flood risk management operating authority. We have the power (but not the legal obligation) to manage flood risk from designated main rivers and the sea. We are also responsible for increasing public awareness of flood risk, flood forecasting and warning and have a general supervisory duty for flood risk management. We also</p>	

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>have a strategic overview role for all flood and coastal erosion risk management.</p> <p>We have three main roles:</p> <ul style="list-style-type: none"> <li>• We are an <b>environmental regulator</b> – we take a risk-based approach and target our effort to maintain and improve environmental standards and to minimise unnecessary burdens on businesses. We issue a range of permits and consents.</li> <li>• We are an <b>environmental operator</b> – we are a national organisation that operates locally. We work with people and communities across England to protect and improve the environment in an integrated way. We provide a vital incident response capability.</li> <li>• We are an <b>environmental adviser</b> – we compile and assess the best available evidence and use this to report on the state of the environment. We use our own monitoring information and that of others to inform this activity. We provide technical information and advice to national and local governments to support their roles in policy and decision-making."</li> </ul>	
EA-08	General	The Scope of the Representation	"These relevant representations contain an overview of the project issues, which fall within our remit. They are given without prejudice to any future detailed	The Applicant notes this comment and has addressed each of the EA's comments in the rows below.



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>representations that we may make throughout the examination process. We may also have further representations to make if supplementary information becomes available in relation to the project.</p> <p>We have reviewed the DCO, Environmental Statement (ES) and supporting documents submitted as part of the above-mentioned application, which we received on the 18 April 2023. Our comments are presented below"</p>	
EA-09	Ecology and Biodiversity	Otter and Water Vole Survey	<p>"We would like to make the following comments in relation to the protection of ecology and biodiversity having reviewed the documents listed below:</p> <ul style="list-style-type: none"> <li>• Environmental Statement: Chapter 9: Ecology and Biodiversity (ref);</li> <li>• Otter and Water Vole Survey (ref);</li> <li>• Biodiversity Net Gain Report (ref);</li> </ul> <p>We welcome the recommendations in the Otter and Water Vole Survey. However, we would expect to see a best practice water vole survey completed for those watercourses directly impacted by culverting to get a better picture of local water vole populations."</p>	<p>The Applicant confirms that <b>7.17 Outline Ecological Protection and Mitigation Strategy [APP-326]</b> sets out the requirement for detailed survey of watercourses that are to be directly affected by the Scheme. This is secured through Requirement 8 of Schedule 2 to <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>. The OEPMS <b>[APP-326]</b> states under Section 5.6:</p> <p><i>'Particular attention will be paid to any habitat removal works affecting or within 30m of a watercourse for the potential presence of otters and water voles.</i></p> <p><i>All applicable habitat removal works will be preceded by an inspection of habitat at least 50m upstream and 50m downstream of the clearance extent to look for signs of these species and their sheltering sites. The inspection</i></p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p><i>will be carried out one month in advance of works commencing by a suitably qualified ecologist.'</i></p> <p>The surveys will follow the methodologies outlined in the Water Vole Mitigation Handbook (Dean, M. et. Al., 2016) which are considered to be best practice. The above targeted surveys will enable appropriate mitigation measures to be implemented as set out in the OEPMS <b>[APP-326]</b>.</p>
EA-10	Hydrology, Flood Risk and Drainage  Ecology and Biodiversity	Water Quality	<p>"We require more information on the remedial actions suggested for filamentous algae in ditches to be able to comment on whether the predicted target of 'moderate' for WFD waterbody status can be obtained. We would like to see the actions that would be undertaken at year 4 should it fail to reach moderate status. If the applicant shares the data used to make the ditch assessment, we will be able to comment further.</p> <p>The applicant should consider off-site impacts that may alter the water quality of on-site ditches, for example, the use of fertilisers or maintenance requirements."</p>	<p>The possibilities for enhancement of ditches and watercourses within the Order Limits are being investigated and will be incorporated into a revised <b>7.3_A Outline Landscape and Ecological Management Plan Revision A [EN010132/EX1/WB7.3_A]</b> in due course. Enhancements already proposed relate to the sensitive management of newly created grassland habitats within field boundaries and buffer zones, as well as the cessation of pesticide and fertiliser application which can be expected to improve water quality and improve the connectivity, quantity and robustness of natural green infrastructure. Furthermore, the OLEMP <b>[EN010132/EX1/WB7.3_A]</b> currently states, in paragraph 4.9.9:</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p><i>"Ditch management will be carefully considered, with works being undertaken on a rotational basis so that undisturbed areas remain annually. Ditch management can be carried out every 2-5 years with cutting being undertaken in autumn/winter and only one side of the bank cut each time."</i></p> <p>It is proposed to amend the above passage to commit to incorporating rotational ditch management, as described, into the regular habitat management practices during the operational phase of the Scheme. The 2-5yr rotation will ensure a mosaic of habitat maturity across the ditches and watercourses within the Order Limits at all times, including a proportion of bare ground and tussocky grassland. Management practices would not take place between March and August inclusive. Ditch cleaning will be undertaken using excavators equipped with weed-clearing buckets to remove choking vegetation. An ecologist will work with the management contractor to prepare a plan and timetable of ditch management which will take into account the presence of newly-created valuable habitat and other seasonal and protected species constraints. The efficacy of the ditch management regime will be monitored periodically and this will be</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				incorporated into the LEMP's monitoring timetable as set out in para. 4.10.9 of <b>7.3_A Outline Landscape and Ecological Management Plan Revision A [EN010132/EX1/WB7.3_A]</b> . This is secured through Requirement 7 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> .
EA-11	Ecology and Biodiversity	Natural Flood Management	"We welcome the creation and enhancement of hedgerows, woodland, wetland and native wildflower meadows which would add multiple benefits in terms of improved water quality and natural flood management (NFM)."	The Applicant notes this comment.
EA-12	Landscape and Visual Ecology and Biodiversity Hydrology, Flood Risk and Drainage	Improvements to the River Till	We appreciate that a specialist Modular River Physical (MoRPh) survey of the River Till was not carried out, however, we believe it would be worthwhile exploring improvements on the Till and its tributaries as the site boundary for West Burton 2 runs perpendicular to the river. We would welcome consideration for smaller scale habitat improvements to tributaries of the River Till within the scheme boundary.	No physical enhancements are proposed beyond periodic ditch management to include the removal of choking vegetation.  Targeted and period ditch management is part of <b>7.3_A Outline Landscape and Ecological Management Plan Revision A [EN010132/EX1/WB7.3_A]</b> , (see para. 4.9.9).  The Applicant considers that any commitment to physical modifications to the River Till or its tributaries is beyond the remit of the Application.  It has been proposed to create a linear cluster of scrapes close to the River Till, with a feeder ditch connecting these scrapes and supplying

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>a source of water, in order to provide habitat for breeding and overwintering birds. The scrapes may be connected on a ditch line to ensure they remain wet into June. Where necessary, this may be connected into the River Till, which will be discussed with the Environment Agency and other experts as necessary. The scrapes and other wetland and pond creation are set out within the OLEMP [EN010132/EX1/WB7.3_A].</p> <p><b>6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> (the 'LVIA') takes into consideration the smaller drainage network, ditches and watercourses (see paras. 8.5.115, 8.5.118 and 8.5.150) at all stages of the Scheme including construction (para. 8.6.4). The LVIA notes (para. 8.9.37) that the intensive farming has diminished the 'sense of place' in parts including the drainage of flood plains and impact on the riparian vegetation and other habitats. Where watercourses survive, their associated vegetation helps curtail visibility across the area. The LVIA notes that public access is also limited to these features, but that the aesthetic would not be changed.</p> <p>The LVIA also looks to provide landscape mitigation to take account of the existing views from any public footpaths along the</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>banks of the River Till and within the local landscape to the watercourse. These viewpoints include VP09, VP10, VP11, VP19, VP20 and LCC-C-C. The assessment of these viewpoints is set out at <b>6.3.8.3 Environmental Statement - Appendix 8.3 Assessment of Potential Visual Effects [APP-074]</b>. For example, for VP11, the assessment notes that at operation (Year 15) "as the trees and hedgerows mature, views of the landscape would be more vegetated, and the denser tree cover would break up the flat arable fields". For VP20 at operation (Year 15), the assessment concludes that "Over time, as the mitigation planting establishes, views of the solar array would be screened. The large ecological mitigation planting would form an attractive swathe of land alongside the Till that provides year-round visual interest and excitement where visible."</p>
EA-13	Ecology and Biodiversity  Hydrology, Flood Risk and Drainage	Enhancement to habitat quality of ditches and watercourses	"Enhancements to habitat quality within ditches and watercourses not only benefits otters and water voles but can achieve an improvement to water quality in the rivers from a WFD perspective."	Enhancements incorporated into <b>7.3_A Outline Landscape and Ecological Management Plan Revision A [EN010132/EX1/WB7.3_A]</b> will provide multiple benefits for ecology and also water quality and natural flood management. A commitment is made within the OLEMP at para. 4.10.9 to conduct periodic rotational ditch management (including removal of

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				choking vegetation) observing sensitive seasonal timing in order to maintain a diversity of vegetation structure within ditch channels across the Order Limits. Please also refer to the response to EA-10 previous for further information.
EA-14	Hydrology, Flood Risk and Drainage	Cumulative impact on water quality	"It is important that the applicant considers the cumulative risk from the construction, operational and decommissioning phases to water quality. Has the applicant considered whether chemicals such as weed killers will be used during the operation, and if so, what will be done to prevent run-off into nearby ditches."	<p>Water quality is considered for all stages of the development within <b>6.3.10.1 Environmental Statement - Appendix 10.1: Flood Risk Assessment and Drainage Strategy Report [APP-089]</b> and will be managed / mitigated through the proposed surface water drainage scheme and Construction Environmental Management Plan (CEMP).</p> <p>The use of herbicides for weed killing will be avoided where possible in favour of hand pulling weeds. Where this is not possible, such as for widespread injurious weeds, these will be treated with spot herbicide treatment. This is detailed further in Section 4 of <b>7.3_A Outline Landscape and Ecological Management Plan Revision A [EN010132/EX1/WB7.3_A]</b>, measures within which are secured by Requirement 7 of Schedule 2 to <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
EA-15	Ecology and Biodiversity  Hydrology, Flood Risk and Drainage	Water Quality	"In Chapter 9 of the ES (9.7.68) it says that water quality in field boundary ditches is expected to significantly increase as a result of the change of use from agriculture use to placement of solar panels and the resultant removal of fertilisers/herbicides from the fields. However, as it cannot categorically be said that other fields in the vicinity wouldn't supply run-off we do not think it can be assumed that water quality would be better as a result of the change of use alone."	Considering the large scale of the proposed Scheme, which is up to 60 years in duration, and the area over which chemical inputs will be reduced, it is considered highly likely that at least local (i.e. within-Site and immediately downstream) improvements to water quality will result. The likelihood of this is increased when factoring in the proposed ditch management regime detailed in EA-10 above. The Applicant accepts that ongoing agricultural activities within land beyond the Order Limits are likely to continue to counteract this, but this is beyond the influence of the Scheme or the Applicant. The net level of inputs within the catchments affected is still likely to be reduced.
EA-16	Principle of Development (DCO)  Hydrology, Flood Risk and Drainage	Draft DCO	<p>"We have reviewed the documents listed below:</p> <ul style="list-style-type: none"> <li>• Environmental Statement Chapter 10: Hydrology, Flood Risk and Drainage (ref: [REDACTED])</li> <li>• Environmental Statement Appendix 10.1: Flood Risk Assessment and Drainage Strategy Report (ref: [REDACTED])</li> <li>• Crossing Schedule [REDACTED]</li> </ul> <p>We note that the applicant wishes to disapply the requirement for an environmental permit under Regulation 12 of the Environmental Permitting (England and Wales) Regulations 2016 (EPR) and</p>	<p>The Applicant notes this comment and has agreed with the EA in order to define the approach to, and scope of, the disapplication of Regulation 12 of the Environmental Permitting (England and Wales) Regulations 2016 (EPR). Resultantly, Article 6 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> has been updated to limit the disapplication to only permits in respect of flood risk activities.</p> <p>The Applicant hopes this matter can be suitably recorded through a Statement of</p>



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			includes this in the DCO (Part 2 Principal Powers) in Article 6(1)(h). As currently drafted this Article seeks to disapply Regulation 12 in its entirety, meaning that the requirement for all types of environmental permit is disapplied. We will not agree to this. We will only agree to disapply the requirement for a flood risk activity permit and only if we can reach an agreement regarding the Protective Provisions for the Environment Agency in Schedule 16 Part 9. We are unlikely to agree to the disapplication of other environmental permits under the 2016 Regulations, including a water discharge activity. Accordingly, we request that Article 6(1)(h) is amended to read: "regulation 12 (requirement for environmental permit) of the Environmental Permitting (England and Wales) Regulations 2016, in respect of a flood risk activity permit only".	Common Ground with the Environment Agency.
EA-17	Principle of Development (DCO)	Draft DCO	"We have reviewed the proposed protective provisions (Schedule 16, Part 9) for the protection of the Environment Agency. We do not accept the current wording and will work with the applicant to agree the wording."	The Applicant notes this comment and is working with the EA in order to agree the wording of protective provisions for the benefit of the EA.
EA-18	Hydrology, Flood Risk and Drainage	River Till Flood Storage Area	"It is understood that no development will be situated within the River Till Flood Storage Area (FSA). For the avoidance of doubt we would ask that the applicant overlay the River Till FSA outline onto the illustrative site layout plan and include it within Appendix 10.5 of the ES."	The Applicant confirms that the following illustrative site layout plans have been updated to show the River Till Flood Storage Area: <ul style="list-style-type: none"> <li>• <b>WB6.4.4.1_A ES Figure 4.1 - Illustrative Site Layout Plan West Burton</b></li> </ul>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p><b>1_Revision A</b> [EN010132/EX1/WB6.4.4.1_A];</p> <ul style="list-style-type: none"> <li>• <b>WB6.4.4.2_A ES Figure 4.2 - Illustrative Site Layout Plan West Burton 2_Revision A</b> [EN010132/EX1/WB6.4.4.2_A];</li> <li>• <b>WB6.3.10.3_A ES Appendix 10.3 FRA DS West Burton 1_Revision A</b> [EN010132/EX1/WB6.3.10.3_A]; and</li> <li>• <b>WB6.3.10.4_A ES Appendix 10.4 FRA DS West Burton 2_Revision A</b> [EN010132/EX1/WB6.3.10.4_A].</li> </ul>
EA-19	Principle of Development	River Crossings	"We welcome confirmation that where river crossings are proposed on the River Till and River Trent these will be carried out using trenchless techniques."	<p>The Applicant, as detailed within paragraph 4.5.51 of <b>6.2.4 Environmental Statement - Chapter 4 Scheme Description [APP-042]</b>, proposes to lay the cables across the River Till and Trent using trenchless techniques.</p> <p>Works with the potential to adversely affect the rivers have been considered in a precautionary manner, as detailed in paragraphs 7.1.1-7.2.3 of <b>7.17 Outline Ecological Protection and Mitigation Strategy [APP-326]</b>.</p> <p>The Outline Strategy is secured through Requirement 8 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>. It provides that</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p><i>"No part of the authorised development may commence until a written ecological protection and mitigation strategy has been submitted to and approved by the relevant planning authority for that part or, where the phase falls within the administrative areas of multiple relevant planning authorities, each of the relevant planning authorities."</i></p>
EA-20	Principle of Development	River Crossings	<p>"The applicant is advised to follow the [REDACTED] methodology for the proposed river crossing. Carrying the works out in accordance with the methodology within FRA3 will ensure works are done to the required standard in terms of flood risk."</p>	<p>The Applicant notes this comment and confirms that works will be carried out in accordance with the methodology within 'FRA3' as referred to by the EA.</p> <p>Document <b>7.6 Design and Access Statement [APP-314]</b> notes, in paragraph 3.1.24, that the cable will need to cross a number of features, including the River Till and the River Trent, via the use of horizontal directional drilling (HDD).</p> <p>Paragraph 8.2.3 of <b>7.17 Outline Ecological Protection and Mitigation Strategy [APP-326]</b> (as secured by Requirement 8 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>) notes that where "HDD is used under the Rivers Till and Trent and their tributaries, the ECoW [Ecological Clerk(s) of Works] will discuss the risk of causing excessive vibration and the release of</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>sediments with the operatives and engineers overseeing HDD works to ensure an adequate depth is used. In these locations, the ECoW will monitor the water column for sediment release during all stages of HDD work"</p> <p>The Applicant confirms that all works involving the crossing of a main river will be done in accordance with 'Service crossing below the bed of a main river not involving an open cut technique (FRA3)' methodology.</p>
EA-21	Hydrology, Flood Risk and Drainage	Climate change flood event	<p>"As noted within the ES (Appendix 10.5, paragraph 2.2.9) the scheme has been designed so that in the event of a 0.1% Annual Exceedance Probability (AEP) + 20% Climate Change flood event it would be possible to electrically isolate damaged infrastructure and replace it without affecting the operation of the rest of the scheme. Whilst we accept this approach, it would be up to the Secretary of State to determine whether this is acceptable in line with the development's classification as essential infrastructure and the National Policy Statement's requirement that new energy infrastructure "should also be designed and constructed to remain operational in times of flood" (EN-1 Overarching National Policy Statement for Energy, paragraph 5.8.5)."</p>	<p>The Applicant notes this comment.</p> <p>The flood risk mitigation for sensitive infrastructure is detailed at paragraphs 3.2.2-3.2.3 in <b>6.3.10.1 Environmental Statement - Appendix 10.1 Flood Risk Assessment and Drainage Strategy Report [APP-089]</b>. The Applicant has initiated engagement with EA through a Statement of Common Ground, and confirms specific minimum heights for sensitive infrastructure will be developed and provided to the EA during the detailed design process.</p> <p>Furthermore, the Applicant seeks to assure the EA that the mitigation measures set out in the Flood Risk Assessment and Drainage Strategy [APP-089 to APP-094] are secured through Requirement 11 of Schedule 2 to <b>3.1_A Draft Development Consent Order</b></p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<b>Revision A [EN010132/EX1/WB3.1_A].</b> Consideration of NPS EN-1 paragraph 5.7.3 and Draft NPS EN-1 paragraphs 5.8.6 to 5.8.8 have informed the site selection process for the Scheme and the Scheme's design, as set out in paragraph 6.3.38 of <b>7.5 Planning Statement [APP-313]</b> .
EA-22	Hydrology, Flood Risk and Drainage	Embedded mitigation	"We welcome the embedded mitigation to be adopted within the scheme design as outlined in the ES (10.7), especially the inclusion of an 8-metre easement around all watercourses and the sequential placement of critical infrastructure."	The Applicant notes this comment and notes that this embedded mitigation measure is set out in <b>7.13_A Concept Design Parameters Revision A [EN010132/EX1/WB7.13_A]</b> , which is secured by Requirement 5(2) of schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> .
EA-23	Hydrology, Flood Risk and Drainage	Floodplain cumulative impact	"Whilst the photovoltaic panels will be sequentially located in flood zone 1, our interpretation is that some will be located in flood zone 3 for West Burton 1, 2 and 3 (please see Appendix 1 for a visual representation of the area affected). Whilst likely to be negligible, there should be some consideration and calculation of the cumulative loss of floodplain volume from the posts supporting the photovoltaic panels and whether this loss needs to be reasonably compensated for as part of the proposals."	The Applicant confirms that <b>6.3.10.1 Environmental Statement - Appendix 10.1 Flood Risk Assessment and Drainage Strategy Report [APP-089]</b> will be updated following analysis of the loss of flood storage from supporting posts within flood Zone 3.
EA-24	Principle of Development (DCO)	Draft DCO	"The Book of Reference refers to Environment Agency rights and easements within the land that the cable route will pass through (land plan references: 07-106 and 07-107). These are highlighted as 'New rights	The Applicant notes this comment and objection, and confirms that it will work with the EA during the Examination to resolve this issue, in particular through negotiating a

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			(including restrictions) to be compulsorily acquired and temporary use of land and in relation which it is proposed to suspend or extinguish easements, servitudes and other private rights'. It is currently unclear how such proposed acquisitions would affect the Environment Agency's operations, in particular in relation to its flood risk management role. At this stage therefore the Environment Agency must object to any acquisition of land or rights in relation to its land interests until it has had a proper opportunity to assess the potential effects of the acquisitions sought by the applicant on its ability to carry out its operations. However, we will continue to work with the applicant to resolve this matter during the Examination period."	Statement of Common Ground and through seeking agreement on the protective provisions to be included in <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> for the benefit of the EA. The Applicant is not seeking to extinguish or interfere with any rights belonging to the EA that would affect the EA's ability to carry out its operations and is therefore confident that agreement can be reached.
EA-25	Principle of Development  Ground Conditions and Contamination	Pollution prevention	<p>"We would like to make the following comments in relation to ground condition and contamination having reviewed Chapter 11: Ground Conditions and Contamination of the ES (ref:</p> <p>In the ES Chapter 4, Scheme Description, paragraph 4.5.23, piles are mentioned as possible foundation solutions for some elements of the scheme. Reference is made to piles up to 12 metres deep for the energy storage facility. We would expect to see pollution prevention best practice detailed in the Construction Environment Management Plan (CEMP) to cover this scenario in order to avoid creating pathways for the rapid transmission of pollutants."</p>	<b>7.1_A Outline Construction Environmental Management Plan Revision A [EN010132/EX1/WB7.1_A]</b> provides outline detail regarding the mitigation measures to be implemented during the construction phase to reduce the risk to human health and the environment. Whilst no explicit reference is made to piling works and pollution prevention guidance at this stage, this can be secured as required through the final CEMP, which itself is secured by Requirement 13 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> .

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
EA-26	Hydrology, Flood Risk and Drainage	Pollution prevention	"The CEMP should detail the pollution prevention practices that will be employed to avoid contamination of the underlying aquifer by possible fire fighting water, which may contain pollutants. Bunding of the Battery Energy Storage System (BESS) is detailed in Chapter 4, section 4.5.33 of the ES."	<p>The Applicant seeks to assure the EA that measures to mitigate the risk of ground contamination from pollutant-carrying fire water are set out in Table 3.11 in <b>7.1_A Outline Construction Environmental Management Plan Revision A [EN010132/EX1/WB7.1_A]</b> which states "Bulk fuels and any chemicals used on the Sites will be stored appropriately, within an impervious bund of 110% of the volume of the container to reduce the potential for any contamination source in the event of a container failure / leak of battery fire and associated fire waters". The provisions in the Outline CEMP are secured Requirement 13 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>. Should the EA seek further agreement on the wording or further clarity, this can be agreed through the Statement of Common Ground between the Applicant and the EA.</p> <p>As stated in paragraphs 3.10.1 to 3.10.5 of <b>6.3.10.5 Environmental Statement - Appendix 10.5 FRA DS West Burton 3 [APP-093]</b>, fire water provision in line with Lincolnshire Fire and Rescue requirements has been accommodated within the Scheme.</p>
EA-27	Waste	Waste and CEMP	"Section 4.5.47 of the ES states that, "excavated soil will then be backfilled on top of the installed cables."	<b>7.1_A Outline Construction Environmental Management Plan Revision A</b>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
	Ground Conditions and Contamination		Soil and spoil management is also discussed in this chapter. The CEMP should include information about adhering to waste management legislation if the excavated material is contaminated. It is possible that the CL:AIRE Definition of Waste: Code of Practice will apply. Excavated materials that are recovered via a treatment operation can be reused on-site under the CL:AIRE. This voluntary Code of Practice provides a framework for determining whether or not excavated material arising from site during remediation and/or land development works are waste."	<b>[EN010132/EX1/WB7.1_A]</b> provides outline detail regarding the identification, storage, management, and remediation of contamination from onsite excavation. The Applicant will comply with all other applicable legislation when constructing the authorised development, including waste management legislation. Whilst no explicit reference is made to waste management legislation at this stage, this can be secured as required through the final CEMP, which itself is secured by Requirement 13 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> .
EA-28	Waste Ground Conditions and Contamination	Waste and CEMP	"Chapter 11, section 11.7.3 of the ES states that a discovery strategy for the identification and management of unsuspected contamination will be included in the CEMP, which we welcome. We agree with the conclusion of Chapter 11 of the ES that cumulative effects to human health and controlled waters are deemed to be negligible with the implementation of mitigation measures as detailed in the CEMP."	The Applicant notes this comment and confirms that a discovery strategy for the identification and management of unsuspected contamination is included in Table 3.11 of <b>7.1_A Outline Construction Environmental Management Plan Revision A [EN010132/EX1/WB7.1_A]</b> , which is secured by means of Requirement 13 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> .
EA-29	Principle of Development (DCO)	Draft DCO	"Under The Environmental Permitting (England and Wales) Regulations 2016 a permit is required for installations, medium combustion plant, specified generator, waste or mining waste operations, water	The Applicant notes this comment and confirms that any required permits will be applied for at the appropriate time.



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
	Hydrology, Flood Risk and Drainage		discharge or groundwater activities, or work on or near a main river or sea defence."	
EA-30	Principle of Development (DCO)  Hydrology, Flood Risk and Drainage	Draft DCO	"As referred to in paragraph 4.2 above, the disapplication of The Environmental Permitting (England and Wales) Regulations 2016 for work on or near a main river or sea defence (flood risk activity) is the only activity we will agree to disapply (subject to agreement regarding Protective Provisions). The applicant should make it clear that any reference made to The Environmental Permitting (England and Wales) Regulations 2016 within the DCO text is related to flood risk activities only and that any additional permits for water abstraction or discharge would still need to be applied for."	The Applicant notes this comment and has agreed with the EA in order to define the approach to, and scope of, the disapplication of Regulation 12 of the Environmental Permitting (England and Wales) Regulations 2016 (EPR). Resultantly, Article 6 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> has been updated to limit the disapplication to only permits in respect of flood risk activities.  The Applicant hopes this matter can be suitably recorded through a Statement of Common Ground with the Environment Agency.
EA-31	Principle of Development (DCO)  Hydrology, Flood Risk and Drainage	Draft DCO	"We do not agree to the disapplication of sections 24 (restrictions on abstraction) and 25 (restrictions on impounding) of the Water Resources Act 1991.  As referred to in paragraphs 4.2 we will not agree to the disapplication of the requirement for any environmental permit, other than a flood risk activity permit in exchange for agreed protective provisions.  We are considering the disapplication of local legislation listed in Schedule 3 of the DCO. If we have	The Applicant notes this comment and intends to work with the EA in order to agree a position regarding the disapplication of the sections 24 and 25 of the Water Resources Act 1991; the Environmental Permitting Regulations and the wording of the protective provisions for the protection of the EA, to be included in the draft DCO.  The Applicant furthermore notes the EA's comments about reviewing Schedule 3 of

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			any concerns about this, we will endeavour to include comments in our written representations."	<b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A].</b>
EA-32	Principle of Development (DCO)	Draft DCO Revision	"The Environment Agency wishes to be a specific named consultee in respect of Schedule 2, Requirement 7 (landscape and ecological management plan); and Requirement 21 (decommissioning and restoration). We welcome our inclusion as a consultee to Requirement 6 (battery safety management plan); Requirement 13 (construction environment management plan); and Requirement 14 (operational environmental management plan). We would request that for the avoidance of doubt the words "following consultation with the Environment Agency" are inserted after "relevant planning authority". This will give us an opportunity to comment on the detailed mitigation and management schemes, secured post consent, to ensure adequate protection and enhancement of the environment."	The Applicant confirms that the EA will be a specific named consultee in respect of the Requirements as requested by EA.
EA-33	Principle of Development (DCO)	Draft DCO Revision	"Schedule 17: Procedure for Discharge of Requirements – We have concerns that the procedure outlined in this section of the DCO will not provide sufficient time for adequate consultation to take place for the discharge of Requirements. Paragraph 3(3) states that where "consultation with a requirement consultee is required, the relevant planning authority must issue the consultation to the requirement consultee within five working days of receipt of the application, and must notify the undertaker in writing	The Applicant confirms that paragraph 3(3) in Schedule 17 to <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> has been amended to align with the EA's request. However, the reference to 10 days in paragraph 4(2)(c) will remain the same, as the Applicant considers that this is a suitable time period to enable any appeals to be managed efficiently. The

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>specifying any further information the relevant planning authority considers necessary or that is requested by the requirement consultee within five working days of receipt of such a request and in any event within 15 working days of receipt of the application". If the relevant planning authority does not issue the consultation until day 5, this would only provide the consultee with 10 working days to respond. The Environment Agency requests that this is amended to 20 working days to provide sufficient consultation timescales that align with those in the Development Management Procedure Order 2015, i.e. 21 days (equivalent to 15 working days) in addition to the 5 working days allocated for the relevant planning authority to issue the consultation.</p> <p>Similarly with Paragraph 4 appeals, (2)(c) should be amended to allow representations to be submitted within 20 working days. 7.7.</p> <p>We would also request that for the avoidance of doubt 'working day' is included in Paragraph 1 'Interpretation' as 'any day other than a Saturday, Sunday or English bank or public holiday'</p>	<p>definition of "working day" will also be updated.</p>
EA-34	Principle of Development	Principle of Development	<p>"In summary, we can confirm that we have no objection to the principle of the proposed development, as submitted. The holding objection and issues outlined above are all capable of resolution and we look forward to receiving additional information to resolve our outstanding concerns. We</p>	<p>The Applicant notes this comment and looks forward to working with the Environment Agency throughout the Examination on the matters referred to above, through the parties' Statement of Common Ground and other engagement.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>will also continue to work with the applicant to agree the wording of the protective provisions.</p> <p>We reserve the right to add or amend these representations, including requests for DCO Requirements and protective provisions should further information be forthcoming during the course of the examination on issues within our remit."</p>	

**Table 2.2.4: Applicant's Response to Network Rail Infrastructure Limited [RR-236]**

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
NRIL-01	Principle of Development (DCO / CA)	Draft DCO Compulsory Acquisition Powers	<p>"This is the section 56 representation of Network Rail Infrastructure Limited (Network Rail) provided in respect of West Burton Solar Project Limited's (Applicant) application for a Development Consent Order (Order) which seeks powers to enable the construction, operation, maintenance and decommissioning of the West Burton Solar Project, being a ground mounted solar photovoltaic panel array, energy generating facility, a Battery Energy Storage System, and supporting infrastructure (Scheme).</p> <p>The Book of Reference (BoR) identifies plots 06-068, 06-069, 06-070, 06-071, 06-072, 06-073, 06-074 and 06-083 (Plots) as land owned by Network Rail in respect of which compulsory acquisition powers to acquire new rights are sought. The</p>	<p>The Applicant notes this comment and objection, and confirms that Network Rail's understanding of the compulsory powers sought in the application is correct.</p> <p>The Applicant notes that business and technical clearances have been issued for the Scheme by Network Rail.</p> <p>The Applicant has been negotiating protective provisions with Network Rail ensure that its statutory undertaking is not subject to serious detriment as a result of the Scheme. Draft protective provisions are included in Part 10 to Schedule 16 of the <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>, and these contain protections relating to "railway property". The</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>compulsory acquisition powers sought are described in the BoR and on the Land Plans as being:</p> <ul style="list-style-type: none"> <li>new rights (including restrictions) to be compulsorily acquired and temporary use of land and in relation to which it is proposed to suspend or extinguish easements, servitudes and other private rights; and</li> <li>temporary use of land and in relation to which it is proposed to temporarily suspend easements, servitudes and other private rights (together Compulsory Powers).</li> </ul> <p>Network Rail notes that the compulsory powers are sought in relation to operational railway land forming part of the operational railway being the Sheffield to Lincoln line. Network Rail objects to the inclusion of the Plots in the Order and to the acquisition of Compulsory Powers in respect of them."</p>	<p>Applicant is in the process of negotiating the necessary property rights required for the Scheme on Network Rail's land. The Applicant is confident that agreement can be reached with Network Rail prior to the close of the Examination.</p>
NRIL-02	Principle of Development (DCO / CA)	Draft DCO Compulsory Acquisition Powers	<p>"The Plots constitute land acquired by Network Rail for the purpose of its statutory undertaking and, accordingly, this representation is made under section 56 and sections 127 and 138 of the Planning Act 2008. Network Rail considers that there is no compelling case in the public interest for the acquisition of Compulsory Powers and</p>	<p>The Applicant notes this comment, and respectfully disagrees with Network Rail's statement that there is no compelling case in the public interest for seeking compulsory acquisition powers. Section 10.3 of <b>4.1 Statement of Reasons</b> (Compulsory Acquisition Information) <b>[APP-019]</b>, sets out the case for why the powers</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>Network Rail considers that the Secretary of State, in applying section 127 of the Planning Act 2008, cannot conclude that new rights and restrictions over the railway land can be created without serious detriment to Network Rail's undertaking; no other land is available to Network Rail which means that the detriment can be made good by them."</p>	<p>sought over land are necessary and proportionate to deliver the Scheme.</p> <p>Draft protective provisions are included in Part 10 to Schedule 16 of the <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>, and these require the Applicant to obtain Network Rail's consent prior to carrying out any works thereby ensuring there is no serious detriment to Network Rail's undertaking.</p>
NRIL-03	Principle of Development (DCO / CA)	Draft DCO Compulsory Acquisition Powers	<p>"Network Rail also objects to all other compulsory powers in the Order to the extent that they affect, and may be exercised in relation to, Network Rail's property and interests. In order for Network Rail to be in a position to withdraw its objection Network Rail requires:</p> <ul style="list-style-type: none"> <li>(a) agreements with the Applicant that regulate: <ul style="list-style-type: none"> <li>(i) the manner in which rights over the Plots and any other railway property are acquired and the relevant works are carried out including terms which protect Network Rail's statutory undertaking and agreement that compulsory acquisition powers will not be exercised in relation to such land; and</li> </ul> </li> </ul>	<p>As set out in the response to NRIL-01, discussions relating to voluntary property agreements are ongoing and the Applicant is confident that agreement can be reached prior to the close of the Examination.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>(ii) the carrying out of works in the vicinity of the operational railway network to safeguard Network Rail's statutory undertaking;</p> <p>(b) Network Rail welcomes the fact that there are protective provisions for its benefit in the Order and, if necessary, will provide detailed comments on, and amendments to, the protective provisions when it submits its detailed Written Representation."</p>	
NRIL-04	Principle of Development (DCO / CA)	Draft DCO Protective Provisions	"To safeguard Network Rail's interests and the safety and integrity of the operational railway, Network Rail objects to the inclusion of the Compulsory Powers and any other powers affecting Network Rail in the Order. Network Rail requests that the Examining Authority treat Network Rail as an Interested Party for the purposes of Examination."	The Applicant notes this comment and refers Network Rail to the responses to NRIL-01, 02 and 03 above which respond to these concerns.

**Table 2.2.5: Applicant's Response to Natural England [RR-233]**

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
NE-01	Ecology and Biodiversity	Soils and Best and Most Versatile Land (BMV)	"Overall, Natural England are satisfied that the proposals address the majority of potential impacts to the natural environment. The only areas of concern we consider require further	A table will be provided showing areas of Agricultural Land Classification (ALC) grade against elements of the Scheme. Suggested elements would be the Solar Arrays area,

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
	Soils and Agriculture		<p>assessment and or information to enable the examining authority to make an informed decision are: Soils and Best and Most Versatile (BMV) Agricultural Land and Protected Species.</p> <p>The key concerns we have regarding Soils and BMV agricultural land are:</p> <ul style="list-style-type: none"> <li>• The omission of assessment of the loss of BMV land to each element of the proposal, including biodiversity opportunity areas;</li> <li>• The requirement for additional commitments for the content of the detailed Soil Management Plan;</li> <li>• The restoration of the site following decommissioning</li> </ul> <p>The key concerns we have regarding Protected Species are:</p> <ul style="list-style-type: none"> <li>• The possible need for protected species licences"</li> </ul>	<p>access tracks, Substation and BESS (including compounds). It should be reiterated that no agricultural land is permanently lost to the proposed development. All elements can be restored without loss of agricultural land resource extent or ALC grade. Furthermore, the Solar Arrays area can continue in agricultural production during operation of the Scheme</p> <p>The detailed Soil Management Plan (which must be substantially in accordance with <b>6.3.19.2 Environmental Statement Appendix 19.2 Outline Soil Management Plan [APP-138]</b>) will be approved by the relevant planning authority post consent as secured through Requirement 19 of Schedule 2 to <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>. It will ensure the aims of conserving the soil resource and maintaining the current ALC baseline are achieved.</p> <p>We note the Defra "Construction Code of Practice for the Sustainable Use of Soils on Construction Sites" and "BSSS Benefitting from Soil Management in Development and Construction" documents both give advice pertinent to achieving these aims. We would also add that the Institute of Quarrying document "Good Practice Guide for Handling</p>



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>Soils in Mineral Workings" provides more detailed advice on plant selection and soil conditions appropriate to the soil stripping, storage and reinstatement that will take over a limited extent within the Sites (temporary tracks, cable laying and switchgear housing locations.</p> <p>Restoration of agricultural land taking place as part of the decommissioning works will follow the Soil Management Plan (SMP) measures within <b>7.2 Outline Decommissioning Statement [APP-310]</b> as secured by Requirement 21 of Schedule 2 to <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>. This will ensure that where stripped and stored soils are reinstated, there is no loss of extent or quality (as measured by ALC Grade) of agricultural land.</p> <p>Precautionary methods and contingency measures are set out in <b>7.17 Outline Ecological Protection and Mitigation Strategy [APP-326]</b> to ensure that, in the unlikely event of protected species being found in advance of or during construction works (e.g. by ECoWs), any necessary licences can be applied for and/or work programmes altered to proceed in a lawful manner.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
NE-02	General	Statement of Common Ground (SoCG)	"We have not been engaged regarding the development of a Statement of Common Ground (SoCG) or any other supporting documentation, such as a Letter of No Impediment (LoNI). If the applicant wishes to develop any such documentation, further engagement should be sought in due course. In the absence of a SoCG, Natural England advises that the matters set out in these representations will require consideration by the Examining Authority as part of the examination process."	The Applicant notes this comment and since Natural England submitted this representation has initiated engagement with Natural England through a Statement of Common Ground. Further engagement with Natural England will be initiated if and when it is required.
NE-03	Ecology and Biodiversity	Internationally Designated Sites	"Impacts to internationally designated sites are discussed within ES Chapter 9 (Ecology and Biodiversity) and the 'Information to Support a Habitats Regulations Assessment' contains a more detailed assessment of potential impacts to these sites. Natural England have worked with the applicant through our Discretionary Advice Service, including providing advice regarding potential impacts to Internationally Designated Sites. The 'Information to Support a Habitats Regulation Assessment' concludes that no significant effects are likely to occur. Natural England concur with this conclusion."	The Applicant notes this comment.
NE-04	Ecology and Biodiversity	Protected Species	"Natural England have provided advice via our Discretionary Advice Service regarding Great Crested Newts, Bats, Water Voles and Otters.	The Applicant notes this comment. As a result of baseline surveys and sensitive development design, the potential for impacts

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			<p>This advice has been provided within the application at Appendix 9.1.</p> <p>As it stands, ES Chapter 9 indicates that no protected species licences are required from Natural England, although it is noted that a number of licences may be required where avoidance is not possible during construction.</p> <ul style="list-style-type: none"> <li>• Section 6.3.2 of the oEPMS states that where a bat roost is discovered, a licence may be required from Natural England.</li> <li>• Section 6.6.4 of the oEPMS states that where impacts to holts, burrows or sheltering sites for Otter/Water Vole are unavoidable, a licence from Natural England may be required.</li> <li>• Section 9.4.2 of the oEPMS states that where an active badger sett is to be unavoidably impacted by construction activities, a licence from Natural England may be required.</li> </ul> <p>Natural England welcome the approach taken to avoid any impacts to protected species before resorting to the need for a licence to undertake potentially damaging works. This approach should be maintained within the detailed EPMS, which is a requirement within</p>	<p>on the listed protected species is low and that no clear need for protected species licensing is identified. As such, it is not possible at this stage to prepare any draft licences to inform a Letter of No Impediment given an absence of need.</p> <p>Precautionary methods and contingency measures are set out in <b>7.17 Outline Ecological Protection and Mitigation Strategy [APP-326]</b> to ensure that, in the unlikely event of protected species being found in advance of or during construction works (e.g. by ECoWs), any necessary licences can be applied for and/or work programmes altered to proceed in a lawful manner. These measures are secured through Requirement 8 of Schedule 2 to <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>the draft DCO. Nonetheless, as there may be a requirement for protected species licences from Natural England, we would like to flag this within our representations, but acknowledge that there may be a circumstance where no licences are required; as such this would not pose a significant obstacle. At this stage, Natural England have not been engaged regarding the production of a Letter of No Impediment (LoNI) for protected Species Licences; should this be required, submission of draft protected species licence applications would be required for review. Information relating to wildlife licencing and NSIPs is provided within the Planning Inspectorate's Advice Note 11, Annex C – Natural England and the Planning Inspectorate. Specifically, at the bottom of page 6 and within Appendix I."</p>	
NE-05	Ecology and Biodiversity	Biodiversity Net Gain (BNG) and Biodiversity Enhancements	<p>"Biodiversity Net Gain is a demonstrable gain in biodiversity assets as a result of a development project that may or may not cause biodiversity loss, but where the final output is an overall net gain. The Environment Act has set out that Biodiversity Net Gain will be mandatory for the majority of new development from November 2023 and mandatory for NSIPs in 2025. Whilst Biodiversity Net Gain is not yet mandatory, it is considered best practise to deliver a</p>	The Applicant notes this comment.

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>measurable net gain through any new development.</p> <p>Natural England acknowledge the production of Appendix 9.12 (Biodiversity Net Gain Report), which illustrates via use of the Biodiversity Metric 3.1 that the proposal will give rise to gains for biodiversity in the magnitude of 86.80% for habitat units, 54.71% for hedgerow units and 33.25% for river units. This is in exceedance of the intended 10% mandatory gain and is welcomed. It is noted that the trading rules have not been satisfied within the calculations, however, rationale for this is set out within sections 6.1.7 – 6.1.12. Natural England acknowledge this rationale, and concur that the proposed enhancements to the arable field margins are likely to enhance overall biodiversity."</p>	
NE-06	Ecology and Biodiversity	Biodiversity Net Gain (BNG) and Biodiversity Enhancements	<p>"Overall, Natural England welcome the biodiversity enhancement proposals, illustrated in the Landscape and Ecology Mitigation and Enhancement Plans (ES figures 8.18.1 to 8.18.3).</p> <p>The provisions of the oLEMP are also noted, which outline appropriate management measures to ensure the maximum benefit for biodiversity is realised during the operational phase of the scheme. We note section 4.11 of the oLEMP which sets out the outline</p>	The Applicant notes this comment.

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			<p>monitoring methods for the site. Monitoring of the habitats created and enhanced through the scheme is essential to ensure their successful establishment and ongoing success. We would, however, encourage further detail to be provided within the detailed LEMP to cover specific management actions to be taken where a specific habitat fails to establish."</p>	
NE-07	Landscape and Visual	Nationally Designated Landscapes	<p>"The proposed development is not located within, or within the setting of, any nationally designated landscapes. As a result, Natural England has no specific comments to make on the landscape implications of this development. The examining authority should have regard for the landscape character of the area; we welcome the reference to Natural England's National Character Areas and other Local Landscape Character Assessments within ES Chapter 8 (Landscape and Visual Impact Assessment). We would also like to stress the importance of cumulative landscape impacts from the development."</p>	<p>The Applicant recognises that the Scheme is not located within, or within the setting of, any nationally designated landscapes.</p> <p><b>6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> (the 'LVIA') assesses the effects of the Scheme on landscape and visual receptors, including on the AGLV designation, in particular the Ridge AGLV or Loughton Wood AGLV (as identified in paragraphs 8.4.11, 8.5.125, 8.5.126, 8.5.142, 8.5.161, 8.5.162, 8.7.36, 8.7.38, 8.7.86, 8.7.88, 8.7.145, 8.7.147, 8.9.47, 8.9.48, 8.9.49) noting there will be positive changes to the wider setting of the AGLVs due to the additional vegetation enhancing the local landscape character.</p> <p>The LVIA also considers the impacts of the Scheme on the AGLV designation alongside other cumulatively assessed NSIPs (see paragraphs 8.10.74 to 8.10.79) and has</p>

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				concluded that there will be no significant adverse effects on landscape character and visual amenity over an extensive area as a result of the cumulative impacts of the schemes.
NE-08	Soils and Agriculture	Best and Most Versatile (BMV) Agricultural Land	"Based on the information provided within the Environmental Statement (ES) (Chapter 19: Soils and Agriculture and Appendix 19.1 Agricultural Land Quality, Soil Resources & Farming Circumstances), it appears that the proposed development will result in the temporary development of 886.4ha (19.3.5), of which 199.5ha is BMV agricultural land (Grades 1, 2 and 3a land in the Agricultural Land Classification (ALC) system), as determined from detailed ALC surveys. It is acknowledged that some of the order limits will remain in arable use (i.e. N24, N26, N28, N29, N30 & N31 as illustrated in figure 8.18.1)."	The Applicant notes this comment.  The fields remaining in arable use form part of the Bird Mitigation Area which is described within the <b>7.3_A Outline Landscape and Ecological Management Plan Revision A [EN010132/EX1/WB7.3_A]</b> and will be managed on a 3 year rotation in order to provide optimal nesting habitat and foraging resources for skylarks of greater value than at present. Spring sown cereal crops will be established in a third of the area and will be rotated with two thirds of the area that will remain fallow.
NE-09	Soils and Agriculture	Best and Most Versatile (BMV) Agricultural Land	"During the life of the proposed development, it is likely that there will be a reduction in agricultural production over the whole development area. Furthermore, if not time limited as described, the proposed development has the potential to lead to the permanent reduction in agricultural production. This should be considered whether this is an effective use of land in line with the National Policy Statement for Energy (EN-1) and	The Applicant notes this comment and acknowledges that there will be a reduction in agricultural production during the Scheme's lifetime. However, the land will be fully restored to agricultural use upon completion of the decommissioning of the Scheme. During the Scheme's operational life, there is potential for some agricultural practices (such as sheep grazing) to continue, and this will be considered where feasible and appropriate, as

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			Renewable Energy Infrastructure (EN-3), which encourages the Applicant to seek to 'minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5) except where this would be inconsistent with other sustainability considerations'."	<p>set out in the <b>7.3_A Outline Landscape and Ecological Management Plan Revision A [EN010132/EX1/WB7.3_A]</b>.</p> <p>That notwithstanding, farmers are under no obligation to keep land in food production or maintain a minimum intensity of agricultural production. Farmers are offered a range of payments for targeted reduction in intensity of land use, such as reverting arable land to low input pasture or the establishment of woodland. Furthermore, the UK Food Security report published by Defra shows that the major risks to UK food security include climate change and soil degradation, but not land use change.</p> <p>The agricultural land resource is not lost to or degraded by a solar farm development. The impact on the agricultural land resource has therefore been assessed to be minimal in <b>6.2.19 Environmental Statement - Chapter 19 Soils and Agriculture [APP-057]</b>.</p>
NE-10	Soils and Agriculture	Best and Most Versatile (BMV) Agricultural Land	"We would also draw to your attention to Planning Practice Guidance for Renewable and Low Carbon Energy (March 2015) (in particular paragraph 013) and advise you to fully consider BMV land issues in accordance with that guidance."	PPG for Renewable and Low Carbon Energy (March 2015) paragraph 013 is explicitly referred to in paragraph 19.2.14 of <b>6.2.19 Environmental Statement - Chapter 19 Soils and Agriculture [APP-057]</b> and as such has been fully considered. Furthermore, NE guidance given in TIN049 is referenced in



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				paragraph 19.2.21 <b>[APP-057]</b> , which has been considered in preparing the assessment. <b>6.3.19.1 Environmental Statement - Appendix 19.1 Agricultural Land Quality, Soil Resources and Farming Circumstances Report [APP-137]</b> provides results of the detailed ALC assessment of the Sites.
NE-11	Soils and Agriculture	Soil resources	It is considered that as the solar panels would be secured to the ground by steel piles with limited soil disturbance, they could be removed in the future with no permanent loss of agricultural land quality likely to occur, provided the appropriate soil management is employed and the development is undertaken to high standards. Consequently, Natural England would advise that any grant of planning permission should be made subject to requirements to safeguard soil resources and agricultural land.	The Applicant notes this comment and refers to the response to NE-01 previous.
NE-12	Soils and Agriculture	Permanent/Temporary loss	"It is assumed within the ES that the development will not lead to any permanent loss of agricultural land. The area proposed to be occupied by the Substation, Battery Storage (BESS) and access tracks will be lost for the lifetime of the development, however, 9.9.22 states that all hardstanding will be removed and restored to agricultural land. Natural England would like to note that this assessment	The Applicant confirms that the measures set out in <b>7.2 Outline Decommissioning Statement [APP-310]</b> together with <b>6.3.19.2 Environmental Statement Appendix 19.2 Outline Soil Management Plan [APP-138]</b> (as secured by Requirements 21 and 19 of Schedule 2 to <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> respectively) require

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			<p>of no permanent loss of agricultural land differs from the assessment provided in support of the Cottam Solar project, proposed by the same applicant and consultant. At the Cottam Solar Project, 29ha are proposed to be occupied by the substations and BESS (Cottam Solar Project ES 19.9.3); this area is considered to be permanently lost, despite the intention to restore it to agriculture. As a result, Natural England advise that for the West Burton Project, a commitment should be made to return the substation, BESS and access tracks to their original ALC grade following decommissioning, otherwise the land should be considered permanently lost, as they are within the Cottam Solar Project assessment."</p>	<p>agricultural land to be restored to the standard of the existing baseline ALC Grade.</p> <p>The Cottam application assessed the impact of loss of agricultural land to elements such as the BESS and substation. This has been subsequently clarified to this being a worst case scenario, and that restoration of all elements to agricultural land of the existing baseline ALC Grade, can be achieved. Furthermore, the Applicant clarifies that there is no permanent loss of agricultural land as a result of the Scheme.</p>
NE-13	Soils and Agriculture	Permanent/Temporary loss	<p>"Natural England welcome the summary provided within the oSMP 8.7.2 regarding the return of hardstanding areas to agriculture, but advise that a commitment should be made to including the full details of this process within the detailed SMP. This should include: soil handling methodology, soil moisture criteria, (top)soil storage (soil volume, location, etc), remediation methodology (i.e. decompaction), restoration (including restoration criteria) and aftercare.</p> <p>The area proposed to be occupied by the Substations, Battery Storage (BESS) is noted to</p>	<p>6ha is the approximate area of the combined extent of BESS and substation. The 4.27ha area given in para. 19.3.5 of <b>6.2.19 Environmental Statement - Chapter 19 Soils and Agriculture [APP-057]</b> is the area of substation alone so will be corrected for clarity. The difference of under 2ha does not affect the impact assessment.</p> <p>Paragraph 19.9.12 <b>[APP-057]</b> confirms that there will be no loss of agricultural land resource during the operational phase of the Scheme. For the land areas that will house the substation and BESS, agricultural land use will</p>

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			be 4.27ha at 19.3.5. However, at 19.9.2 the same is noted to be approximately 6ha (19.9.2). Clarity is required as to the amount of land this infrastructure will occupy. Additionally, ES section 19.9.12 states there will be no loss of agricultural land resource during operation, however, with the Substations, BESS and access tracks, we would query that this resource is lost during operation."	not be possible during the operation phase, but given the commitments to fully restore the land as part of decommissioning, there is not anticipated to be any permanent loss of the agricultural land resource. It is further noted that the areas concerned are a small fraction of the Order Limits, and, as noted in response NE-09 above, during the Scheme's operational life, there is potential for some agricultural practices (such as sheep grazing) to continue, and this will be considered where feasible and appropriate, as set out in the <b>7.3_A Outline Landscape and Ecological Management Plan Revision A [EN010132/EX1/WB7.3_A]</b> .
NE-14	Soils and Agriculture	ALC breakdown	"No breakdown of agricultural land quality has been provided for each element of the development. The discussion within chapter 19 is limited to the ALC grade of the whole site, and the area to be impacted by the substations and BESS. The ES should include additional information to clearly show the amounts and proportions of agricultural land, including the amount of BMV land, impacted by each element of the Proposed Development, including all infrastructure, solar PV arrays; retained arable fields and other mitigation and enhancement options (i.e. Biodiversity Opportunity Areas) to properly inform an assessment of impacts."	A breakdown of ALC Grade area by elements of the Scheme will be provided.

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NE-15	Alternatives and Design Evolution  Soils and Agriculture	Best and Most Versatile (BMV) Agricultural Land	"It is acknowledged that the detailed ALC survey has been used to influence the Proposed Development lay out, with the panels placed away from the highest quality agricultural land. Whilst there continue to be areas of BMV land within the order limits, large areas of high quality land have been excluded from the order limits altogether."	The Applicant notes this comment.
NE-16	Soils and Agriculture	Soil Resource Benefits	"ES section 19.9.13 sets out the possible soil resource benefits from the scheme. We acknowledge the supporting evidence for these benefits, especially to Soil Organic Matter, however, there remain uncertainties with regard to the impact solar panels may have on other soil properties such as carbon storage, structure and biodiversity. For example, as a result of changes in shading; temperature changes; preferential flow pathways; micro-climate; and vegetation growth caused by the panels. Therefore, it is unknown what the overall impact of a temporary solar development will have on soil health."	As referenced in paragraph 19.9.14 of <b>6.2.19 Environmental Statement - Chapter 19 Soils and Agriculture [APP-057]</b> , Defra R&D project SP08016 gives confidence that for all soil types, the reversion of arable land to a grassland delivers a recovery in soil organic matter with attendant environmental benefits such as a reduction in diffuse pollution from agriculture and improvement in biodiversity. There is no known aspect of a solar farm that would significantly inhibit or reverse these benefits from the reversion of arable land to grassland. No detrimental effects of UK solar farms on soil health have been observed.
NE-17	Soils and Agriculture	ALC Cable Route	"ES Section 19.3.7 states that no soil survey has been undertaken along the cable route corridor. Section 4.1.1 of the oSMP states that a detailed survey of the cable route corridor will be made a condition of the DCO. Natural England recognise that a deviation from the standard soil survey methodology will be	The Applicant notes this comment.  Provision of the measures set out in <b>6.3.19.2 Environmental Statement - Appendix 19.2 Outline Soil Management Plan [APP-138]</b> are secured through Requirement 19 in Schedule 2

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			required due to the linear nature of the cable trench. Natural England advise that this further survey work should be made a requirement of the DCO, to ensure the appropriate soil management can be implemented along the cable corridor. Restoration of the cable trenches to their current ALC grade should also be secured to ensure the impacts along the cable route are only temporary as described."	of <b>WB3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> .
NE-18	Soils and Agriculture	In-combination impacts of shared cable corridor	"ES section 4.5.53 to 4.3.56 discusses the construction of the 'Shared Cable Route Corridor' which is proposed to be shared with Gate Burton Energy Park and Cottam Solar Project. Two scenarios are presented, one whereby the cables are laid at the same time (scenario 1), and another where the cables are laid separately (scenario 2). The possible impacts of this element of the proposal on soils have not been assessed within chapter 9. Natural England advise that an assessment of potential cumulative impacts of works at the shared cable route should be included within chapter 9. We note the potential for significant soil damage where three sequential cable laying events occur in the same area (scenario 2)."	The Applicant infers that this comment is in relation to <b>6.2.19 Environmental Statement - Chapter 19 Soils and Agriculture [APP-057]</b> .  Paragraph 19.3.6 <b>[APP-057]</b> notes that sections of cable may be laid within ducting where there is potential for a shared grid connection with other facilities. Such ducts will enable additional services to be drawn through the duct without re- excavation. Where no duct is used, additional services will be laid in a parallel corridor. Re-excavating an existing cable trench to lay additional services would present an unnecessary risk both to workers and the existing buried service.
NE-19	Soils and Agriculture	Outline Soil Management Plan (OSMP)	Natural England welcomes the preparation of an Outline Soil Management Plan (oSMP) which has been prepared and submitted with the application. We note the outline nature of the	The detailed Soil Management Plan (which must be substantially in accordance with <b>6.3.19.2 Environmental Statement - Appendix 19.2 Outline Soil Management</b>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>plan; understand that the detailed SMP will include the full suite of information outlined in the oSMP. We have set out our advice on the oSMP below:</p> <ul style="list-style-type: none"> <li>The proposed requirements in oSMP section 8 should make reference to the Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites. The British Society of Soil Science has published the <i>Benefitting from Soil Management in Development and Construction</i> which sets out measures for the protection of soils within the planning system and the development of individual sites, which we also recommend is followed.</li> <li>oSMP section 4.1.1 sets out the requirement for soil sampling along the cable route. As discussed previously, soil sampling along the cable route should be made a requirement of the DCO, to ensure operations and restoration are correctly informed and the cable route is restored to its current ALC grade.</li> <li>oSMP section 7.1.2 states 'A map of topsoil units will be prepared as a requirement of the SMP and retained to</li> </ul>	<p><b>Plan [APP-138]</b> will be approved by the relevant planning authority post consent. It will ensure the aims of conserving the soil resource and maintaining the current ALC baseline are achieved. This is secured by Requirement 19 of Schedule 2 in <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p> <p>We note the Defra "Construction Code of Practice for the Sustainable Use of Soils on Construction Sites" and "BSSS Benefitting from Soil Management in Development and Construction" documents both give advice pertinent to achieving these aims. We would also add that the Institute of Quarrying document "Good Practice Guide for Handling Soils in Mineral Workings" provides more detailed advice on plant selection and soil conditions appropriate to the soil stripping, storage and reinstatement that will take over a limited extent within the Sites (temporary tracks, cable laying and switchgear housing locations).</p> <p>We agree that appropriate soil sampling along the cable route corridor to inform the SMP should be a requirement of the DCO.</p> <p>We agree that stockpiled soils should be labelled and protected from trafficking and</p>

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			<p>ensure topsoil units are restored to their original location', which is welcomed. The stockpiled soils should be labelled and protected from trafficking and damage. Any soil stockpiles in place for more than 6 months need to be seeded.</p> <ul style="list-style-type: none"> <li>• The restoration criteria need to be set out in the detailed SMP, including the restored ALC grade for all land within the Order Limits. This could be set out similarly to the proposals for mapping stored soils in section 7.1.2.</li> <li>• Section 8.7 of the oSMP sets out the details of the decommissioning requirements, however, Natural England consider that specific requirement for restoration of arable land to its former ALC grade, should be secured through the SMP. This would comprise an example of implementing good practice to assure restoration of the land to the baseline ALC grade, minimising the potential loss of soil functions.</li> <li>• Areas of the site which are not to be stripped or used for stockpiling, haul routes or compounds must be clearly</li> </ul>	<p>damage, with bunds that are planned to be retained for over six months being seeded. The majority of soil storage bunds will be retained for the operational phase of the solar farm.</p> <p>We note that the SMP should include retention of the existing baseline ALC Grade as a restoration criterion.</p> <p>We agree that areas of land that are not to have any soil stripping should be demarcated to prevent any unnecessary trafficking of vehicles or plant.</p> <p>The SMP will include measures to prevent damage to or loss of soil resource in the operational period, for instance the use of appropriate low ground pressure vehicles and monitoring of soil conditions.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>marked by signs and barrier tape and protected from trafficking and construction.</p> <ul style="list-style-type: none"> <li>The Scope of the oSMP should also be expanded to include the soil management of the soil which has remained in situ. Although there is no soil movement proposed in these areas, soil trafficking will occur during decommissioning and therefore mitigation measures need to be in place to minimise the potential impact on the soil resource, most notably soil compaction, which can have a major detrimental impact on the soil structure. This needs to be checked and monitored via aftercare.</li> </ul>	
NE-20	Ecology and Biodiversity	Ancient Woodland and Ancient/Veteran Trees	"We note that there is no Ancient Woodland or ancient/veteran trees within the order limits or within close proximity; as such, have no detailed comments to make."	The Applicant notes this comment.
NE-21	Site Description Transport and Access Socio-economics,	Connecting People with Nature	<p>"There are no National Trails, Open Access Land or Coast paths within the order limits; as such, no impacts to these features are likely.</p> <p>Public Rights of Way are discussed in depth within ES Chapter 8. We welcome the retention of all PRoW within the order limits and the intention to keep them open throughout all</p>	<p>The Applicant notes this comment and confirms that there are no National Trails, Open Access Land or Coast paths within the Order Limits.</p> <p>The Scheme will also provide extensive areas of mitigation along the existing sections of footpaths and bridleways to enhance their</p>



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
	Tourism and Recreation		<p>phases of the development. The poor existing provision of access routes around the sites is acknowledged, and thus we also welcome provision of an additional permissive footpath looping through West Burton 2. Nonetheless, we note that further provision for access across the site could be achieved through the development; in particular, additional access around areas proposed for Biodiversity Enhancement could provide and promote access to nature. ES section 8.9.44 notes the benefit the scheme will have to the existing PRowS on the site due to the addition of vegetation and boundary features. However it also notes the possible detrimental impact associated with the presence of the panels and infrastructure. The addition of interpretation boards and/or other features to improve public interpretation of the scheme and the biodiversity it supports would help to improve the overall effect on the PRow network.</p> <p>We also note the commitment to provide a Public Rights of Way Management Plan where any temporary closure is required during construction."</p>	<p>amenity value and benefit the public as a whole as demonstrated in <b>6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> (the 'LVIA') (see paragraphs 8.8.22 to 8.9.29). The proposed mitigation would apply to PRow receptors PR006 (Brox/198/1), PR007 (Brox/197/1), PR008 (Brox/196/1) and PR038 (Mton/68/1).</p> <p>Whilst it is acknowledged that the Scheme offers only a single additional permissive footpath, this is anticipated to provide a localised moderate-minor beneficial effect to recreational walking, and thus resultantly have a beneficial effect on health and wellbeing (para. 18.7.110 of <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b>), as a result of improved access to the countryside and semi-natural spaces. This beneficial effect will be experienced throughout the operational lifetime of the Scheme. Furthermore, the provision of the permissive path is secured through Requirement 17 of Schedule 2 to <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
NE-22	General	Examination	"Natural England does not intend to make oral representations regarding this examination but is happy to work with the applicant and examining authority to ensure the development will not have adverse impacts on the natural environment."	The Applicant notes this comment and has initiated engagement with Natural England through a Statement of Common Ground.
NE-23	Principle of Development (DCO) Landscape and Visual Impact Ecology and Biodiversity	Draft DCO	"Requirement 7 – Landscape and Ecological Management Plan:  Natural England welcomes the inclusion of a requirement for the LEMP; consider the measures as set out in the oLEMP to be satisfactory in protecting the elements of the natural environment which represent the key areas of our remit."	The Applicant notes this comment
NE-24	Principle of Development (DCO) Ecology and Biodiversity	Draft DCO	"Requirement 8 – Ecological Protection and Mitigation Strategy:  Natural England welcomes the inclusion of a requirement for the EPMS; consider the measures as set out in the oEPMS to be satisfactory in protecting the elements of the natural environment which represent the key areas of our remit."	The Applicant notes this comment
NE-25	Principle of Development (DCO)	Draft DCO	"Requirement 9 – Biodiversity Net Gain:  Natural England welcome the inclusion of a requirement for a Biodiversity Net Gain strategy to be produced, however, would recommend that this requirement makes it a necessity for a	As per Requirement 9 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> , "No part of the authorised development may commence until a biodiversity net gain strategy has been

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
	Ecology and Biodiversity		minimum of 10% Net Gains in habitat, hedgerow and river units to be delivered."	submitted to and approved by the relevant planning authority, in consultation with the relevant statutory nature conservation body."  The Applicant confirms that Requirement 9 in Schedule 2 will be amended to reflect a minimum of 10% Net Gains in habitat, hedgerow and river units.
NE-26	Principle of Development (DCO)	Draft DCO	"Requirement 13 – Construction Environment Management Plan:  Natural England welcomes the inclusion of a requirement for the CEMP; consider the measures as set out in the oCEMP to be satisfactory in protecting the elements of the natural environment which represent the key areas of our remit."	The Applicant notes this comment.
NE-27	Principle of Development (DCO)	Draft DCO	"Requirement 14 – Operational Environment Management Plan:  Natural England welcome the inclusion of a requirement for the OEMP."	The Applicant notes this comment.
NE-28	Principle of Development (DCO)	Draft DCO	"Requirement 17 - Permissive Paths:  Natural England welcome the specific requirement for the proposed permissive footpath; timing of it's opening"	The Applicant notes this comment.

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
NE-29	Principle of Development (DCO)	Draft DCO	<p>"Requirement 18 – Public Rights of Way:</p> <p>Natural England welcome the requirement for a Public Rights of Way Management plan to retain access throughout all development phases."</p>	The Applicant notes this comment
NE-30	Principle of Development (DCO)  Soils and Agriculture	Draft DCO	<p>Requirement 19 - Soils Management:</p> <p>Natural England welcome the requirement for production of a detailed soil management plan, however, we consider additional information must be included in the plan that is not currently outlined in the oSMP. Our specific comments on the contents of the SMP can be found in the section of this letter entitled 'Soils and best and most versatile agricultural land' (pages 7- 10).</p>	<p>A Soils Resource Management Plan, substantially in accordance with <b>6.3.19.2 Environmental Statement Appendix 19.2 Outline Soil Management Plan [APP-138]</b> will be submitted and approved prior to the commencement of development as secured by Requirement 19 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p> <p>Please see the Applicant's response to NE-14 (above) which addresses the matters raised by NE in detail.</p>
NE-31	Principle of Development (DCO)	Draft DCO	<p>"Requirement 21 - Decommissioning and Restoration:</p> <p>Natural England welcome the requirement for a decommissioning plan. As noted within our above comments on Soils and best and most versatile agricultural land, we consider the implementation of a time limit within the DCO would reduce the potential long-term impact on agricultural land and BMV land."</p>	<p>The decommissioning mitigation and site restoration measures set out in <b>7.2 Outline Decommissioning Statement [APP-310]</b> are secured by Requirement 21 in Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p> <p>The Applicant considers that the Draft DCO satisfactorily provides for the protection and restoration of agricultural land and BMV land post-decommissioning and that it would not be</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				appropriate to include a time limit within the DCO.

## 2.3 The Applicant's Responses to Other Statutory Consultees, International Agencies, Undertakers, and Elected Representatives

Table 2.3.1: Applicant's Response to 7000 Acres [RR-001]

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
7A-01	Principle of Development	Acceptability of the Scheme	"Overall, the limited energy security and decarbonisation benefits the West Burton Solar Project claims to achieve are outweighed by the significant adverse impacts it would have on the region (its communities, ways of life, landscape and its wildlife) and on the nation (in particular pressure on land use and food security)."	<p>Section 3.3 of <b>7.11 Statement of Need [APP-320]</b> describes Government's view that large capacities of low-carbon generation will be urgently required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar".</p> <p>It is the Applicant's view (and this aligns with Government's view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p> <p>Section 7 of <b>7.5 Planning Statement [APP-313]</b> concludes with a consideration of the Planning Balance and justifies how the overwhelming national need, as demonstrated in the Statement of Need, outweighs any potential significant adverse impacts which, as the <b>Environmental Statement [APP-039 to APP-061]</b> sets out, are limited, and will be considered by the Secretary of State in making a decision on the application.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
7A-02	Principle of Development (Location)	Cumulative Development	"The West Burton Solar Project (WBSP) is one of four NSIP proposals in West Lindsey, Lincolnshire, which fall within a 6 mile radius which together would cover 10,0000 [sic] acres of farmland and become the largest solar complex in Europe, and one of the top few globally."	<p>Paragraph 12.1.3 of <b>7.11 Statement of Need [APP-320]</b> concludes that "Large-scale solar generation is essential to support the urgent decarbonisation of the GB electricity sector" and paragraph 4.4.11 describes that the location of the Scheme presents a "highly suitable solution for the efficient delivery of solar at scale over timeframe which will provide significant decarbonisation benefits". It concludes that this Scheme and others located near it will all be essential for the decarbonisation of the UK electricity sector.</p> <p>Paragraph 8.5.10 and Section 8.5 more generally <b>[APP-320]</b> describe and express agreement with the Government's view that decentralised and community energy systems are unlikely to lead to the significant replacement of large-scale infrastructure. The Applicant therefore supports the Government's view that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p> <p>Paragraphs 3.3.17 and 3.3.18 <b>[APP-320]</b> set out the Government's view that irradiance, site topography and proximity to suitable connection points to the transmission network are likely to be key inputs to site selection. Section 7.5 <b>[APP-320]</b> describes the site selection process for large-scale solar more fully, and Section 7.7 <b>[APP-320]</b> sets out how the design of the Scheme seeks to</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>maximise utilisation of the grid connection capacity available at West Burton Substation.</p> <p>Chapter 9 <b>[APP-320]</b> describes the suitability of the proposed location as a point of connection for the Scheme, thus enabling it to contribute to the urgent need for increased energy security and a low-carbon electricity supply. The Applicant has secured an agreement to connect to the grid at West Burton substation as demonstrated in <b>7.7 Grid Connection Statement [APP-316]</b>.</p>
7A-03	General (Procedural)	Examination of Cumulative Development	<p>"Due to the unprecedented nature of this development and the significant impact on the area and communities, the four NSIP solar projects need to be considered together by the Planning Inspectorate, i.e. Cottam Solar Project, West Burton Solar Project, Gate Burton Energy and Tillbridge Solar."</p>	<p>The Applicant notes this comment and seeks to assure the Interested Party that a cumulative effects assessment has been prepared for the Application within the <b>Environmental Statement [APP-039 to APP-061]</b>.</p> <p>n</p>
7A-04	General (Consultation)	Public Consultation	<p>"The Public Consultation was insufficient/ inadequate. Information was lacking and misleading. Access to and comprehension of information for all was limited. Therefore, those affected were unable to gain understanding of the proposals."</p>	<p>The Applicant acknowledges this comment but is confident that the level of consultation undertaken, and information presented throughout the pre-application stage met the legislative requirements of the Planning Act 2008 and associated guidance. This has been evidenced in <b>5.1 Consultation Report [APP-022]</b>, which was submitted to the Planning Inspectorate and accepted for examination.</p> <p>For example, as described in Chapter 2 <b>[APP-022]</b>, the Applicant undertook two phases of</p>



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>community consultation to share information and invite feedback at different stages of Scheme development.</p> <p>Chapter 7 <b>[APP-022]</b> describes the Applicant's approach to statutory consultation, including consulting with relevant authorities on a draft Statement of Community Consultation. Table 7.1 sets out the comments received from authorities on the Applicant's approach to consultation and how the Applicant has had regard to these in developing the Scheme. Table 7.3 in Chapter 7 describes how the Applicant complied with commitments made in the Statement of Community Consultation when undertaking statutory consultation.</p> <p>Chapter 8 <b>[APP-022]</b> describes how the Applicant undertook a six-week statutory phase two consultation on the Scheme, during which the Applicant presented consultees with environmental information sufficient for consultees to understand the potential likely significant effects of the Scheme in a Preliminary Environmental Impact Report (PEIR). A non-technical summary was published to accompany the PEIR, with public information events and free-to-use communications channels open to help aid accessibility and understanding of the Scheme. A Consultation Summary Report for this phase of statutory consultation was published on the</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>dedicated Scheme website, shared with elected representatives and stakeholders and issued to over 9,000 properties within the vicinity of the Scheme, to help consultees understand how their feedback was being considered. A copy of the Phase Two Consultation Summary Report is provided at pp.36-43 of <b>5.7 Consultation Report - Appendix 5.7 Phase Two Community Consultation Materials - Part 3 of 3 [APP-031]</b>.</p> <p>Chapter 11 of <b>5.1 Consultation Report [APP-022]</b> describes the significant volume of responses received to Section 47 consultation (local community), including the issues raised and how the Applicant has had regard to these in developing the Scheme. This is further evidenced by <b>5.12 Consultation Report - Appendix 5.12 - Section 47 Applicant Response [APP-036]</b>.</p> <p>The host authorities have confirmed that the statutory consultation process was adequate <b>[AoC-001 to AoC-013]</b>.</p>
7A-05	Landscape and Visual Impact Glint and Glare	Cumulative Landscape and Visual Effects	"The proposed West Burton Solar Project would have a significant impact on visual amenity in its own right. The combined effect of four large solar farms in one area of Lincolnshire would be overwhelming; solar arrays would become a devastating, dominating feature of our landscape."	The Applicant respectfully disagrees with the Interested Party's comment and considers the approach taken and subsequent conclusions regarding assessing the impacts of the Scheme alongside the proposed Cottam, Gate Burton and Tillbridge Solar proposals would not result in significant adverse effects on landscape character and visual amenity over an extensive area.

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>The judgements on the likely significant cumulative effects and conclusions for the landscape and visual receptors are set out within Section 8.10 of <b>6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> (the 'LVIA'), <b>6.3.8.2 Environmental Statement - Appendix 8.2 Assessment of Potential Landscape Effects [APP-073]</b> and <b>6.3.8.3 Environmental Statement - Appendix 8.3 Assessment of Potential Visual Effects [APP-074]</b>. Summary I tables will be produced and submitted into the examination at Deadline 1 which will summarise the landscape and visual effects as concluded in the Environmental Statement.</p> <p>The cumulative effects with the Cottam proposals are illustrated on <b>6.4.8.17.1 Environmental Statement - Figure 8.17.1 - Cumulative Development Augmented ZTV - Cottam [APP-277]</b> Cottam is shown as being located to the northeast of the settlements of Stow and Willingham. This demonstrates that cumulative effects between these projects would therefore not occur due to the significant distance between them. The LVIA <b>[APP-046]</b> concludes that with Regional Character Areas and Individual Contributors to Landscape Character, there is potential for cumulative effects, but that these would be <b>Not Significant</b>. The LVIA sets out</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>(para. 8.10.86) for example, with regard to Viewpoint LCC-A-Middle Street that <i>"There may be opportunities (depending upon weather and atmospheric visibility) for successional glimpses of the West Burton and Cottam Sites. However, if available, this would be very glimpsed, transient and filtered by vegetation across the landscape and would be regarded as two detached solar schemes in two separate land parcels."</i></p> <p>The cumulative effects with the Gate Burton proposals are illustrated on <b>6.4.8.17.2 Environmental Statement - Figure 8.17.2 - Cumulative Development Augmented ZTV - Gate Burton [APP-278]</b>. Gate Burton is shown as being located to the west of the settlements of Willingham by Stow, Kexby and Upton. This demonstrates that the cumulative effects between these projects would not occur due to the significant distance between them. The LVIA <b>[APP-046]</b> concludes that with Regional Character Areas and Individual Contributors to Landscape Character, there is potential for cumulative effects, but that these would be <b>Not Significant</b>. The LVIA sets out (para. 8.10.88) for example, with regard to transport receptor T058/Northern Railway – Saxilby to Gainsborough that <i>"The route continues north through the Gate Burton Energy Park development, with users having views of the</i></p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p><i>surrounding array as they pass through", but that the effects would be <b>Not Significant</b>.</i></p> <p>The cumulative effects with the Tillbridge proposals are illustrated on <b>6.4.8.17.3 Environmental Statement - Figure 8.17.3 - Cumulative Development Augmented ZTV - Tillbridge [APP-279]</b>. Tillbridge is shown as being located to the west and east of the settlement of Springthorpe and situated between the settlements of Heapham, Hemswell Cliff and Glentworth. demonstrates that cumulative effects between these projects would therefore not occur due to the significant distance between them. The LVIA <b>[APP-046]</b> concludes that with Regional Character Areas and Individual Contributors to Landscape Character, there is potential for cumulative effects, but that these would be <b>Not Significant</b>. The LVIA sets out (para. 8.10.22) for example, with regard to location and proximity that <i>"The Tillbridge Solar Project continues from the northern extent of the Cottam 1 Site north towards the A631. The Cottam Solar Project is approximately 1.5km north of the West Burton 1 Site. The Tillbridge Solar Project is approximately 7.25km north of the West Burton 1 Site."</i></p> <p>All sites and development included within the cumulative assessment have been discussed and agreed with the host authorities. This is set out</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>within parts 8.4.1 to 8.4.3 of <b>6.3.8.4 Environmental Statement - Appendix 8.4 Consultation [APP-075]</b>. ES Appendix 8.4.1 documents engagement at the Scoping Stage with The Planning Inspectorate, Bassetlaw District Council, Canal &amp; River Trust, Clayworth Parish Council, Forestry Commission, Gringley on the Hill Parish Council, Lincolnshire County Council, West Lindsey District Council and Natural England (see pages 1 to 26). <b>ES Appendix 8.4.2</b> documents Section 42 Consultation engagement with Lincolnshire County Council, Bassetlaw District Council, West Lindsey District Council, National Farmers Union, Natural England, Fillingham Parish Council, Stow Parish Council, Canal and River Trust, Clayworth Parish Council, Marton and Gate Burton Parish Council and the Forestry Commission (see pages 1 to 44). <b>ES Appendix 8.4.3</b> documents engagement with other ES Topics such as cultural heritage (see pages 1 to 5).</p> <p>The mitigation proposals associated with the landscape and visual receptors for the Scheme are included in <b>7.3_A Outline Landscape and Ecological Management Plan Revision A [EN010132/EX1/WB7.3_A]</b> and within <b>6.4.8.18.1 to 6.4.8.18.3 Landscape and Ecology Mitigation and Enhancement Plans (Figures 8.18.1 to 8.18.3) [WB6.4.8.18.1_A to WB6.4.8.18.3_A]</b>. This mitigation takes into account the findings of the</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>cumulative assessment, and therefore the proposed mitigation has been designed to mitigate the cumulative effects identified. This mitigation is aimed at benefitting the community as a whole as well as tourists, visiting walkers, local residents, ornithologists and cyclists. The landscape mitigation measures will provide new planting, which will include new native hedgerows and tree cover, and this will also include their management and maintenance.</p> <p>Measures set out in the <b>7.3_A Outline Landscape and Ecological Management Plan Revision A [EN010132/EX1/WB7.3_A]</b> are secured through Requirement 7 in Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p>
7A-06	Landscape and Visual Impact  Socio-Economics, Tourism and Recreation  Other Environmental Matters (Human Health)	Health and Wellbeing and Cumulative Socio-Economic Effects	<p>"The WBSP has the potential to have a significant detrimental impact on the general health and wellbeing of residents (rural mental health is a particularly important issue locally), depriving access to visual amenity, changing views, destroying agricultural jobs and livelihoods. There is the possibility of socioeconomic decline from the cumulative effect and size of these developments, which would then affect people's health and wellbeing, which then has the long-term potential to impact on health inequality.</p>	<p><b>6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> (the 'LVIA') includes a full and detailed assessment that deals with both effects on the landscape itself and effects on the visual amenity of people, as well as interrelationships of these with other related topics in the ES. The LVIA process is iterative and as a result, the design of the Scheme has changed to respond to the findings of the assessment to ensure that landscape mitigation is fully incorporated into the Scheme.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			Such impacts have not been appropriately considered by Island Green Power."	<p>For example, the LVIA mitigation proposed has had regard to the need to consider the landscape character and visual amenity for the users of PRoW. This is set out in <b>6.3.8.3 Environmental Statement - Appendix 8.3 Assessment of Potential Visual Effects [APP-074]</b>. Public Rights of Way Receptor PR006 (Brox/198/1) on pp.907-909 <b>[APP-074]</b> shows in this instance that the Embedded Mitigation would include panels set a minimum of 15m from the adjacent PRoW. Native hedgerows within and on the boundaries of the WB1 Site will be retained and reinforced with new native trees, as secondary mitigation. Hedgerows would also be maintained at a taller height (c5m). The landscape proposals include provision for a new native woodland shelterbelt and scattered trees along the southern boundary of the WB1 Site. Once established, these measures, combined with the additional tree planting across the Site, would help break up the visual extent of the array, substation and associated infrastructure. During the spring and summer, when the vegetation is out in leaf, the hedgerows and trees would soften and filter views. Available views would be limited to transient views through gate entrances and over low hedgerows.</p> <p>In addition to the enhancement and retention of native hedgerows, other mitigation includes native shelter belts and woodland planting within</p>



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>the wider WB1 Site. These mitigation measures will help improve the landscape fabric. Newly planted trees and joined up intact hedgerows in the landscape would also help break up the flat arable fields.</p> <p>The Applicant is cognisant of the significance of the countryside for physical and mental wellbeing and, as such, likely impacts on the desirability and use of recreational facilities in the countryside, such as public rights of way, have been assessed in Section 18.7 of <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b>. The greatest level of effect to access, desirability and use of recreational facilities is limited to short- to medium-term moderate adverse effects on long distance recreational routes (the Trent Valley Way and National Byways) during construction (see Table 18.15 and para. 18.7.62). This is a <b>significant adverse</b> effect. This is however the only significant effect anticipated, with no greater than moderate-minor adverse anticipated to any other recreational receptor during construction (see paras. 18.7.60 to 18.7.69), or to any recreational receptor during operation (see paras. 18.7.107 to 18.7.117) and decommissioning (see paras. 18.7.147 to 18.7.157). These effects are not anticipated to be significant.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>This is re-iterated in Section 21.5 of <b>6.2.21 Environmental Statement - Chapter 21 Other Environmental Matters [APP-059]</b>.</p> <p>The cumulative effects of the identified schemes (including the four identified by 7000 Acres) are assessed in Section 18.10 of <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b>. The greatest level of cumulative effect to access, desirability and use of recreational facilities is anticipated during construction (see paras. 18.10.28 to 18.10.32). These effects are anticipated to be significant and adverse, albeit short-term for the cumulative construction phase only.</p> <p>The Applicant has assessed the level of impact on employment and the local economy from the Scheme in Section 18.7 <b>[APP-056]</b>, and the cumulative impacts from the identified projects (including those identified by 7000 Acres) in Section 18.10.</p> <p>The Scheme is anticipated to lead to a maximum loss of approximately 13 full-time equivalent agriculture jobs, as stated in paragraph 18.7.15 <b>[APP-056]</b>. The Scheme is estimated to employ 10 full-time equivalent employees from the local area during operation; see Table 18.16. The net change in employment and in economic</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>performance as measured by Gross Value Added (GVA) in the local area (defined as West Lindsey and Bassetlaw Districts) is:</p> <p>For construction: +432 FTE jobs (para. 18.7.21), +£20.0 million per year (para. 18.7.52);</p> <p>For operation: -2 FTE jobs(para. 18.7.81), +£1.5million per year (para. 18.7.99);</p> <p>For decommissioning: +324 FTE jobs (para. 18.7.129), minor beneficial impact to GVA (para. 18.7.139).</p> <p>The net peak cumulative changes to employment, and to economic Gross Value Added in the local area (defined as West Lindsey and Bassetlaw districts) are:</p> <p>For construction: +3,263 FTE jobs (para. 18.10.14), +£161.4 million per year (para. 18.10.26);</p> <p>For operation: -63 FTE jobs (para. 18.10.39), +£6.3million per year (para. 18.10.49);</p> <p>For decommissioning: +1,322 FTE jobs (para. 18.10.65), +£70.1 million per year (para. 18.10.74).</p> <p><b>[APP-056]</b></p> <p><b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b> assesses impacts on socio-demographic and health receptors both for West Burton Solar Project in isolation (Section 18.7), and</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				cumulatively with other schemes (Section 18.10). The full list of effects from the Scheme set out in Table 18.29 [APP-056] demonstrates no significant adverse effects to socio-demographic and human health indicators.
7A-07	Socio-Economics, Tourism and Recreation	Mitigation of Harm to Employment and Livelihoods	"The West Burton Solar Project fails to describe how proposed development could mitigate the harm through loss of employment and livelihoods caused by the development or contribute to local planning policies and actions to remedy the underlying socio-economic situation."	<p>The Applicant respectfully disagrees with this statement.</p> <p>The Scheme is anticipated to lead to a maximum loss of approximately 13 full-time equivalent agriculture jobs, as stated in paragraph 18.7.15 of document <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b>. The Scheme is estimated to employ 8 full-time equivalent employees from the local area during operation; see Table 18.16. The net change in employment in the local area (defined as West Lindsey and Bassetlaw Districts) during the Scheme's operational life is a loss of approximately 2 full-time jobs, once consideration of direct, indirect and induced employment, and impacts on the tourism and recreation industry are considered (see para. 18.7.81). Overall, the economic benefit to the local area is estimated to be £1.5 million per year (see para. 18.7.99).</p> <p>Section 18.6 [APP-056] describes the embedded mitigation measures ensuring adverse socio-</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>economic impacts from construction of the Scheme design are adequately mitigated. Furthermore, Section 18.8 [APP-056] describes further mitigation and enhancement measures, such as those set out in <b>7.10 Outline Skills Supply Chain and Employment Plan [APP-319]</b> which will be implemented during the operational lifetime and decommissioning phase of the Scheme as secured by Requirement 20 in Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p>
7A-08	General	Parish Council Opposition to the Scheme	<p>"All local Parish Councils and Meetings that have expressed a view to date are opposed to the proposed developments. Development at this scale, against the express wishes of local councils and their communities is undemocratic."</p>	<p>The Applicant notes this comment. As a result of the scale of the project, the Scheme is designated as a nationally significant infrastructure project, and the application is being made for a Development Consent Order. As such, the application and decision making processes are legislated for by the Planning Act 2008 (as amended). Section 103 of the Planning Act 2008 states "The Secretary of State has the function of deciding an application for an order granting development consent".</p> <p>The Applicant has a duty to consult the host local authorities (Section 42) and local communities (Section 47) prior to the application for a DCO.</p> <p>Local authorities have a statutory role in the DCO application process. As per Section 60 (2) of the</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>Planning Act 2008, the Secretary of State must give notice in writing to the host local authorities to invite them to submit a local impact report, where an application for an order granting development consent has been accepted.</p> <p>Furthermore, the Examining Authority has a duty to ensure that local authorities and interested parties are invited to attend the preliminary examination meeting (Section 88), hearings (Section 91-96), and to make written representations (Section 90) to be considered within the examination of the DCO application.</p> <p>The Applicant has undertaken two main consultation events, held in tandem with the Cottam Solar Project. The first, a six-week non-statutory consultation held from November to December 2021, received 525 feedback form responses, indicating 48% of those responding were in support of the proposals. The second was a six-week statutory consultation period in which approximately 700 responses were received by the Applicant team.</p> <p>The significant volume of feedback received through consultations, and how the Applicant has had regard to these responses, is presented in <b>5.1 Consultation Report [APP-022]</b>. The Applicant shared the results of consultation with consultees and communities following each</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>phase of consultation by publishing interim Consultation Summary Reports. The Applicant has taken an issue-led approach to considering comments, in order to incorporate feedback and address concerns where practicable.</p> <p>The Applicant is confident that the methods used, level of consultation undertaken and information presented throughout the pre-application stage met the legislative requirements of the Planning Act 2008 and associated guidance, which makes clear the importance of consulting local communities and parish councils. This is in <b>5.1 Consultation Report [APP-022]</b>, which was submitted to the Planning Inspectorate and accepted for examination.</p>
7A-09	Principle of Development Socio-Economics, Tourism and Recreation	Benefits of the Scheme to the Community	"The West Burton Solar Project will provide power to the National Grid rather than local homes. It will displace agricultural jobs, provide few employment opportunities, and reduce local amenity, providing little or nothing in return."	<p>The Applicant respectfully disagrees with this statement.</p> <p>Whilst not a direct and targeted local energy supply benefit, there is benefit to all UK citizens – including local communities – from the UK producing more clean, renewable electricity, in terms of affordability and energy security and resilience. This is considered further in detail in Sections 7.4, 8.7, 8.8, 8.10, 10.2, 10.3 and 11.5 of <b>7.11 Statement of Need [APP-320]</b>.</p> <p>Section 4.6 of <b>7.5 Planning Statement [APP-313]</b> details the 'Other Benefits of the Scheme', beyond</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>the national benefits as described through Sections 4.2 to 4.5 <b>[APP-313]</b>.</p> <p>Paragraph 4.6.1 <b>[APP-313]</b> states that the Scheme will result in a significant Net Gain for biodiversity (86.80% in habitat units, 54.71% in hedgerow units and 33.25% in river units). This is secured through Requirement 9 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>, which states that "No part of the authorised development may commence until a biodiversity net gain strategy has been submitted to and approved by the relevant planning authority, in consultation with the relevant statutory nature conservation body."</p> <p>Paragraph 4.6.1 of <b>7.5 Planning Statement [APP-313]</b> goes on to explain that a new permissive path from Track off Sykes Lane along the Codder Lane Belt and then south and west to rejoin Sykes Lane opposite Hardwick Scrub will be in place during the operational phase of the Scheme, thus improving local amenity.</p> <p>Paragraph 4.6.1 <b>[APP-313]</b> goes on to explain that a Skills, Supply Chain and Employment Plan, as secured by Requirement 20 in Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>, will be in place prior to construction and will set out the measures that the Applicant will implement to</p>



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>advertise and promote employment and training opportunities associated with the Scheme in construction and operation locally.</p> <p>Whilst not a part of the DCO Application, paragraph 4.8.1 of <b>7.5 Planning Statement [APP-313]</b> explains that the Applicant is committed to providing a Community Benefit Fund.</p> <p>The Scheme is anticipated to lead to a maximum loss of approximately 13 full-time equivalent agriculture jobs, as stated in paragraph 18.7.15 of document <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b>. The Scheme is estimated to employ 8 full-time equivalent employees from the local area during operation; see Table 18.16. The net change in employment in the local area (defined as West Lindsey and Bassetlaw Districts) during the Scheme's operational life is a loss of approximately 2 full-time jobs, once consideration of direct, indirect and induced employment, and impacts on the tourism and recreation industry are considered (see para. 18.7.81). Overall, the economic benefit to the local area is estimated to be £1.5 million per year (see para. 18.7.99).</p> <p>The overall employment and economic benefit to the local area from the two-year construction</p>

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				period is anticipated to be 432 full-time equivalent jobs (see para. 18.7.21), generating £20.0 million per year (see para. 18.7.52) <b>[APP-056]</b> .
7A-10	Landscape and Visual Impact  Socio-Economics, Tourism and Recreation  Other Environmental Matters (Human Health)	Impact on the Local Community	"Many small villages surrounded by the West Burton Solar Project have few opportunities for employment and very few amenities other than the open countryside landscape that it sits in. The scale of the WBSP would rob villages of this key attribute and erode the attractiveness of villages, driving some people away and serving to deter people from moving in, therefore reducing their capacity to sustain communities and populations."	<p>The Scheme comprises a series of separate areas of land or Sites (see Sections 3.3 to 3.5 of <b>6.2.3 Environmental Statement - Chapter 3 The Order Limits [APP-041]</b>) which are set within an extensive agricultural landscape. With large areas of land between each of the Sites, each is set apart by their associated features such as robust hedgerows, woodland and tree cover, intervening settlements and road and rail infrastructure (see paragraphs 8.5.115, 8.5.132 and 8.5.148 of <b>6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b>) (the 'LVIA').</p> <p>The layout of the Sites has been informed by a series of design parameters and include offset distances as a result of needing to balance the functionality of the Scheme against environmental considerations (see paragraph 8.6.21 of the LVIA).</p> <p>Paragraph 8.3.10 of the LVIA notes the [Secretary of State's] need to "<i>judge whether the visual effects on sensitive receptors, such as local residents, and other receptors, such as visitors to the local area, outweigh the benefits of the project</i>". The LVIA also</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>sets out details of the offsets that are proposed around sensitive receptors such as settlement edges, individual residential properties, PRoW and transport routes (see section 8.11) which aim to assist in the integration and dispersion of the Scheme across the landscape.</p> <p>The Applicant is cognisant of the significance of the countryside for physical and mental wellbeing and, as such, likely impacts on the desirability and use of recreational facilities in the countryside, such as public rights of way, have been assessed in Section 18.7 of <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b>. The greatest level of effect to access, desirability and use of recreational facilities is limited to short- to medium-term moderate adverse effects on long distance recreational routes (the Trent Valley Way and National Byways) during construction (see Table 18.15 and para. 18.7.62). This is a <b>significant adverse</b> effect. This is however the only significant effect anticipated, with no greater than moderate-minor adverse anticipated to any other recreational receptor during construction (see paras. 18.7.60 to 18.7.69), or to any recreational receptor during operation (see paras. 18.7.107 to 18.7.117) and decommissioning (see paras. 18.7.147 to</p>

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				18.7.157). These effects are not anticipated to be significant.  This is re-iterated in Section 21.5 of <b>6.2.21 Environmental Statement - Chapter 21 Other Environmental Matters [APP-059]</b> .
7A-11	Principle of Development  Landscape and Visual Impact	The Scheme and Cumulative Landscape and Visual Effects	"The large islands of development proposed for the West Burton Solar Project are, in terms of size, an order of magnitude larger than many of the villages they surround, i.e. Marton, Brampton, Sturton-by-Stow and Saxilby. This is compounded by there being 4 schemes within a close area. The partitioning of the countryside in this way effectively segregates rural villages and places them in an industrialised landscape."	The Applicant respectfully disagrees with the Interested Party's comment and considers the approach taken and subsequent conclusions regarding assessing the impacts of the Scheme alongside the proposed Cottam, Gate Burton and Tillbridge Solar proposals would not result in significant adverse effects on landscape character and visual amenity over an extensive area.  Please see the response to 7A-05 for further details on the cumulative effects assessment.
7A-12	Landscape and Visual Impact	Screening of the Scheme	"The West Burton Solar Project proposes solar panels which would have a height of 4.5m as well as extensive security fencing. At that height, the character of the land would undoubtedly be dominated by solar panels, which could not be adequately screened by hedgerows (at all) or by trees (for many years), Island Green Power propose to re-evaluate landscape and visual effects after 15 years, which represents a significant proportion of people's lives."	The assessment of both the landscape and visual effects of the 4.5m high solar panels is set out within Section 8.6 of <b>6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> (the 'LVIA') and within the detailed receptor sheets at <b>6.3.8.2 Environmental Statement - Appendix 8.2 Assessment of Potential Landscape Effects [APP-073]</b> and <b>6.3.8.3 Environmental Statement - Appendix 8.3 Assessment of Potential Visual Effects [APP-074]</b> .

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>The LVIA [APP-046] sets out proposals landscape mitigation which seek to enhance the landscape character of the Study Area and to reduce the visibility of the Scheme from residential properties and other public vantage points including transport routes, public footpaths, permissive footpaths and green lane network. This mitigation is aimed to benefit the community as a whole to enhance their way of life as well as green infrastructure (see paras. 8.4.44, 8.6.1, 8.6.3 and 8.8.3). Public consultation has also taken account of landscape and visual matters (see paras. 8.2.8 and 8.4.20).</p> <p>The visual effects are set out in <b>6.3.8.3 Environmental Statement - Appendix 8.3 Assessment of Potential Visual Effects [APP-074]</b>, which shows that some effects on visual receptors would be significant at construction and year 1 of operation, but with mitigation this is reduced across the majority of the landscape receptors to <b>Not Significant</b> at year 15 of operation.</p> <p>Year 15 is an acceptable year of assessment for setting the standard for mitigation measures and for predicting the findings of the assessment within the LVIA process. This is set out in recognised guidance' Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3) by the Landscape Institute and Institute</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				of Environmental Management & Assessment. This guidance states at paragraph 4.31 that <i>"Mitigation measures, especially planting schemes, are not always immediately effective. Advance planting can help reduce the time between the development commencing and the planting becoming established. If such planting forms part of the scheme design it should be included in the design and access statement and in the project description. Where planting is intended to provide a visual screen for the development it may be appropriate to assess the effects for different seasons and periods of time (for example, at year 0, representing the start of the operational stage, year 5 and year 15) in order to demonstrate the contribution to reducing the adverse effects of the scheme at different stages. In such projections the assumptions made about growth rates of planting should be clearly stated."</i>
7A-13	Cultural Heritage	ES Chapter: Baseline and Methodology	"The area in which the West Burton Solar Development is proposed is dotted with rural historic parishes, within which many historic buildings remain, including several dating as far back as the Domesday Book. The impact of the proposed scheme to heritage and such cultural assets has not been adequately explored or mitigated."	The Heritage Statement within <b>6.3.13.5 Environmental Statement - Appendix 13.5 [APP-117 to APP-119]</b> , provides a detailed assessment of all Grade II Listed Buildings and Conservation Areas within 2km of the Scheme, and all Grade I and II* Listed Buildings and Scheduled Monuments with a 5km study area surrounding the Scheme. <b>6.2.13 Environmental Statement - Chapter 13 Cultural Heritage [APP-051]</b> (see paragraphs. 13.5.11 to 13.5.22,

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>13.7.23 to 13.7.26, 13.7.45 to 13.7.46 and 13.8.5 to 13.8.8) provides further detailed assessment of the predicted impacts upon the historic built environment. The assessment identifies that there would be impacts to the settings of nine Listed Buildings during the construction phase, which are anticipated to be of <i>Negligible Adverse</i> magnitude in eight cases, and <i>Minor Adverse</i> magnitude in a single case, resulting in <i>Slight Adverse</i> effects in all nine cases, i.e., 'not significant'. During the operational phase, there would be impacts to the settings of nine Listed Buildings, two of which were scored as effects of <i>Neutral</i> significance, whilst three were scored as <i>Slight Adverse</i>. In addition to this, it was concluded that there would be impacts of <i>Minor Adverse</i> magnitude at four Grade II Listed Buildings and one Grade II* Listed Building, all of which would result in effects of <i>Slight Adverse</i> significance, i.e., 'not significant' in EIA terms.</p> <p>The LVIA has identified the need for extensive landscape mitigation that is set out in <b>7.3_A Outline Landscape and Ecological Management Plan Revision A [EN010132/EX1/WB7.3_A]</b> (as secured by Requirement 7 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>).</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p><b>6.2.13 Environmental Statement - Chapter 13 Cultural Heritage [APP-051]</b> (see paragraph 13.8.8) identifies that the landscape mitigation proposals (e.g., planting of shelter belts and scattered trees, planting of new hedgerows, existing hedgerow reinforcement) which should reach maturity by Year 15 would reduce <i>Slight Adverse</i> effects to <i>Neutral</i> at seven Listed Buildings (NHLE 1359490, NHLE 1064067, NHLE 1064084, NHLE1064096, NHLE 1047027, NHLE 1147032, and NHLE1359464), and six non-designated historic buildings (HB11, HB12, HB15, HB16, HB18, and HB19).</p>
7A-14	Transport and Access	The Scheme's and Cumulative Development's Impact upon the Local Road Infrastructure	<p>"The volume of road movements and size of vehicles, particularly during construction, maintenance and decommissioning are not compatible with the local, inadequate road infrastructure. Again, there is a cumulative affect with the potential for 4 major solar developments in the same region. The West Burton Solar Project does not adequately consider the impact of traffic through rural routes and villages and the potential for disruption, damage, and noise."</p>	<p>Impacts of the temporary construction traffic noise have been included and the likely impacts of noise and vibration have been assessed in Section 15.7 of <b>6.2.15 Environmental Statement - Chapter 15 Noise and Vibration [APP-053]</b> (See paragraphs 15.7.34 to 15.7.53)</p> <p>The Transport Assessment within <b>6.3.14.1_A Environmental Statement - Appendix 14.1 Transport Assessment Revision A [EN010132/EX1/WB6.3.14.1_A]</b> provides an assessment of the transport effects of the Scheme and concludes, through paragraphs 11.1 to 11.11, that the Scheme is acceptable from the perspective of transport effects.</p>



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				<p>An Outline Construction Traffic Management Plan (CTMP) has been prepared to support the application within <b>.3.14.2_A Environmental Statement - Appendix 14.2 Construction Traffic Management Plan Revision A [EN010132/EX1/WB6.3.14.2_A]</b> which is secured through Requirement 15 in Schedule 2 of the <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p> <p>The outline CTMP submitted as part of the DCO application provides a framework for the management of construction vehicle movements to and from the Scheme, to ensure that the effects of the temporary construction phase on the local highway network are minimised and made acceptable. <b>.3.14.2_A Environmental Statement - Appendix 14.2 Construction Traffic Management Plan Revision A [EN010132/EX1/WB6.3.14.2_A]</b> covers:</p> <ul style="list-style-type: none"> <li>Construction methodology;</li> <li>Site access;</li> <li>Construction vehicle trip generation;</li> <li>Construction vehicle routing;</li> <li>Abnormal load movement; and</li> <li>Mitigation and management measures.</li> </ul>

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				By example, measure 'xx' in Section 7 of <b>6.3.14.2_A Environmental Statement - Appendix 14.2 Construction Traffic Management Plan Revision A [EN010132/EX1/WB6.3.14.2_A]</b> is for a road condition survey. This will ensure that any identified highways defects resulting from construction activities associated with the Scheme will be corrected to the satisfaction of the local highway authority.
7A-15	Energy Need Principle of Development Planning Policy Soils and Agriculture	The Scheme's and Cumulative Development's Impact upon Energy Security and Food Security	"The land proposed to be developed for the West Burton Solar Project is productive arable land, as is the land associated with the three other large solar developments in the region. The impact of the West Burton Solar Project, and the cumulative impact of the 4 schemes on Food Security has not been considered, particularly in light of the circumstances of war, pandemic, crop disease and global warming (e.g. rising sea levels) on national and global supply chains."	Section 3.3 of <b>7.11 Statement of Need [APP-320]</b> describes Government's view that large capacities of low-carbon generation will be urgently required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar". It is the Applicant's view (and this aligns with Government's view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.  Further, Table 7.1 [APP-320] shows the electricity generated per hectare by different low carbon technologies. At the UK's average solar load factor (11%), solar generation produces much more energy per hectare than biogas, and generates a similar amount of energy as onshore wind. The Applicant does not consider that the

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				Scheme would result in adverse food security impacts either alone or cumulatively. The UK annual balance of domestically produced food is sensitive to non-planning factors including weather and markets. The relevant assessment for policy purposes (and therefore decision-making purposes under the Planning Act 2008) is one that is based on the grade of the agricultural land, rather than its current use and the intensity of that use. In terms of key threats to UK food security, the Defra UK Food Security Report highlights that the main threat is climate change.
7A-16	Climate Change Soils and Agriculture	Agricultural Land use and Food Production	"The proposed area covered by the West Burton Solar Project is productive agricultural land, producing food for people and animals, as well as biofuels. The overall sustainability impact of displacing this production has not been considered, in terms of what production will be lost and the additional food miles and carbon impact of production being required elsewhere."	It is the Applicant's view that the concerns raised regarding solar farm effects on food security and sustainability, are misplaced.  <b>6.2.7_A Environmental Statement - Chapter 7 Climate Change Revision A</b> <b>[EN010132/EX1/WB6.2.7_A]</b> demonstrates that the effect of reduced reliance on fossil fuels would result in a significant reduction in CO2e emissions. It is considered that this analysis is sufficient to demonstrate that any additional emissions from food miles and production would not outweigh the positive effect of the scheme in operation. Defra's report on food security issues for the UK, <a href="https://www.gov.uk/government/statistics/united-kingdom-food-security-report-2021">https://www.gov.uk/government/statistics/united-kingdom-food-security-report-2021</a> is clear that prominent risks to UK food security include climate change and soil

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				<p>degradation. As noted in paragraph 19.9.14 of <b>6.2.19 Environmental Statement – Chapter 19 Soils and Agriculture [APP-057]</b>, the reversion of arable land to pasture below a solar farm is very effective at enabling recovery of soil organic matter, degraded by repeated cultivation.</p> <p>Forestry Commission data shows that the most productive biofuel crops produce significantly less MWh/ha than a solar farm  <a href="https://www.forestryresearch.gov.uk/tools-and-resources/fthr/biomass-energy-resources/reference-biomass/facts-figures/potential-yields-of-biofuels-per-ha-p-a/">https://www.forestryresearch.gov.uk/tools-and-resources/fthr/biomass-energy-resources/reference-biomass/facts-figures/potential-yields-of-biofuels-per-ha-p-a/</a>.            Therefore, to generate a MWh of electrical power, biofuel cropping displaces a greater area of arable production than solar.</p>
7A-17	Ecology and Biodiversity	Wildlife Impact and Biodiversity Net Gain	"The details provided by Island Green Power to date do not provide a thorough assessment of the potential harm to the ecology and biodiversity of the area. In addition, Solar farm biodiversity net gain claims are unproven in the UK at this scale."	<p><b>6.2.9 Chapter 9 of the Environmental Statement [APP-047]</b> sets out the extensive findings of all ecological investigations undertaken within the Order Limits together with an appraisal of the relative importance of each species or species group, habitat or designated site. This survey scope has been formulated through consultation with Natural England as well as Lincolnshire and Nottinghamshire Wildlife Trusts and has been deemed to be thorough and appropriate.</p>

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				<p>A comprehensive package of mitigation has been provided, in tandem with embedded mitigation which is secured through the ecologically sensitive design of the Scheme (including measures such as the wide buffering of all field boundaries and the use of existing hedgerow gaps for accesses).</p> <p>These measures are further detailed within <b>7.17 Outline Ecological Protection and Mitigation Strategy [APP-326]</b> (as secured by Requirement 8 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>) and <b>7.3_A Outline Landscape and Ecological Management Plan Revision A [EN010132/EX1/WB7.3_A]</b> (as secured by Requirement 7 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>) which will ensure that all identified impacts are avoided or minimised as far as possible.</p> <p>In many cases, the reversion from intensive agriculture to pasture or meadow grassland with additional hedgerow, scrub, tree and wetland habitat creation will bring about positive effects for wildlife. In particular, terrestrial and aquatic invertebrates, botanical diversity, small mammals and many species of bird all stand to benefit.</p>

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				<p>In this way, a substantive net gain for biodiversity will be achieved (see <b>6.3.9.12 Environmental Statement - Appendix 9.12 Biodiversity Net Gain Report [APP-088]</b>), predominantly through the creation of extensive low-input grassland resulting in a net gain of 86.80% in habitat units, but also several new ponds and wetland habitat parcels resulting in a net gain of 33.25% in river units, and the planting of several kilometres of species-rich hedgerow resulting in a net gain of 54.71% in hedgerow units.</p> <p>This is secured through Requirement 9 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>, which states that "No part of the authorised development may commence until a biodiversity net gain strategy has been submitted to and approved by the relevant planning authority, in consultation with the relevant statutory nature conservation body."</p>
7A-18	Principle of Development	Period for Construction, Operation and decommissioning of the Scheme.	"Between the operational period of up to 40 years, plus a period of construction and decommissioning, a life-cycle of the development of around 50 years could never be classed as temporary."	Once the Scheme ceases to operate, it will be decommissioned. A 40-year period for the operational phase of the Scheme has been assessed in the EIA and reported in the ES (see paragraph 2.4.9 of <b>6.2.2 Environmental Statement - Chapter 2 EIA Process and Methodology [APP-040]</b> ).

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				<p>Decommissioning is estimated to be no earlier than 2066 (see paras. 3.3.15 to 3.3.18 of <b>7.5 Planning Statement [APP-313]</b>).</p> <p>Decommissioning is expected to take between 12 and 24 months. A 24-month decommissioning period has been assumed for the purposes of a worst-case assessment in the ES, (See paragraph 4.3.6 of <b>6.2.4 Environmental Statement - Chapter 4 Scheme Description [APP-042]</b>). In addition, the majority of the agricultural land can remain in productive use through the operational period, being grazed by livestock (see paras 19.3.3, 19.3.4, 19.10.2, 19.10.6, 19.10.10 of <b>6.2.19 Environmental Statement - Chapter 19 Soils and Agriculture [APP-057]</b>).</p>
7A-19	<p>Site Description</p> <p>Alternatives and Design Evolution</p> <p>Landscape and Visual Impact</p>	Design Parameters of the Scheme	"The project design fails to consider or mitigate the impact of the large individual parcels of the West Burton Solar Project, each of which dwarfs the villages they surround."	<p>The Scheme comprises a series of separate areas of land or Sites (see Sections 3.3 to 3.5 of <b>6.2.3 Environmental Statement - Chapter 3 The Order Limits [APP-041]</b>) which are set within an extensive agricultural landscape. With large areas of land between each of the Sites, each is set apart by their associated features such as robust hedgerows, woodland and tree cover, intervening settlements and road and rail infrastructure (see paragraphs 8.5.115, 8.5.132 and 8.5.148 of <b>6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b>) (the 'LVIA').</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>The layout of the Sites has been informed by a series of design parameters and include offset distances as a result of needing to balance the functionality of the Scheme against environmental considerations (see paragraph 8.6.21 of the LVIA [APP-046]).</p> <p>Paragraph 8.3.10 of the LVIA [APP-046] notes the [Secretary of State's] need to "judge whether the visual effects on sensitive receptors, such as local residents, and other receptors, such as visitors to the local area, outweigh the benefits of the project". The LVIA also sets out details of the offsets that are proposed around sensitive receptors such as settlement edges, individual residential properties, PRow and transport routes (see section 8.11) which aim to assist in the integration and dispersion of the Scheme across the landscape.</p>
7A-20	Landscape and Visual Impact Cultural Heritage Socio-Economics, Tourism and Recreation	Effects of the Scheme on Tourism	<p>"Development at the scale of the West Burton Solar Project would alter the character and appeal of the region to attract visitors, tourists, or new people to the region, particularly when considered in the context of the 4 proposed large solar developments. The development would be clearly visible from historic buildings, such as Lincoln Castle and Lincoln Cathedral. The project has failed to assess the potential impact of the development in this important regard."</p>	<p>Section 18.7 of <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b> assesses the likely impacts on recreational use of the land and facilities therein, and the potential impacts to the visitor economy from the construction, operation, and decommissioning of the Scheme.</p> <p>The greatest effects during construction are anticipated to be a medium-term temporary moderate adverse effect on the landscape setting</p>



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>of tourism attractions (see para. 18.7.57), and a short- to medium-term temporary moderate adverse effect on the Trent Valley Way and National Byways long distance recreational routes (see Table 18.15 and para. 18.7.62). These effects are therefore both <b>significant adverse</b>.</p> <p>During operation, the greatest effects to tourism and recreation receptors are anticipated to be long-term moderate-minor adverse (see para. 18.7.102-117), which is not significant in EIA terms.</p> <p>Furthermore, Section 18.10 <b>[APP-056]</b> assesses the likely cumulative impacts on tourism and recreation receptors during construction (para. 18.10.28 to 18.10.32), operation (para. 18.10.51 to 18.10.55), and decommissioning (Table 18.29). There are no additional significant effects to tourism and recreation receptors as a result of the cumulative impact from the Scheme and surrounding projects.</p> <p><b>6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> (the 'LVIA') takes account of the landscape and visual features that are likely to appeal to visitors, tourists or new people to the region. The LVIA also takes account of intervisibility between the Scheme and Lincoln Castle and Lincoln Cathedral.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>Detailed overlap and consultation with the heritage topic lead has also been undertaken when developing the landscape and visual baseline and in identifying landscape and visual effects for the LVIA [APP-046] in the context of heritage receptors and this is set out in the responses within <b>6.3.8.4.3 Environmental Statement - Appendix 8.4 Consultation [APP-075]</b>.</p> <p>The extent of the Study Area has been determined in accordance with recognised LVIA methodology to encompass all receptors that may experience significant effects. In light of the nature of the surrounding terrain with some elevated viewpoints, the assessment has considered the potential for landscape and visual receptors to be affected that are close to but outside the 5km buffer area.</p> <p>Additional views within the LVIA [APP-046] suggested by the Canal &amp; River Trust, Lincolnshire County Council and Bassetlaw District Council that take account of locations where heritage assets may be affected have been taken into account at Section 8.2. This includes viewpoint VP35 that is representative of views from the Fossdyke Canal in addition to viewpoints VP35 and VP49 taken next to water spaces. This assessment has included boaters as a receptor at low speed as their users are likely to be as</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>impacted as walkers and horse riders. In addition, boaters mooring on the Fossdyke Canal, who may be in situ for long term, are also taken into account in the LVIA.</p> <p>The LVIA has also included the River Trent as a visual receptor with viewpoints VP49 and LCC-C-K, which are representative viewpoints along this river corridor. For West Burton 3, Bassetlaw District Council also suggested adding Torksey Viaduct as viewpoint LCC-C-N, given it sits at a higher elevation.</p> <p>The LVIA has also taken account of recognised documents and guidance such as The Historic Landscape Character Assessment of the County of Lincolnshire (September 2011) to ensure the Scheme is sensitive to the historic landscape. The relevant section for West Burton is TVL1 – The Northern Cliff Foothills.</p> <p>There are potential long distance views to Lincoln Cathedral and Lincoln Castle and while Lincoln lies approximately 8.5km to the southeast of West Burton 1 and West Burton 2, the intervisibility between the Sites and the Study Area have been taken into consideration in the LVIA (paras. 8.4.11 and 8.5.77) <b>[APP-046]</b>.</p> <p><b>6.3.13.5 Environmental Statement - Appendix 13.5 Heritage Statement [APP117-119], and</b></p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p><b>6.2.13 Environmental Statement - Chapter 13 Cultural Heritage [APP-051]</b> adopted a 5km study area for the assessment of heritage assets 'of the highest significance', as it was considered that any visual impacts that might occur beyond this distance would result in impact of, at worst, <i>Negligible</i> magnitude, and therefore 'not significant'.</p>
7A-21	<p>Transport and Access</p> <p>Socio-Economics, Tourism and Recreation</p>	<p>Effects of the Scheme on Leisure and Recreation</p>	<p>"There is an extensive network of footpaths, bridleways and isolated rural roads within the area covered by the West Burton Solar Project, which are used for walking, cycling, and horse-riding. The direct impact of the West Burton Solar Project, and the combined impact of the 4 proposed large solar projects on leisure and recreation have not been adequately considered."</p>	<p>The Applicant is cognisant of the significance of the countryside for physical and mental wellbeing and, as such, likely impacts on the desirability and use of recreational facilities in the countryside, such as public rights of way, have been assessed in Section 18.7 of <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b>.</p> <p>The greatest effect to recreational facilities is anticipated to be during construction. This is anticipated to be a short- to medium-term temporary moderate adverse on the Trent Valley Way and National Byways long distance recreational routes (see Table 18.15 and para. 18.7.62). This effect is therefore <b>significant</b>.</p> <p>The greatest level of effect to access, desirability and use of any other recreational facilities at any other stage of the Scheme's lifetime is moderate-minor adverse during construction (see para. 18.7.64 to 18.7.69), operation (see para. 18.7.107</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>to 18.7.115), and decommissioning (see para. 18.7.147 to 18.7.157). These effects are therefore not significant.</p> <p>Section 18.10 <b>[APP-056]</b> assesses the likely cumulative impacts on tourism and recreation receptors during construction (para. 18.10.28 to 18.10.32), operation (para. 18.10.51 to 18.10.55), and decommissioning (Table 18.29) and concludes no additional significant effects are likely to be generated.</p> <p>As set out in para.4.5.93 in <b>6.2.4 Environmental Statement - Chapter 4 Scheme Description [APP-042]</b>, the permissive path running from the track off Sykes Lane along the Codder Lane Belt and then south and west to re-join Sykes Lane opposite Hardwick Scrub will contribute to the wider network of footpaths in the area and facilitate greater public access to the countryside.</p>
7A-22	General (Procedural)	Cumulative Assessment	"Because of the unprecedented nature of this development and the significant impact on the area and communities, the four NSIP solar projects should be considered together by the Planning Inspectorate, i.e. Cottam Solar Project, West Burton Solar Project, Gate Burton Energy and Tillbridge solar."	The Applicant notes this comment.
7A-23	Planning Policy	Policy Accordance with	"The project does not consider the detailed work by communities in developing approved neighbourhood plans, including, for example	The Scheme has been assessed against relevant local planning policies as set out at paragraphs 5.9.2 and 5.9.3 of <b>7.5 Planning Statement [APP-</b>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
		Neighbourhood Plans	aspirations for green spaces, open landscapes and the rural nature of villages."	<b>341]</b> . Appendix 3 therein, the 'Local Planning Policy Accordance Table', sets out the relevant adopted and draft Neighbourhood planning policies in full and sets out the accordance of the Scheme against the policies.
7A-24	Planning Policy Energy Need Alternatives and Design Evolution	Land Use	"While there is a clear case for solar playing a role in decarbonisation, there is no clear case for extensive displacement of farmland through the installation of large-scale ground-mounted solar farms."	<p>Section 3.3 of <b>7.11 Statement of Need [APP-320]</b> describes Government's view that large capacities of low-carbon generation will be urgently required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar". It is the Applicant's view (and this aligns with Government's view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p> <p>Section 7.6 <b>[APP-320]</b> demonstrates that large-scale solar is the most efficient use of land for energy generation purposes.</p> <p>Paragraphs 6.2.17 - 6.2.19 of <b>7.5 Planning Statement [APP-313]</b> explain that it is against this backdrop that NPS EN-1 paragraph 4.1.2 sets a presumption in favour of granting permission for energy NSIP projects. This is carried through to Draft NPS EN-1 at paragraphs 4.1.2 and 4.1.3.</p> <p>Section 6.2 <b>[APP-313]</b> sets out how the Scheme will meet the compelling need for renewable</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>energy in accordance with relevant national planning policies. In summary, the Scheme would:</p> <ul style="list-style-type: none"> <li>• Deliver a large amount of renewable generation capacity (35,590,658 MWh over the estimated 40-year assessed lifetime) to deliver the Government's energy objectives and legally binding net zero commitments in line with the requirements of paragraph 1.1.1 of NPS EN-3, paragraph 3.3.21 of draft NPS EN-1, section 3.4 of NPS EN-1 and the National Infrastructure Strategy 2020 (para. 6.2.32);</li> <li>• Deliver a reduction of 5,974,155 tCO<sub>2</sub>e over the lifetime of the Scheme compared to if it did not go ahead which would make a significant contribution towards reducing carbon emissions as required by paragraph 1.1.1 of NPS EN-1, paragraph 2.3.3 of Draft NPS EN-1, the National Infrastructure Strategy 2020 and the Energy White Paper: "Powering our net zero future" (para. 6.2.35);</li> <li>• Deliver in a timescale that is short in the context of the delivery of other forms of energy generation in line with the urgent need to decarbonise set out in paragraphs 3.3.5, 3.3.15 and 3.4.5 of NPS EN-1,</li> </ul>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>Paragraph 2.3.3 of Draft NPS EN-1 and the National Infrastructure Strategy 2020 (paras. 6.2.1, 6.2.4 and 6.2.8);</p> <ul style="list-style-type: none"> <li>• Enable all consumers to benefit from the effect of low-marginal cost solar generation by reducing market prices, in line with the aim to provide affordable energy for consumers set out at Paragraph 2.3.3, Paragraph 2.3.6 and 3.3.20 of Draft NPS EN-1 (para 6.2.8, 6.2.9, and 6.2.10);</li> <li>• Help ensure security and reliability of energy supply in line with Paragraph 2.3.3 and 2.3.6 of the Draft NPS EN-1 (para 6.2.8 and 6.2.9).</li> </ul> <p>The selection of the Scheme's location has followed a systematic step-by-step process as set out in detail within <b>WB6.3.5.1_A Environmental Statement - Appendix 5.1 Site Selection Assessment Revision A [AS-004]</b>. This took a sequential approach to the consideration of potential sites in terms of agricultural land classification. As a result, paragraph 3.3.22 states that the Scheme maximises the utilisation of low grade, non best and most versatile (BMV) agricultural land with 73.76% of the land being classified as non BMV land.</p>



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
7A-25	Planning Policy	National Planning Policy Accordance	"The proposed project has failed to follow the requirements of the current and draft National Policy Statements in a number of areas."	<p>The Applicant respectfully disagrees with this statement and invites the Interested Party to specify which policies it considers the application is not compliant with.</p> <p>Section 6 of <b>7.5 Planning Statement [APP-313]</b> demonstrates that when considered against existing and emerging national planning policies, the Scheme accords with the relevant policies. With regard to specific policy tests, the substantial benefits of the Scheme are considered, on balance, to outweigh its limited number of significant residual adverse impacts. Therefore, it is considered that development consent for the Scheme should be granted.</p>
7A-26	Principle of Development Planning Policy Alternatives and Design Evolution	Nature of the Scheme	"Many planning requirements call for effective land use, the re-use of brownfield sites and avoiding BMV crop land. The West Burton Solar Project uses no brownfield sites. Given the limited contribution to decarbonisation and the adverse consequences arising from using farmland at this scale, the West Burton Solar Project represents a grossly inefficient use of land in the face of ever-increasing pressures on its use."	<p>Section 3.3 of <b>7.11 Statement of Need [APP-320]</b> describes Government's view that large capacities of low-carbon generation will be urgently required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar".</p> <p>Section 7.6 <b>[APP-320]</b> analyses the potential contribution of "brownfield" solar sites to the national need for solar generation. Brownfield sites, including rooftop and other community energy systems, are likely to grow in the UK and will make a contribution to decarbonisation of the</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>UK energy system. However, the Statement of Need concludes that on their own, brownfield developments are unlikely to be able to meet the national need for solar. Section 8.5 of the Statement of Need describes and agrees with Government's view that decentralised and community energy systems are unlikely to lead to the significant replacement of large-scale infrastructure. It is the Applicant's view (and this aligns with Government's view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p> <p>The consideration of alternatives has been undertaken within <b>6.2.5 Environmental Statement - Chapter 5 Alternatives and Design Evolution [APP-043]</b> and its accompanying appendix <b>WB6.3.5.1_A Environmental Statement - Appendix 5.1 Site Selection Assessment Revision A [AS-004]</b>. Specifically, paragraphs 2.1.23 to 2.1.31 <b>[AS-004]</b> detail the consideration of brownfield land and roof tops and sets out why these were discounted as unsuitable. The methodology used for the site selection process is considered reasonable and proportionate and complies with the requirements of NPS EN-1 4.4.3.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
7A-27	Soils and Agriculture	Confidence in the Scheme's Agricultural Land Classification	"The group does not have confidence in the Agricultural Land Classification data published by Island Green Power for the West Burton Solar Project. Given the potential for a margin of error or change in the developer's ALC figures, it is imperative that there is an independent soil analysis conducted to establish the accurate picture and to be certain of the methodology that has been followed. Aside from the sub-classification of land between 3a and 3b, there is also debate within the Government that all grade 3 land should be included in BMV. The application of the ALC classification only is flawed as it does not consider crop yield."	<p>There is no suggestion from Government that ALC Grade 3b land should be considered Best and Most Versatile (BMV) land for planning purposes, solar farms or otherwise.</p> <p>The ALC assessment presented by the Applicant <b>(6.3.19.1 Environmental Statement - Appendix 19.1 Agricultural Land Quality, Soil Resources and Farming Circumstances Report [APP-137])</b> is the result of a detailed field survey following the guidance given in Natural England's TIN049 (appendix 19.1 paragraph 2.1.5) and the MAFF ALC Guidelines (paragraph 2.1.2). Natural England retain ALC experts who will appraise the evidence presented by the Applicant. 7000 Acres have not given any rationale for their lack of confidence in the ALC assessment presented.</p>
7A-28	Planning Policy Alternatives and Design Evolution	Site Selection Consideration	"The proposed project fails in that reasonable alternatives have not been adequately considered, as is required by the EIA regulations and the National Policy Statements."	<p>The consideration of alternatives has been undertaken within <b>6.2.5 Environmental Statement - Chapter 5 Alternatives and Design Evolution [APP-043]</b>. This includes the consideration of alternative sites (Section 5.5), alternative technologies (Section 5.6), alternative layouts (Section 5.7), alternative substation locations (section 5.8) and alternative cable routes (Section 5.9).</p> <p>The selection of the Scheme's location has followed a systematic step-by-step process as set out in detail within <b>WB6.3.5.1_A Environmental</b></p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p><b>Statement - Appendix 5.1 Site Selection Assessment Revision A [AS-004].</b> This took a sequential approach to the consideration of potential sites in terms of agricultural land classification. As a result, paragraph 3.3.22 states that the Scheme maximises the utilisation of low grade, non best and most versatile (BMV) agricultural land with 73.76% of the land being classified as non BMV land.</p> <p>Paragraphs 2.1.23 to 2.1.31 <b>[AS-004]</b> detail the consideration of brownfield land and roof tops and sets out why these were discounted as unsuitable. The methodology used for the site selection process is considered reasonable and proportionate and complies with the requirements of NPS EN-1 4.4.3.</p> <p>The land required for the Scheme has been demonstrated to perform better than 8 of the assessed Potential Development Areas (PDAs) and equal to the remaining one following the site selection process (see Annex E <b>[AS-004]</b>). Consequently, there are no obviously more suitable locations for the Scheme within the Search Area.</p>
7A-29	Energy Need Principle of Development	The Scheme's Acceptability as an NSIP	"Given the load factor of solar in the UK and the intermittency of power produced – and the fact that the development would provide no power when the country would most need it on winter	The Scheme is automatically deemed nationally significant due to its size (i.e being a generating station with a capacity of > 50MW in accordance with Section 15 (2) of the Planning Act 2008.

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>evenings (i.e. it could not be relied upon when needed), its status of "National Significance" or strategic importance is questionable, and it is therefore a misuse of the NSIP process to develop the project in this way."</p>	<p>Section 3.3 of <b>7.11 Statement of Need [APP-320]</b> describes Government's view that large capacities of low-carbon generation will be urgently required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar".</p> <p>It is the Applicant's view (and this aligns with Government's view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p> <p>Energy is consumed at all times of the day and night. Paragraph 8.9.3 <b>[APP-320]</b> explains that in 2021, BEIS (now DESNZ) unveiled plans to decarbonise UK power system by 2035. The plans focus on building a secure, home-grown energy sector that reduces reliance on fossil fuels and exposure to volatile global wholesale energy prices and solar is part of that solution.</p> <p>Further, Table 7.1 <b>[APP-320]</b> shows the electricity generated per hectare by different low carbon technologies. At the UK's average solar load factor (11%), solar generation produces much more energy per hectare than biogas, and generates a similar amount of energy as onshore wind.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
7A-30	Principle of Development (DCO)  Alternatives and Design Evolution	Draft DCO  Site Selection	"Given the flawed arguments surrounding the potential benefits of the WBSP development, as well as the failure of the developer to consider alternatives which would have fewer adverse impacts, the WBSP does not meet the necessarily high threshold to allow compulsory purchase."	The Applicant respectfully disagrees with this statement.  The justification for the use of compulsory acquisition powers is set out within sections 7 and 8 of <b>4.1 Statement of Reasons [APP-019]</b> . The Applicant considers the use of compulsory acquisition powers to be necessary and proportionate, and required as a last resort in order to ensure the deliverability of this nationally significant infrastructure project, should the Applicant not be able to secure voluntary agreements with affected landowners.
7A-31	General  Principle of Development	The Application	"Accuracy and fullness of information provided by IGP: Supporting information provided by IGP's consultants and experts is partial and fails to objectively consider all aspects and implications of the development."	Paragraphs 1.4.5 and 1.4.6 of <b>6.2.1 Environmental Statement - Chapter 1 Introduction [APP-039]</b> explain that a Preliminary Environmental Information Report (PEIR) was prepared and published in June 2022 to satisfy the requirement of the EIA Regulations where it is stated that a PEIR "is reasonably required for the consultation bodies to develop an informed view of the likely significant environmental effects of the development (and of any associated development)".  The Planning Inspectorate has since accepted the Application for examination on 18 April 2023 which signifies that the information provided by the Applicant is sufficient to progress the DCO Application into examination.

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
7A-32	Principle of Development Energy Need Soils and Agriculture	Cumulative Development	"The combined impact of all solar developments in the region (NSIP and locally determined developments) would take a significantly higher proportion of land locally than the national average figure quoted by solar developers to illustrate how little land would be used by solar, thus the impact on the region would be disproportionate."	<p>Section 3.3 of <b>7.11 Statement of Need [APP-320]</b> describes Government's view that large capacities of low-carbon generation will be urgently required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar".</p> <p>It is the Applicant's view (and this aligns with Government's view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p> <p>Table 7.1 <b>[APP-320]</b> shows the electricity generated per hectare by different low carbon technologies. At the UK's average solar load factor (11%), solar generation produces much more energy per Ha than biogas, and generates a similar amount of energy as onshore wind.</p> <p>Paragraph 7.6.9 <b>[APP-320]</b> describes Government's anticipated range of 2 to 4 acres for each MW of output generally required for a solar farm along with its associated infrastructure. The Proposed Development as proposed delivers a large-scale solar generation asset which is consistent with this range.</p>
7A-33	Principle of Development	Nature of the Scheme	"That matching electricity supply with demand in the moment is an essential part of electricity supply, the WBSP cannot deliver on claims to	Section 3.3 of <b>7.11 Statement of Need [APP-320]</b> describes Government's view that large capacities of low-carbon generation will be urgently

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
	Energy Need		power approximately 144,000 homes owing to the low overall load factor for solar power in the UK, along with its intermittency and seasonal variation in output."	<p>required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar".</p> <p>It is the Applicant's view (and this aligns with Government's view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p> <p>The Applicant notes that the figure of 144,000 homes, as quoted by the respondent, was communicated during the pre-application phase to provide context to the capacity of the grid connections agreed between the Applicant and National Grid for the West Burton Solar Project. The Applicant notes that the actual number of homes powered by the Scheme will be determined by final technology, design, and household consumption. <b>7.11 Statement of Need [APP-320]</b> has been submitted as part of the application, setting out context, requirement and contribution of the Scheme to securing and decarbonising UK energy supply.</p>
7A-34	Principle of Development Energy Need	Alternatives and Design Evolution	"Given the untapped resource of solar on domestic rooftops (only 3% of domestic properties have solar panels in the UK) and commercial properties (which, alone could double the UK's current solar capacity), there is	Section 3.3 of <b>7.11 Statement of Need [APP-320]</b> describes Government's view that large capacities of low-carbon generation will be urgently required to meet increased demand and replace output from retiring (fossil fuel) plants, and that



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
	Alternatives and Design Evolution		no clear case for uncontrolled development of large scale, ground-mounted solar farms such as the West Burton Solar Project."	<p>"a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar".</p> <p>In April 2022, the British Energy Security Strategy set an aim for solar capacity in the UK to increase 5-fold from its current c.14GW to 70GW by 2035, subsequent government policy and strategy documents have provided further support to Government's aim.</p> <p>Section 7.6 <b>[APP-320]</b> analyses the potential contribution of "brownfield" solar sites to the national need for solar generation. Brownfield sites, including rooftop and other community energy systems, are likely to grow in the UK and will make a contribution to decarbonisation of the UK energy system.</p> <p>However, <b>7.11 Statement of Need [APP-320]</b> concludes that on their own, brownfield developments are unlikely to be able to meet the national need for solar. Section 8.5 of the Statement of Need describes and agrees with Government's view that decentralised and community energy systems are unlikely to lead to the significant replacement of large-scale infrastructure. It is the Applicant's view (and this aligns with Government's view) that large scale solar must be deployed to meet the urgent</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				national need for low-carbon electricity generation.
7A-35	Principle of Development Planning Policy Energy Need Climate Change	Scheme's Contribution to CO2 Policy	"Uncontrolled development of large-scale solar farms such as the West Burton Solar Project has the potential to limit the contribution of solar to carbon reduction policy. The incremental effect of "too much" solar, through uncontrolled development means that the incremental gain anticipated by the addition of each scheme will diminish, as each scheme contributes to provide power at the same time, beyond what is nationally required, thus diminishing the potential contribution to the CO2 policy objectives from each scheme."	<p>Section 3.3 of <b>7.11 Statement of Need [APP-320]</b> describes Government's view that large capacities of low-carbon generation will be urgently required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar".</p> <p>It is the Applicant's view (and this aligns with Government's view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p> <p>Figures 8.1 and 8.2 <b>[APP-320]</b> demonstrate, over longer time periods, how wind and solar are likely to complement each other in the provision, alongside other technologies, of a reliable electricity supply to UK consumers.</p>
7A-36	Principle of Development Energy Need	Suitability of Solar as a Source of Energy	"Solar provides power when demand is typically at its lowest in the UK, and along with the economics of supply and demand, this is when the prices are also typically at their lowest (at these times, already sometimes negative). The claimed economic benefit of solar on energy prices is, at best, therefore marginal."	<p>Section 3.3 of <b>7.11 Statement of Need [APP-320]</b> describes Government's view that large capacities of low-carbon generation will be urgently required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar".</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>It is the Applicant's view (and this aligns with Government's view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p> <p>Figure 7.5 [APP-320] shows that solar energy is produced during daylight hours and energy consumption is higher during daylight hours than overnight. . It is therefore not the case that solar produces power when demand is typically at its lowest in the UK.</p> <p>Figure 10.1 [APP-320] shows the UK's market pricing mechanism and commentary relating to that figure demonstrates that by increasing solar capacity (which has near zero marginal costs and zero marginal carbon emissions) expensive carbon emitting plant will be displaced from the grid. Further, because of the forecastable nature of solar energy, storage schemes connected to the National Electricity Transmission System will be incentivised to capture any generation which may be surplus to requirements and store it for later use, again bringing carbon and cost benefits to the UK's electricity system.</p> <p>Figures 8.1 and 8.2 [APP-320] demonstrate, over longer time periods, how wind and solar are likely to complement each other in the provision, alongside other technologies, of a reliable electricity supply to UK consumers.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
7A-37	Principle of Development Energy Need	The Scheme's Ability to Consistently Power Homes	"As a solution, for any electricity system, solar and batteries alone would be an uneconomic proposition, because there would need to be so much excess solar production capacity required to cater for intermittency, along with vast amounts of energy storage – which, together would render the concept unfeasible."	Paragraph 5.4.1 <b>7.11 Statement of Need [APP-320]</b> explains that the report does not seek to justify or promote the exclusion of any generation technologies other than solar power from the future GB generation mix, and the Applicant acknowledges that a mix of technologies is likely to deliver a low-carbon, secure and affordable UK energy supply.
7A-38	Principle of Development Energy Need	Nature of the Scheme and Direct Community Benefit	"The proposed West Burton Solar Project takes power generated at low voltages in parcels of land that surround villages, stepping up the voltage through transformers to connect directly to the National Grid at 400kV, rather than directly to local villages, hence, Island Green Power's claims to be able to "repower the region with clean, green energy" are misleading."	Whilst not a direct and targeted local energy supply benefit, there is benefit to all UK citizens – including local villages – from the UK producing more clean, renewable electricity, in terms of affordability and energy security and resilience. This is considered further in detail in Sections 7.4, 8.7, 8.8, 8.10, 10.2, 10.3 and 11.5 of <b>7.11 Statement of Need [APP-320]</b> .
7A-39	Principle of Development Energy Need	The Effective Use of Grid Connections	"Using this connection to the National Grid for WBSP would sterilise the use of a high voltage substation connection and preclude its use by future high-power applications."	Section 5.3 of <b>7.11 Statement of Need [APP-320]</b> sets out the urgent need for decarbonisation of the electricity sector, indeed Paragraph 8.9.3 explains that in 2021, BEIS (now DESNZ) unveiled plans to decarbonise UK power system by 2035.  The plans focus on building a secure, home-grown energy sector that reduces reliance on fossil fuels and exposure to volatile global wholesale energy prices and solar is part of that solution.  Section 8.4 <b>[APP-320]</b> describes the connection process of generators to the National Electricity

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>Transmission System (NETS) and Section 9.1 describes National Grid's processes to ensure that future needs are anticipated.</p> <p>The Applicant holds a Grid Connection Agreement and if in the future other schemes come forward to connect, their requirements will be assessed by National Grid at the time.</p>
7A-40	Alternatives and Design Evolution Energy Need	The Scheme's Need for a Grid Connection and Site Selection	"Because solar power is generated at low voltages, there are few restrictions to where it can be connected or located. That IGP have cited the connection to the National Grid at the West Burton substation as a starting point for the site location undermines the breadth of alternatives considered as part of the WBSP development."	<p>Section 3.3 of <b>7.11 Statement of Need [APP-320]</b> describes Government's view that large capacities of low-carbon generation will be urgently required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar".</p> <p>Section 8.5 <b>[APP-320]</b> describes and agrees with Government's view that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p> <p>Paragraphs 3.3.17-18 <b>[APP-320]</b> explain Government's view that irradiance, site topography and proximity to suitable connection points to the transmission network, are likely to be key inputs to site selection. Section 7.5 <b>[APP-320]</b> describes the site selection process for large scale solar more fully, and Section 7.7 sets out how the design of the Proposed Development seeks to maximise utilisation of the existing</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>available and contracted grid connection capacity available at the West Burton substation.</p> <p>Paragraph 7.6.8 <b>[APP-320]</b> describes Government's anticipated range of 2 to 4 acres for each MW of output generally required for a solar farm along with its associated infrastructure. The Scheme as proposed delivers a large-scale solar generation asset which is consistent with this range.</p>
7A-41	General Principle of Development	Grid Connection and the Construction Phase of the Scheme	<p>"Congestion in National Grid connection applications process means that the likely connection date for the West Burton Solar Project is November 2028. In the WBSP PIER document, the operation date is 2026. It is therefore not possible to complete and operate the project in the timescales indicated by IGP."</p>	<p>As is explained in paragraph 4.3.6 of <b>6.2.4 Environmental Statement - Chapter 4 Scheme Description [APP-042]</b>, the dates for construction given are the earliest possible dates that construction could commence for the purposes of the environmental impact assessments.</p> <p>Whilst the grid offer received for the Scheme is guaranteed for 2028, should the Scheme be consented, the Applicant will work with National Grid to confirm whether an earlier connection date is possible, and align construction timetables with this.</p>
7A-42	Alternatives and Design Evolution Soils and Agriculture	Site Selection and Agricultural Land Use	<p>"Given the low solar gain, the WBSP constitutes a grossly inefficient use of land – let alone productive arable land and undermines the credibility of the developer to claim that reasonable alternatives have been considered."</p>	<p>Section 3.3 of <b>7.11 Statement of Need [APP-320]</b> describes Government's view that large capacities of low-carbon generation will be urgently required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>predominantly of wind and solar". It is the Applicant's view (and this aligns with Government's view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p> <p>Section 7.6 [APP-320] demonstrates that large-scale solar is the most efficient use of land for energy generation purposes.</p>
7A-43	Other Environmental Matters (EMF)	Electromagnetic Fields	<p>"The developer, West Burton Solar Project, has not made adequate consideration of the impact of Electro Magnetic Fields (EMF) and no attempt has been made to reduce EMF's and their associated impact."</p>	<p>All items carrying an electrical current will induce electric and magnetic fields. The electromagnetic fields generated by the Scheme are not anticipated to pose any significant risk to human health, nor detrimental impact to nearby infrastructure. This was agreed by the Planning Inspectorate and local authorities as demonstrated by EMF impacts being scoped out of the Environment Impact Assessment.</p> <p>The International Commission on Non-Ionizing Radiation Protection (ICNIRP) set levels of 100µT for magnetic fields or 5kVm<sup>-1</sup> for electric fields as the reference levels for monitoring for long-term human health impacts (see section 21.2 of <b>6.2.21 Environmental Statement - Chapter 21 Other Environmental Matters [APP-059]</b>). The greatest source of EMF from the Scheme is from the substation, which has been located to ensure it is more than 400m from any residential property or location accessible to the public (see paragraph</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>21.2.9). The ICNIRP reference levels for magnetic fields may be exceeded along the shared cable route corridor, but only directly above the cables in transient spaces (roads, footpaths) to avoid impacts on residential or business properties. Therefore, no impact to human health from EMF is anticipated in these locations (paras. 21.2.7 to 21.2.9).</p>
7A-44	<p>Hydrology, Flood Risk and Drainage</p> <p>Soils and Agriculture</p>	Flood Risk and Soil Erosion	<p>"The potential for surface run-off and soil erosion from such a vast area of solar panels on this network does not appear to have been properly evaluated, particularly when considered in conjunction with other proposed schemes. Information available relating to flood management, drainage and soil erosion are therefore inadequate."</p>	<p>As stated in paragraph 10.8.19 and 10.8.20 of <b>6.2.10 Environmental Statement - Chapter 10 Hydrology Flood Risk and Drainage [APP-048]</b> maintaining the existing surface water run-off regime by utilising permeable surfacing for the Site access, linear infiltration trenches around any proposed infrastructure (substations and batteries) and wildflower planting at the leeward edge of solar panels will ensure that the Scheme is unlikely to generate surface water runoff rates beyond the baseline scenario.</p> <p>Section 4.0 Soil Management, Paragraph 5.3.11 and 5.3.12 of the <b>6.3.10.1 Environmental Statement - Appendix 10.1 Flood Risk Assessment and Drainage Strategy Report [APP-089]</b> assesses the potential impact of the Scheme on soils and soil erosion.</p> <p>In reverting arable land to permanent pasture for the duration of the solar farm, the risk of soil erosion is reduced. Soil is most vulnerable to</p>



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				erosion when exposed, as it is following annual cultivation for arable cropping. Year round plant cover also promotes more rapid infiltration of rainfall and slowing of any overland flow.
7A-45	Ecology and Biodiversity  Soils and Agriculture	The Scheme's Impact upon Soil Quality and Biodiversity Net Gain	"Island Green Power claim there will be a 10% biodiversity net gain from the West Burton Solar Project, but have failed to explain how this would be achieved, nor is it clear what methodology or assumptions lie behind the assertion."	The grassland beneath panelled land and the field margins will receive low-intensity management and be seeded to create a habitat of significantly increased species diversity than existing. This is secured through Requirement 9 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> , which states that "No part of the authorised development may commence until a biodiversity net gain strategy has been submitted to and approved by the relevant planning authority, in consultation with the relevant statutory nature conservation body." In this way, a substantive net gain for biodiversity will be achieved (see <b>6.3.9.12 Environmental Statement - Appendix 9.12 Biodiversity Net Gain Report [APP-088]</b> ), predominantly through the creation of extensive low-input grassland resulting in a net gain of 86.8% in habitat units, but also several new ponds and wetland habitat parcels resulting in a net gain of 33.25% in river units, and the planting of several kilometres of species-rich hedgerow resulting in a net gain of 54.71% in hedgerow units. This assessment has been carried out following the methodology,

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>guidance and principles set out within the Defra Biodiversity Metric version 3.1. The Biodiversity Net Gain Report [APP-088] sets out all assumptions made in undertaking this assessment.</p> <p>The habitat enhancement proposals are set out within <b>7.3_A Outline Landscape and Ecological Management Plan Revision A [EN010132/EX1/WB7.3_A]</b> which outlines appropriate management measures to ensure the maximum benefit for biodiversity is realised during the operational phase of the scheme. The oLEMP also sets out the outline monitoring methods for the site. Monitoring of the habitats created and enhanced through the scheme is essential to ensure their successful establishment and ongoing success. This is secured through Requirement 7 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p>
7A-46	Principle of Development	Associated Development Nature of the BESS	"Island Green Power provide very little detail on the storage facility included in the proposed development. Operating in a separate segment of the electricity market, it is unclear therefore whether the proposed energy storage system can truly be considered to be associated development for the proposed solar farm."	" <i>Planning Act 2008: Guidance on associated development applications for major infrastructure projects</i> " (Department for Communities and Local Government, April 2013, "GADA") provides guidance on what can properly be regarded as 'Associated Development' for Nationally Significant Infrastructure Projects (NSIPs). GADA sets out five principles which the Secretary of

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>State will take into account in making a decision on a proposed project.</p> <p>The Works Nos. which are noted as 'Associated Development' are explained within paragraphs 3.1.4 to 3.1.8 of <b>3.2 Draft Explanatory Memorandum [APP-018]</b>. The Applicant's position is that the BESS is 'Associated Development' because:</p> <ol style="list-style-type: none"> <li>1. There is a direct relationship between the associated (BESS) development and the principal (solar) development, because the BESS supports the operation of the solar panels;</li> <li>2. The BESS is not an aim in itself and is subordinate to the solar;</li> <li>3. The BESS is not being developed only to cross-subsidise the cost of the solar development;</li> <li>4. The proposed BESS is proportionate to the principal development; and</li> </ol> <p>The Applicant proposes to bring the BESS forwards alongside the solar as part of the integrated Scheme.</p>
7A-47	Air Quality Hydrology, Flood Risk and Drainage	Safety and Fire Risks Posed by the BESS	"The safety and environmental concerns arising from battery development at this scale have not been appropriately considered, including through operation and transportation. Large scale battery installations have begun to be developed in recent years but have been susceptible to failures	As stated in paragraph 3.10.4 of <b>6.3.10.5 Environmental Statement - Appendix 10.5 FRA DS West Burton 3 [APP-093]</b> , in order to isolate the Site's drainage, a sandfield valve should be installed at the outfall to the land drain. In the

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
	Other Environmental Matters (Major Accidents and Disasters / Human Health)		involving fires and the emission of toxic and flammable fumes. Resulting in environmental damage from toxic run-off."	<p>event of a fire, the valve can be activated to close off the battery storage area's drainage system..</p> <p>Paragraph 3.10.5 [APP-093] goes on to state that after a fire event, the wastewater will be tested to ascertain the level of contamination. A decision will then be made as to the appropriate methodology to dispose of the attenuated water. This may involve on-site treatment and release or tankering.</p> <p>The Applicant has submitted <b>7.9 Outline Battery Storage Safety Management Plan [APP-318]</b> and, through <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>, has secured by Requirement 6 of Schedule 2 that "Work No. 2 must not commence until a battery storage safety management plan has been submitted to and approved by the relevant planning authority."</p> <p>Paragraph 4.1.18 of <b>7.9 Outline Battery Storage Safety Management Plan [APP-318]</b> explains that the design of the BESS has integrated fire detection and suppression systems that will automatically operate to contain battery fires. Paragraph 5.3 states that if fire spreads to multiple units, external firefighting water facilities are available by means of 228,000 litre water storage tanks within the battery compounds.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>Human health and other environmental impacts resulting from plumes from potential battery fires have been initially assessed in <b>6.2.17 Environmental Statement - Chapter 17 Air Quality [APP-055]</b> and are proposed to be supplemented by additional information during the examination process.</p> <p>As stated in paragraphs 3.10.1 to 3.10.5 of <b>6.3.10.5 Environmental Statement - Appendix 10.5 FRA DS West Burton 3 [APP-093]</b>, fire water provision in line with Lincolnshire Fire and Rescue requirements has been accommodated within the Scheme.</p>
7A-48	Glint and Glare	The Scheme's Glint and Glare impact on Receptors.	"The impact of glint and glare on aviation (e.g. RAF, airfields, gliding clubs), or other outdoor activities (e.g. horse riding, hunts) has not been thoroughly considered, as well as visibility from prominent roads."	<p><b>6.2.16 Environmental Statement - Chapter 16 Glint and Glare [APP-054]</b> has considered the impact upon aviation operations and infrastructure associated with the nearby airfields in sections 3.1 to 3.3 of <b>6.3.16.1 Environmental Statement - Appendix 16.1 Solar Photovoltaic Glint and Glare Study [APP-132]</b>. It concludes in paragraph 16.8.3 of <b>6.2.16 Environmental Statement - Chapter 16 Glint and Glare [APP-054]</b> that "Minor/Negligible Adverse effects are predicted in respect of aviation receptors."</p> <p>The findings of the report were shared with the major airfields to seek their opinion on the impact of the Scheme. All airfields' safeguarding teams have agreed with the conclusion of the</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>report as noted in Table 16.1 of <b>6.2.16 Environmental Statement - Chapter 16 [APP-054]</b>.</p> <p>More generally, the assessment considers glint and glare effects upon receptors such as Public Rights of Way, dwellings, roads, railway infrastructure as well as aviation receptors (see the executive summary contained within <b>6.3.16.1 Environmental Statement - Appendix 16.1 Solar Photovoltaic Glint and Glare Study [APP-132]</b>).</p> <p>Where glint and glare effects are predicted to be of "Moderate" or higher impact (see paragraph 16.8.2 of <b>6.2.16 Environmental Statement - Chapter 16 [APP-054]</b>) embedded mitigation has been implemented as part of the landscape and ecological mitigation strategy, shown at <b>6.4.8.18.1 to 6.4.8.18.3 Landscape and Ecology Mitigation and Enhancement Plans (Figures 8.18.1 to 8.18.3) [WB6.4.8.18.1_A to WB6.4.8.18.3_A]</b>.</p>
7A-49	Noise and Vibration	Noise impacts of the Scheme	"It is unclear from the information provided by Island Green Power what noise pollution will arise from the proposed West Burton Solar Development, either from electrical equipment (e.g. battery and inverter fans), or from wind noise / resonance from the configuration of large panel structures."	The likely impacts of noise and vibration, including any anticipated impacts to residential properties, have been assessed in Section 15.7 of <b>6.2.15 Environmental Statement - Chapter 15 Noise and Vibration [APP-053]</b> . The noise and vibration effects are not anticipated to be significant.

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
7A-50	Waste	Scheme Decommissioning and Recycling	<p>"The West Burton Solar Project documentation provides little detail on the arrangements for decommissioning and recycling, nor the standards to which the developer would be held to at the end of the life of the project. That Island Green Power does not have experience of development at this scale, there is no guarantee the region is not left with the legacy of a disused solar farm liability at the end of the project's lifetime."</p>	<p>The likely impacts on waste and recycling are set out in Section 20.7 of <b>6.2.20 Environmental Statement - Chapter 20 Waste [APP-058]</b>. Subject to the mitigation measures set out in paragraphs 20.8.1 to 20.8.3, there are no significant effects anticipated from the decommissioning of the Scheme on local waste handling facilities.</p> <p><b>7.2 Outline Decommissioning Statement [APP-310]</b> sets out the principles of decommissioning and environmental considerations (see paras. 2.1.1 to 2.1.9) and provides a summary of potential mitigation and management measures during decommissioning through Table 3.1. It also sets out how roles, responsibilities and actions required in respect of implementation of the mitigation measures will be managed, along with principles for monitoring and reporting. By example and as contained within Table 3.1, provision is made that <i>"Infrastructure such as PV panels and battery storage units will be removed and recycled as far as practical and in accordance with legislation and guidance applicable at the time"</i>.</p> <p>Further details will be provided in the final decommissioning plan submitted for approval prior to decommissioning. The commitment for the final decommissioning plan to be substantially in accordance with the Outline</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				Decommissioning Statement is secured by Requirement 21 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> .
7A-51	General	Decommissioning of the Scheme	"It is evident from Financial Returns that neither West Burton Solar Project Limited nor its parent company Island Green Power have direct capital to support the estimated £800+ Million pounds to develop the project or deal with the decommissioning of the West Burton Solar Project. It is widely expected therefore that if approved the Project will be sold or further investment found. It will be important that the decommissioning is secured and be completed with the land being returned to its previous state. With this in mind it is strongly recommended that if the application is approved, it is conditional on the incumbent landowners ultimately being made responsible for the identified decommissioning as a backstop against unforeseen circumstances, e.g. financial default by the developer or its successor companies."	<p>The Applicant confirms that the following is secured through Requirement 21 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>: "Within 12 months of the date that the undertaker decides to decommission any part of the authorised development, the undertaker must submit to the relevant planning authority for that part a decommissioning plan for approval" and that "The decommissioning plan must be substantially in accordance with the outline decommissioning statement."</p> <p>The Applicant acknowledges that non-compliance with the terms of the Order, inclusive of non-compliance with any management plans secured through requirement, is a criminal offence, under section 161 of the Planning Act 2008.</p>
7A-52	General (Skills and Supply Chain) Principle of Development	Sustainable Sourcing of Raw Materials for the Scheme	"The U.S. government has identified forced labour in China as an area of concern for the solar supply chain. Furthermore, the process of extracting the raw materials for batteries requires large amounts of energy and water, often in mines where workers face unsafe conditions. Any materials sourced by IGP for the West Burton	Paragraph 7.3.1 and 7.3.2 of <b>7.10 Outline Skills Supply Chain and Employment Plan [APP-319]</b> sets out information on the safeguarding measures taken to prevent human rights abuses in the supply chain for the Scheme.



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			Solar Project should be truly sustainable, e.g. free of forced labour, where workers' safety is paramount, and where the full environmental implications are understood."	<p>Paragraph 5.4.7 of the <b>Outline Plan [APP-319]</b> states that <i>"Any procurement of supplies internationally will comply with both national and international law, and all policy and safety measures will be adhered to in the transportation of supplies."</i></p> <p>The Applicant confirms that production of a Skills, Supply Chain and Employment Plan is secured by Requirement 20 of Schedule 2 to <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>. This requirement states that "No part of the authorised development may commence until a skills, supply chain and employment plan in relation to that part has been submitted to and approved by the relevant planning authority for that part or, where the part falls within the administrative areas of multiple planning authorities, each of the relevant planning authorities."</p>

**Table 2.3.2: Applicant's Response to Anglian Water Services Limited [RR-018]**

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
AWSL-01	The Interested Party	Context of AWSL's Representation	"Anglian Water Services Limited (Anglian Water) is the statutory undertaker for water and sewerage services in the application area. Jacobs U.K.	The Applicant notes this comment.

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			Limited is supporting Anglian Water as an Interested Party in this examination."	
AWSL-02	Principle of Development (DCO)	Draft DCO	"Anglian Water are in contact with the Applicant regarding the protective provisions in Schedule 16 (For the Protection of Anglian Water Services Limited) Part 7 of the Draft Development Consent Order (DCO) as some provisions differ from Anglian Water's protective provisions template that was previously shared with the Applicant."	Draft protective provisions are included in Part 7 to Schedule 16 of the <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> . The Applicant notes this comment and is confident that the form of protective provisions can be agreed with Anglian Water prior to the end of the Examination, which will ensure that Anglian Water's statutory undertaking is not subject to serious detriment as a result of the Scheme.
AWSL-03	Hydrology, Flood Risk and Drainage  Other Environmental Matters (Telecomms & Utilities)	Anglian Water Assets	"Any impacted Anglian Water assets need to be identified and either diverted or protected."	The requirement for on-site surveys to ground-truth the location of utilities is set out in paragraphs 21.3.4 and 21.3.5 of <b>6.2.21 Environmental Statement - Chapter 21 Other Environmental Matters [APP-059]</b> and secured through <b>7.1_A Outline Construction Environmental Management Plan Revision A [EN010132/EX1/WB7.1_A]</b> . The Applicant is committed to consultation and agreement with operators and/or owners of utility infrastructure that is likely to be directly impacted by the location or design of the Scheme.  The Outline Construction Environmental Management Plan is secured in the <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> which provides (in

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>Requirement 13 of Schedule 2) that "No part of the authorised development may commence until a construction environmental management plan for that part has been submitted to and approved by the relevant planning authority or, where the part falls within the administrative areas of multiple relevant planning authorities, each of the relevant planning authorities". It further provides that "The construction environmental management plan must be substantially in accordance with the outline construction environmental management plan."</p> <p>The protective provisions included in Part 7 to Schedule 16 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> will also protect Anglian Water's apparatus where it interfaces with the Scheme.</p>
AWSL-04	Principle of Development Hydrology, Flood Risk and Drainage Waste Other Environmental Matters	Connection to Anglian Water Services	<p>"It is noted that no connections to Anglian Water's services for potable water, and surface water and foul water are proposed for the development. The Applicant should be aware that in the event a potable water connection be required or an increase in supply sought from Anglian Water, possibly in part to replace water supplies through sustainable abstraction reductions at private abstraction sites, that such supplies may not be available from Anglian Water. This position</p>	<p>The DCO would also allow water supply connections to be made during all stages. However, only a temporary mains water supply is anticipated to be necessary during construction and decommissioning as set out in <b>7.1_A Outline Construction Environmental Management Plan Revision A [EN010132/EX1/WB7.1_A]</b> (oCEMP) which specifies washing down of vehicles on page 23, dust suppression water spraying on page 37, and ensuring an adequate water supply on site for effective dust</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
	(Telecomms & Utilities)		changed in early 2023 with further work on the draft Water Resources Management Plan."	<p>suppression on page 42. The oCEMP notes that non potable water will be used where possible and appropriate on page 37.</p> <p>For any surface and foul water drainage, it is secured by way of Requirement 11 of Schedule 2 in <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> that Anglian Water must be consulted prior to the approval of any such drainage scheme.</p> <p>Foul water generated during construction, operation, and decommissioning is to be held on site and removed by tanker to an approved wastewater and sewage treatment centre (see paras. 20.7.6, 20.7.15, and 20.7.26 of <b>6.2.20 Environmental Statement - Chapter 20 Waste [APP-058]</b>). This is secured through both <b>7.1_A Outline Construction Environmental Management Plan Revision A [EN010132/EX1/WB7.1_A]</b> and <b>7.14_A Outline Operational Environmental Management Plan Revision A [EN010132/EX1/WB7.14_A]</b>, themselves secured by Requirements 13 and 14 respectively of Schedule 2 in <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
AWSL-05	General (Procedural)	Statement of Common Ground (SoCG)	"If necessary, Anglian Water will also seek and agree a Statement of Common Ground with the Applicant, for example, if protective provisions are not agreed before Deadline 1 and so are a live matter for the Examining Authority."	In response to additional correspondence between the Applicant and Anglian Water Services Limited regarding protective provisions, dated 6 <sup>th</sup> , 17 <sup>th</sup> and 27 <sup>th</sup> July 2023, the Applicant has agreed to enter into a Statement of Common Ground with Anglian Water Services Limited <b>[EN010132/EX1/WB8.3.12]</b> . This is currently subject to negotiation between the parties.

**Table 2.3.3: Applicant's Response to Cadent Gas Limited [RR-032]**

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
CGL-01	The Interested Party	Existing Infrastructure and Easements	"Cadent wishes to make a relevant representation to the West Burton Solar Project DCO in order to protect its position in light of infrastructure which is within or in close proximity to the proposed DCO boundary. Cadent's rights to retain its apparatus in situ and rights of access to inspect, maintain, renew and repair such apparatus located within or in close proximity to the order limits including should be maintained at all times and access to inspect such apparatus must not be restricted."	The Applicant notes this comment.
CGL-02	Principle of Development (DCO)	Impacts on Existing Infrastructure and Easements	"The documentation and plans submitted for the above proposed scheme have been reviewed in relation to impacts on Cadent's existing apparatus located within this area, and Cadent has identified that it will require adequate	The Applicant is negotiating protective provisions with Cadent to ensure that its statutory undertaking is not subject to serious detriment as a result of the Scheme. Draft protective provisions are included in Part 6 to Schedule 16

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
	Other Environmental Matters (Telecoms & Utilities)		protective provisions to be included within the DCO to ensure that its apparatus and land interests are adequately protected and to include compliance with relevant safety standards."	<p>of the <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>, and these include provisions relating to retained apparatus. The Applicant is confident that agreement can be reached with Cadent prior to the close of the Examination.</p> <p>The location of underground infrastructure has been identified and preliminary offsets as required by easements and operator safety distances have been embedded in the Scheme design, as set out in Table 21.6.2 of <b>6.2.21 Environmental Statement - Chapter 21 Other Environmental Matters [APP-059]</b>, and in Section 5.4 and 5.5 of <b>7.6 Design and Access Statement [APP-314]</b>. Furthermore, the requirement for on-site surveys to ground-truth the location of utilities is set out in paragraphs 21.3.4 and 21.3.5 of <b>6.2.21 Environmental Statement - Chapter 21 Other Environmental Matters [APP-059]</b>, and secured through <b>7.1_A Outline Construction Environmental Management Plan Revision A [EN010132/EX1/WB7.1_A]</b>. The Applicant is committed to consultation and agreement with operators and/or owners of utility infrastructure that is likely to be directly impacted by the location or design of the Scheme.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
CGL-03	Principle of Development (DCO)	Provision for Potential Diversions	"Cadent has medium pressure gas pipelines located within the order limits which are affected by works proposed, the extent to which is still being assessed and which may require diversions subject to the impact. Proposed diversions have not yet reached detailed design stage and so the positioning, land rights and consents required for these gas diversions are not confirmed. At this stage, Cadent is not satisfied that the DCO includes all land and rights required to accommodate such diversions as design studies will need to influence these requirements."	<p>The Applicant notes this comment, and is committed to consultation and agreement with operators and/or owners of utility infrastructure that is likely to be directly impacted by the location or design of the Scheme.</p> <p>As noted in CGL-02 above, draft protective provisions are included in Part 6 to Schedule 16 of the <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>, and these include provisions relating to diverting apparatus and constructing alternative apparatus if necessary as a result of the Scheme.</p>
CGL-04	Principle of Development (DCO)  Other Environmental Matters (Human Health / Major Accidents and Disasters / Telecoms & Utilities)	Decommissioning of Existing Apparatus	"Cadent will not decommission its existing apparatus and/or commission new apparatus until it has sufficient land and rights in land (to its satisfaction) to do so, whether pursuant to the DCO or otherwise. This is a fundamental matter of health and safety."	<p>The Applicant notes this comment, and is committed to consultation and agreement with operators and/or owners of utility infrastructure that is likely to be directly impacted by the location or design of the Scheme.</p> <p>As noted in CGL-02 above, draft protective provisions are included in Part 6 to Schedule 16 of the <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>. These include provisions for the undertaker to afford to Cadent the necessary facilities and rights to construct, maintain and allow access to alternative apparatus in the event that the</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>Scheme requires the removal of Cadent's existing apparatus. The location of underground infrastructure has been identified and preliminary offsets as required by easements and operator safety distances have been embedded in the Scheme design, as set out in Table 21.6.2 of <b>6.2.21 Environmental Statement - Chapter 21 Other Environmental Matters [APP-059]</b>, and in Section 5.4 and 5.5 of <b>7.6 Design and Access Statement [APP-314]</b>. Furthermore, the requirement for on-site surveys to ground-truth the location of utilities is set out in paragraphs 21.3.4 and 21.3.5 of <b>6.2.21 Environmental Statement - Chapter 21 Other Environmental Matters [APP-059]</b>, and secured through <b>7.1_A Outline Construction Environmental Management Plan Revision A [EN010132/EX1/WB7.1_A]</b>.</p>
CGL-05	<p>Principle of Development (DCO)</p> <p>Planning Policy</p>	Legislative Context	"At this stage, Cadent is not satisfied that the tests under section 127 of the PA 2008 can be met."	<p>As noted in CGL-02 above, draft protective provisions are included in Part 6 to Schedule 16 of the <b>C3.1_A Draft Development Consent Order Revision A [AS-012]</b>, and these (among other things) require the Applicant to obtain Cadent's consent prior to carrying out any works thereby ensuring there is no serious detriment to Cadent's undertaking.</p>



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
CGL-06	Principle of Development (DCO)	Draft DCO: Protective Provisions	"Cadent has experience of promoters securing insufficient rights in land within DCOs for necessary diversions of its apparatus or securing rights for the benefit of incorrect entities. It is important that sufficient rights are granted to Cadent to allow Cadent to maintain its gas distribution network in accordance with its statutory obligations."	As noted in CGL-04 above, draft protective provisions are included in Part 6 to Schedule 16 of the <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> . These include provisions for the undertaker to afford to Cadent the necessary facilities and rights to construct, maintain and allow access to alternative apparatus in the event that the Scheme requires the removal of Cadent's existing apparatus, as well as other provisions that will ensure there is no serious detriment to Cadent's undertaking .
CGL-07	Principle of Development (DCO)  General	Draft DCO: Protective Provisions  Engagement with Applicant	"As a responsible statutory undertaker, Cadent's primary concern is to meet its statutory obligations and ensure that any development does not impact in any adverse way upon those statutory obligations. Adequate protective provisions for the protection of Cadent's statutory undertaking have not yet been agreed but are in discussion between parties. Cadent wishes to reserve the right to make further representations as part of the examination process but will seek to engage with the promoter to reach a satisfactory agreement."	The Applicant notes this comment and refers Cadent to the responses provided in the rows above.

**Table 2.3.4: Applicant's Response to Canal & River Trust [RR-033]**

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
CRT-01	The Interested Party	Registering Interest in the Application	"The Canal & River Trust ("the Trust") has previously provided comments to the applicant on the route options for the cable connection and now wished to register and comment as an interested party for the examination relating to the above Application."	The Applicant acknowledges that CRT has previously provided comments to the Applicant and notes this comment.
CRT-02	The Interested Party	The CRT's Role and Responsibilities	<p>"The Trust is a statutory party for the purposes of s.88(3) of the Planning Act 2008 ("the 2008 Act") as the Application is likely to have an impact on the River Trent, or land adjacent to the river, which is an inland waterway in England. The Trust is a statutory undertaker for the purposes of s.127 of the 2008 Act. The Trust is navigation authority for the River Trent and has a duty to maintain the river between Meadow Lane Lock, Nottingham and Gainsborough Bridge as a commercial waterway under s.105 of the Transport Act 1968 and is lessee of the foreshore and riverbed under a lease from The Crown Estate dated 16 February 2011 and registered at the Land Registry under title number NT473004. The Trust is freehold owner of land to the west of the River Trent registered at the Land Registry under title number NT239763 which is used operationally as a dredging tip.</p> <p>The Trust also has environmental and recreational duties under s.22 British Waterways Act 1995 when considering proposals relating to its functions. These include consideration of</p>	The Applicant notes this comment and the CRT's duties as a statutory undertaker.

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			effects on flora and fauna and preserving access to towing paths for the public. The Trust's charitable objects include, for the public benefit, the preservation, protection, operation and management of inland waterways for navigation and conservation, protection and improvement of the natural environment and landscape of inland waterways."	
CRT-03	Site Description Socio-economics, Tourism and Recreation	Location of Development	"The proposed route of the cable connection for the Project would have one interface/crossing (underground) with the River Trent, just south of Trent Port, Marton. The River Trent in this location is a tidal commercial waterway used by both large commercial vessels and for leisure purposes. As navigation authority, the Trust is responsible for navigational safety for this part of the river. The Trust is also the owner and operator of the dredging tips for the deposition of river dredgings to maintain the navigational safety of the River Trent. The southern bund and edge of the western dredging tip is located within Works Package 5A. This is a rural stretch of river with a mixture of open fields and mature hedgerows within the managed river flood plain. The river corridor is well used for leisure and recreation and the west riverbank carries the long-distance Trent Valley Way path."	The Applicant notes the CRT's role as the navigation authority for the River Trent.  Paragraph 4.5.44 of <b>6.2.4 Environmental Statement - Chapter 4 Scheme Description [APP-042]</b> details the design parameters for Horizontal Directional Drill (HDD) across the River Trent in relation to the laying of the Cable Route Corridor.  The Applicant is cognisant of the significance of the countryside for physical and mental wellbeing and as such, likely impacts on the desirability and use of recreational facilities in the countryside, such as public rights of way, have been assessed in Section 18.7 of <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b> . The likely anticipated impacts on the recreational use of the River Trent during construction are short-term minor adverse (para. 18.7.64) and during

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>operation are long-term minor adverse (para. 18.7.111).</p> <p>The greatest effect to the Trent Valley Way is anticipated to be a short- to medium-term temporary moderate adverse during construction (see Table 18.15 and para. 18.7.62). This effect is therefore <b>significant adverse</b>. The Trent Valley Path is not however anticipated to experience any significant long-term effects during Scheme operation (para. 18.7.109), or during the Scheme's decommissioning (Table 18.29).</p> <p>Protective provisions have been agreed with the CRT as part of a wider discussion to ensure consistency across the Scheme, Cottam Solar Project and Gate Burton Energy Park. Agreement has now been reached between the Canal and River Trust and the Applicant on the minimum depth of drilling under the River Trent to be 5m below the river bed on the Cottam Solar Project. This agreement will then be replicated on West Burton and this will be secured through updated protective provisions in the next version of the draft DCO.</p> <p>There are further ongoing discussions with the Canal and River Trust in order to agree bespoke protective provisions just for this Scheme relating to a dredging tip located along the proposed cable route.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
CRT-04	Principle of Development  General (Procedural)	Shared Cable Route Corridor  Cumulative Development	"We note that in the Application document WB6.2.2 (ES Chapter 2 EIA Process and Methodology), paragraph 2.5.12, the applicant states that they are working on Package 5A and 5B) with Gate Burton Energy Park (EN010131, accepted for examination on 22 February) and Cottam Solar Project (EN010133, application submitted on 12 January). The Trust is also aware of the Tillbridge Solar Farm (EN010142) which is at an early stage (application due Q4 2023) but is proposing a cable crossing at a similar location on the river. We welcome a joint working approach with all these schemes to ensure efficiency in the consenting process and to limit the potential for short and long term economic, environmental and social impacts on the navigation and its users. Ideally the proposals for the crossing of the River Trent should minimise the timescale of construction impacts on the locality as would be achieved through Cumulative Scenario 1 in paragraph 2.5.14 of Application document WB6.2.2 (ES Chapter 2 EIA Process and Methodology)."	To minimise impacts, the Cottam Solar Project, Gate Burton Energy Park and West Burton Solar Project have proposed a shared cable corridor route, and are progressing collaborative work on this matter. Paragraph 4.3.8 of <b>6.2.4 Environmental Statement - Chapter 4 Scheme Description [APP-042]</b> sets out the Applicant's commitments and the proposed commitments of the promoters of the other local schemes to joint mitigation.
CRT-05	The Representation	Contents of the CRT's Representation	"The representations made here are without prejudice to any further or amended representations which the Trust may make following a comprehensive review of the Application as part of the examination process. In	The Applicant notes this comment and will address the representation points in turn below.

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>this letter, the Trust makes representations on the following:</p> <ul style="list-style-type: none"> <li>• The draft Development Consent Order (DCO) and Protective Provisions for the Trust;</li> <li>• The Trust's Third-Party Works Code of Practice;</li> <li>• Discharge of water into, and prevention of siltation etc. of, the river Noise &amp; Vibration;</li> <li>• Ecology &amp; Biodiversity in the river;</li> <li>• Lighting during construction;</li> <li>• Landscape and Visual Impact; and</li> <li>• Use of River Trent for Works Traffic."</li> </ul>	
CRT-06	Principle of Development (DCO)	Draft DCO and Protective Provisions for CRT.	<p>"There are a number of provisions within the draft DCO which would impact the Trust as navigation authority for the River Trent. The draft DCO was not shared with the Trust as part of a pre-application consultation. On first review, we have concerns with article 16 (discharge of water); article 19 (authority to survey and investigate land); article 20 (compulsory acquisition of land); article 22 (compulsory acquisition of rights), article 25 (acquisition of subsoil); article 30 (temporary use of land); article 31 (statutory undertakers). We have not ascertained whether</p>	<p>The Applicant notes that, in compliance with Section 42 of the Planning Act 2008, the Canal and Rivers Trust were contacted on 15 June 2022 and provided a link to a copy of the PEIR for consultation.</p> <p>The Applicant's undertaking of statutory consultation under Section 42 of the Planning Act is described in Chapter 9 of <b>5.1 Consultation Report [APP-022]</b>.</p> <p>A response from the Trust was received on 25 July 2022 and considered by the Applicant (see <b>5.13</b></p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>the disapplication of legislation proposed by article 6 and schedule 3 impacts the Trust and have asked the applicant for a summary of the provisions which would be disappplied.</p> <p>The draft DCO does not contain any specific protective provisions for the Trust. The Trust notes that other statutory undertakers have been afforded protective provisions within schedule 16. Following the acceptance of the Application for examination, the applicant has indicated in writing separately to the Trust that they would be willing to include protective provisions for the Trust and have invited the Trust to provide draft provisions.</p> <p>To aid the examination we have provided the applicant with a set of protective provisions which would resolve and satisfy our principal concerns. The protective provisions have been adapted from the Keadby 3 (Carbon Capture Equipped Gas Fired Generating Station) Order 2022 (made 7 December 2022). A copy of these are appended to this letter. The Trust reserves the ability to add to and amend the draft protective provisions as part of the examination process."</p>	<p><b>Consultation Report - Appendix 5.13 - Section 42 Applicant Response [APP-037]).</b></p> <p>The Applicant did not share a draft DCO with consultees during the Pre-Application stage but has engaged with the Trust on the drafting of protective provisions since the DCO application was accepted.</p> <p>In a letter dated 1 September 2023, the CRT confirmed that the wording of the protective provisions agreed and submitted to Gate Burton examination was agreed across all four solar schemes in the local area, including this Scheme. The letter stated that "<i>The Trust will be working on the basis that this wording is agreed for all projects subject to there being no changes to the proposed projects, from what we understand them to be at this point in time, which could impact the Trust's operations.</i>"</p> <p>It also noted that "[CRT] expect additional wording will need to be agreed for the West Burton project due to the proposed route under the dredging tip." This is currently being negotiated between the parties. The current draft protective provisions will be added to the draft DCO.</p>
CRT-07	Principle of Development	The Trust's Code of Practice and	"As with other nationally significant infrastructure projects (NSIPs) that include works that interface with the Trust's network, any parts of the Project with the potential to affect the River Trent should	The Applicant notes CRT's comments relating to inclusion of protective provisions for the benefit

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
		Protective Provisions.	<p>be carried out in accordance with the Canal &amp; River Trust Third-Party Works Code of Practice (CoP). DCOs for these NSIPs have included an express obligation obliging the applicant to have regard to the CoP in the detailed survey. Design, construction, and approval of the relevant works. The protective provisions enclosed with this representation contain appropriate wording.</p> <p>The Trust's CoP is designed to safeguard all users of the navigation and to deal with the nuances of developing adjacent to a commercial waterway with an ever-changing tidal riverbed. The extent of potential impacts from development adjacent to, or under, navigational waters could reach far beyond the crossing point proposed. Ensuring that development is appropriately located and controlled on land adjacent to the Trust's network is crucial to limit the potential for risk to users of the river and the associated economic, environmental and social consequences.</p> <p>Through the CoP, developers engage with the Trust's engineers who are specialists in navigational safety the protection and safeguarding of the riverbed and the ecology of the waterway. It is essential that the proposals incorporate appropriate measures to protect the users of the river before, during and after construction for all temporary and permanent works affecting the waterway including surveying</p>	<p>of CRT in the DCO and refers CRT to the response to CRT-06 above.</p> <p>From an ecological perspective, the works to be undertaken to install subterranean cables beneath the River Trent will comply with the CRT's Code of Practice through prescriptions that are to be updated within <b>7.17 Outline Ecological Protection and Mitigation Strategy (EMPS) [APP-326]</b>.</p> <p>Specifically, in line with Section 7 of the CRT's Code of Practice for Works Affecting the Canal and River Trust Part 1, measures are provided to minimise the potential for impacts on protected species such as otters and water voles, breeding birds and fish and amphibians, principally through the pre-works inspection and during-works supervision by an ecologist following specific protocols.</p> <p>As recommended in Section 2 of the CRT's Code of Practice for Works Affecting the Canal and River Trust Part 2, trenchless techniques are to be used via Horizontal Directional Drilling, which will drastically minimise the potential for physical damage to the waterway (see paragraph 7.2.3 <b>[APP-326]</b>).</p> <p>The Outline Strategy is secured through Requirement 8 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A</b></p>



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>and sampling within the waterway. Engaging with the Trust's engineers ensures the appropriate measures are taken.</p> <p>The protective provisions and use of the CoP will deal with all of the Trust's concerns relating to:</p> <ul style="list-style-type: none"> <li>• Horizontal Directional Drilling and surveys;</li> <li>• Discharge of water into, and prevention of siltation etc. of, the river;</li> <li>• Noise &amp; Vibration;</li> <li>• Ecology &amp; Biodiversity in the river;</li> <li>• Lighting during construction;</li> <li>• Landscape &amp; Visual Impact; and</li> <li>• Use of River Trent for Works Traffic."</li> </ul>	<p><b>[EN010132/EX1/WB3.1_A]</b>, which provides that "No part of the authorised development may commence until a written ecological protection and mitigation strategy has been submitted to and approved by the relevant planning authority for that part or, where the phase falls within the administrative areas of multiple relevant planning authorities, each of the relevant planning authorities."</p> <p>The Applicant therefore confirms that the detailed EPMS will ensure that the Scheme is constructed in compliance with the Canal &amp; River Trust's Third-Party Works Code of Practice (CoP).</p>
CRT-08	<p>Principle of Development</p> <p>Ecology and Biodiversity</p> <p>Ground Conditions and Contamination</p> <p>Transport and Access</p>	Works Packages 5A and 5B	<p>In terms of Works packages 5A and 5B, relating to the cable crossing of the River Trent, we welcome that this would be undertaken via trenchless techniques with the Crossing Schedule confirming that the crossing beneath the River Trent is proposed by Horizontal Directional Drilling (HDD). Unfortunately, Sheet 7 of the Crossing Schedule plans does not appear to be available at this time on the PINS website, with only Sheets 1 to 4 of 10 showing at the end of the Crossing Schedule document. Sheet 7 would show the referenced details of the River Trent</p>	<p>The Applicant is aware of the omission of Sheets 5-10 of the Crossing Schedule. As such, the Applicant has submitted <b>WB7.15_A Crossing Schedule Revision A [AS-001]</b> alongside submissions in response to Section 51 advice <b>[PD-003]</b> on 3<sup>rd</sup> August 2023. The Applicant therefore invites the Canal and River Trust to review the amended documents and provide updated comments in respect of the information now provided.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
	Noise and Vibration		<p>crossing and the proximity of the cable route to the hedgerow (H146 on the Important Hedgerows Plan, Application document WB2.9) along the southern boundary of the dredging tip site and its L shape bund to the north side of this hedgerow which lie within Works package 5A. This L shape bund intersects with the EA flood bank at the northwest and southeast of our land ownership. The bund and dredging tip will need to be included within the Crossing Schedule if the cable route or its associated ground works are to intersect with these Trust assets.</p> <p>Whilst HDD methods are proposed, we can find no reference to the proposed depth of the drilling beneath the river bed as was provided with the Cottam and Gate Burton projects. Survey would therefore appear a necessary precaution to establish the geological substrate and depth of riverbed silt in order to calculate an appropriate depth for HDD beneath the tidal waters of the River Trent to prevent sediment mobilisation. This would inform the design process and prevent the mobilisation of silt from the riverbed which would have potentially detrimental impacts on the navigational safety of the River Trent and its ecology.</p> <p>We look forward to ensuring that all survey work of the River Trent, including ground investigations carried out with full consideration for</p>	<p>The Applicant refers the Canal and River Trust to para. 4.5.44 of <b>6.2.4 Environmental Statement - Chapter 4 Scheme Description [APP-042]</b>, which describes parameters of the Horizontal Directional Drilling (HDD) across the River Trent, where the maximum depth of HDD has been set out at 25m. As explained therein, the maximum HDD depth of 25m below ground level has taken account of the water surface level being up to 6 metres below the river bank level; the surface water level being up to 5 metres deep to the silt level and the silt level likely being 1 metre deep before the river bed level. With the average depths for a HDD being 3m below the river bed level this leads to an assumed HDD at 15 meters below river bank level. The maximum HDD depth of 25 metres below ground level is considered to offer some flexibility to account for variation in depths. Agreement has now been reached between the Canal and River Trust and the Applicant on the minimum depth of drilling under the River Trent to be 5m below the river bed on the Cottam Solar Project. This agreement will then be replicated on West Burton and this will be secured through updated protective provisions in the next version of the draft DCO.</p> <p>Notwithstanding the above and in noting the Applicant's precautionary approach in relation to the potential for sediment release, as detailed</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>navigational safety within this commercial waterway and reviewing the technical drawings of the project in relation to the riverbed. The dredging tip site should also be fully surveyed and protected as an operational asset. We propose that this would be in accordance with the mechanisms contained in the protective provisions. Similarly, we look forward to working with the applicant in relation to the launch and reception areas for the river crossing, ensuring appropriate measures are put in place to protect and safeguard our assets, particularly in relation to the dredging tip and its bund. The dredging tip is the subject of an environmental permit and the Trust will need to be satisfied that the proposed works would not cause any of the conditions of that permit to be breached.</p>	<p>within paragraphs 7.2.1 to 7.2.4 of <b>7.17 Outline Ecological Protection and Mitigation Strategy [APP-326]</b>, the Applicant confirms that the working parameters around crossing the River Trent will depend on the results of ground investigations which will inform the detailed design process.</p> <p>The results of the proposed survey and ground investigations will be reviewed by an ecologist to ensure that they are appropriate for the minimisation of potential disturbance to riparian wildlife. Furthermore, the exact siting of the proposed cable installation (specifically, the entry and exit pits and riverbank beneath the crossing line) will be inspected for the potential presence of protected species, such as otter, water vole and nesting birds, as set out in Section 7 of <b>7.17 Outline Ecological Protection and Mitigation Strategy [APP-326]</b>.</p> <p>The Outline Strategy is secured through Requirement 8 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>, which provides that "No part of the authorised development may commence until a written ecological protection and mitigation strategy has been submitted to and approved by the relevant planning authority for that part or, where the phase falls within the administrative areas of multiple relevant planning</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>authorities, each of the relevant planning authorities."</p> <p>Please see the response to CRT-06 above regarding progress on the protective provisions which will be included in the next version of the draft DCO.</p>
CRT-09	Principle of Development	Construction Impacts on the River Trent	<p>"The Trust welcomes measures in the Application documents WB7.1 (Outline Construction Environmental Management Plan) and WB7.17 (Outline Ecological Protection and Mitigation Strategy (EPMS)) which seek to prevent silt and contaminants entering watercourses through the use of sediment/silt traps/temporary dams and engineers overseeing HDD works to ensure an adequate depth is used. We consider the proposed power in the draft DCO for the undertaker to discharge water should, in respect of the River Trent, be subject to the Trust's consent and this, is provided for in the draft protective provisions."</p>	<p>The Applicant notes this comment regarding the measures that are captured within <b>7.1_A Outline Construction Environmental Management Plan Revision A [EN010132/EX1/WB7.1_A]</b> and <b>7.17 Outline Ecological Protection and Mitigation Strategy [APP-326]</b>. Preparation and approval of the final version of these plans is secured in Requirement 13 and Requirement 8 respectively of Schedule 2 to the <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p> <p>The Applicant notes CRT's comments relating to inclusion of protective provisions dealing with the discharge of water and refers CRT to the response to CRT-06 above.</p>
CRT-10	Noise and Vibration	Noise and Vibration Monitoring for the River Trent	<p>"In response to the Trust's pre-application comments regarding noise and vibration as they affect the River Trent, the Trust welcomes that noise monitoring is proposed as set out in the Application document WB7.1 (Outline</p>	<p>The Applicant notes the CRT's welcoming of the noise monitoring requirements as set out in <b>7.1_A Outline Construction Environmental Management Plan Revision A [EN010132/EX1/WB7.1_A]</b>, as secured through</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			Construction Environmental Management Plan). We note that this document does not refer to navigational safety either with regards to noise, or vibration during the proposed directional drilling. These matters should be considered as noise could affect navigational safety and the riverbanks and bed may be adversely affected by vibration causing silt mobilisation. We consider the best means of achieving this is through the attached protective provisions."	<p>Requirement 13 of Schedule 2 to the <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p> <p>This provides that "No part of the authorised development may commence until a construction environmental management plan for that part has been submitted to and approved by the relevant planning authority or, where the part falls within the administrative areas of multiple relevant planning authorities, each of the relevant planning authorities". It further provides that "The construction environmental management plan must be substantially in accordance with the outline construction environmental management plan."</p> <p>The Applicant confirms that details regarding the navigational safety along the River Trent in relation to noise and vibration during horizontal directional drilling will be managed through the requirements of the detailed CEMP which will ensure compliance with the Canal &amp; River Trust Third-Party Works Code of Practice (CoP).</p>
CRT-11	Ecology and Biodiversity	Drilling under the River Trent	In response to the Trust's previous advice the Applicant in application document WB5.13 (Consultation Report Appendix 5.13: Section 42 Applicant Response) notes that additional measures regarding the need to liaise with the Trust prior to finalisation of or undertaking of	Provision is made in <b>7.17 Outline Ecological Protection and Mitigation Strategy [APP-326]</b> (specifically through Section 7) for the survey of candidate or proposed HDD entry and exit pits and associated bankside habitats in advance of the commencement of cable installation works at

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>drilling beneath the River Trent and refers to application document WB7.17 EPMS). Paragraph 8.2.3 of WB7.17 does not specifically mention the Trust whereas application document WB6.2.9 (Chapter 9 (Ecology and Biodiversity) of the Environmental Statement) does mention the IDB in a similar capacity to that which the Trust are requesting.</p> <p>The Application document WB6.2.9 (ES Chapter 9: Ecology and Biodiversity), in particular paragraph 9.7.214, notes that the potential for release of sediment during drilling operations will be minimised by careful siting of drilling entry and exit pits, suitable depth control and visual monitoring. We consider the best means of ensuring that the survey, design and construction methodology protects the ecology of the waterway from sediment release during directional drilling beneath the River Trent is through the attached protective provisions.</p> <p>The Trust recognises the methodology for the protection of biodiversity and ecology found on our dredging tips adjacent to Works packages 5A and 5B and welcomes further survey work on this land to further inform the Applicant of necessary mitigation measures in respect of these works packages. The Trust would be able to consider</p>	<p>the River Trent. The advice provided by the CRT here, as well as the protective provisions, is acknowledged and will be incorporated as appropriate into working protocols. Agreement has now been reached between the Canal and River Trust and the Applicant on the minimum depth of drilling under the River Trent to be 5m below the river bed on the Cottam Solar Project. This agreement will then be replicated on West Burton and this will be secured through updated protective provisions in the next version of the draft DCO.</p> <p>Requirement 8 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> provides that "No part of the authorised development may commence until a written ecological protection and mitigation strategy has been submitted to and approved by the relevant planning authority for that part or, where the phase falls within the administrative areas of multiple relevant planning authorities, each of the relevant planning authorities."</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			the detailed design of those works through the CoP and protective provisions.	
CRT-12	Landscape and Visual Impact  Ecology and Biodiversity	Lighting during Construction	The Application document WB7.17 (EPMS) notes that lighting impacts on retained habitats, bats and freshwater fish are reduced through measures to minimise the need for lighting and the timing of its usage, during all project phases. The EMPS, at paragraph 5.2.2, confirms that no artificial lighting will be employed during works to cross the River Trent and the Trust supports this approach, which will also assist with navigational safety of the River Trent as a commercial waterway. We consider the best means of ensuring navigational safety is not affected by site lighting is through the attached protective provisions.	<p><b>6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> (the 'LVIA') takes account of lighting and sets out (Table 8.49) that lighting <i>"Will be limited to downlights within substations and energy storage areas only and used when maintenance or security is required. All visible lighting would be 50W, installed at a maximum height of 4m with cowls fitted to prevent light spillage. There will be no lighting on perimeter fencing"</i>.</p> <p>The LVIA [APP-046] considers that for some aspects of the Scheme (the construction stages in particular), the visual effects of lighting may be an issue. During operation stages, the LVIA sets out (Table 8.49) that mitigation would assist <i>"New planting along the boundary of substations and energy storage areas to filter the presence in the landscape and provide softening and screening"</i>.</p> <p>The Applicant confirms that the measures to ensure lighting impacts do not impact upon navigational safety are to be upheld through the protective provisions set out in <b>7.17 Outline Ecological Protection and Mitigation Strategy [APP-326]</b>, which is secured through Requirement 8 of Schedule 2 in <b>3.1_A Draft Development</b></p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p><b>Consent Order Revision A [EN010132/EX1/WB3.1_A].</b></p> <p>Please also refer to response CRT-06 above regarding protective provisions.</p>
CRT-13	Landscape and Visual Glint and Glare	Navigational Safety along the River Trent	<p>"The Trust is satisfied that the applicant has considered the impact of the solar panels on the navigational safety of the River Trent in Application documents WB6.2.16 (ES Chapter 16: Glint &amp; Glare) and WB6.3.16.1 (Appendix 16.1: Solar Photovoltaic Glint and Glare Study). This concludes that distance, topography and vegetation would screen the proposed panels from view from the River Trent as a commercial waterway and leisure boating route.</p> <p>In terms of visual impact additional views from the Trent Valley Way (located on top of the western EA flood bank) are provided in Application document WB6.3.8.3 (ES Landscape and Visual Impact Assessment Appendix 8.3.1.3: Viewpoint Non-Significant) on pages 35-42 and describes the impact of the project as not significant. The impact as viewed from the lower water by our leisure users would be further mitigated by the increase in topographical screening.</p> <p>Application document WB6.2.8 (ES Chapter 8: Landscape and Visual impact) states that no permanent above ground structures are</p>	<p>The Applicant notes this comment.</p> <p>The Applicant notes the Trust's comments relating to inclusion of protective provisions dealing with any works that may affect the navigational safety and ecology of the waterway and refers the Trust to response CRT-06 above.</p>



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			proposed on either side of the River Trent as part of the directionally drilled cable crossing and that during the construction period there are likely to be temporary construction compounds that will be removed on completion of the works. We consider the best means of considering the impact of temporary constructions on navigational safety and ecology of the waterway is through the attached protective provisions."	
CRT-14	Principle of Development Transport and Access	Works Traffic along the River Trent	We note that the use of the River Trent for the transportation of freight to site is considered within Application document WB6.2.14 (ES Chapter 14: Transport and Access) and WB6.3.14 (ES Appendix 14.2: Construction Traffic Management Plan) where Figure 6.1: Abnormal Loads, on page 20, shows that the existing Cottam wharf lies on the west bank of the River Trent and the abnormal loads are proposed to be delivered only to sites on the east side of the river. The Trust is satisfied that this explains the current approach, but would wish to ensure, through the protective provisions, that if the waterway is proposed for commercial use in connection with the Project the Trust would have oversight of this. For instance, a river crossing by boat might be desired for monitoring/ease of communications between the two sides of the River Trent during construction (the distance by road is approximately 14 miles), which would	As set out in paragraph 6.7 of the <b>.3.14.2_A Environmental Statement - Appendix 14.2 Construction Traffic Management Plan Revision A [EN010132/EX1/WB6.3.14.2_A]</b> , abnormal loads will be delivered to the Immingham Docks. From here they will use the A160, A180 and M180 to reach the A15 and subsequent local access roads to reach the Site.  At this stage, it is not expected that the waterway beyond Immingham Docks will be used to transport equipment to the Site. However, if this approach changes, the Trust will be informed.  The protective provisions described in CRT-06 above control "specified works" undertaken for the purposes of the Scheme, including use of the river.

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			need temporary jetties and an agreed method for crossing the main navigational route.	

**Table 2.3.5: Applicant's Response to Cllr Richard Butroid [RR-055]**

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
CRB-01	Soils and Agriculture Ecology and Biodiversity Other Environmental Matters (Human Health / Major Accidents and Disasters) Air Quality Landscape and Visual Impact Socio-Economics, Tourism and Recreation	Direct Impacts as a Result of the Scheme	"The main issues are, loss of farmland, impact on wildlife due to fencing of the site, concerns over battery storage and fire, loss of views and the feeling of being part of the countryside, and the effect this will have on mental health of residents."	The land included in the Scheme covers 4 farm businesses, all of which are owner occupiers of the land within the Sites. This is detailed in full in para. 7.1.2 to 7.1.29 of <b>6.3.19.1 Environmental Statement - Appendix 19.1 Agricultural Land Quality, Soil Resources and Farming Circumstances Report [APP-137]</b> .  Resultingly, the Scheme is anticipated to lead to a maximum loss of approximately 13 full-time equivalent agriculture jobs, as stated in paragraph 18.7.15 of document <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b> . The Scheme is estimated to employ 6 full-time equivalent employees from the local area during operation; see Table 18.16. The net change in employment in the local area (defined as West Lindsey and Bassetlaw Districts) during the Scheme's operational life is a loss of approximately 2 full-time jobs, once consideration of direct, indirect and induced

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>employment, and impacts on the tourism and recreation industry are considered (see para. 18.7.81). Overall, the economic benefit to the local area is estimated to be £1.5 million per year (see para. 18.7.99).</p> <p>As the Scheme will be decommissioned there will not be a permanent loss of agricultural land resource. Furthermore, the majority of the agricultural land can remain in productive use through the operational period, through uses such as being grazed by livestock. (see Section 19.10 of <b>6.2.19 Environmental Statement - Chapter 19 Soils and Agriculture [APP-056]</b>).</p> <p>The impact on wildlife resulting from the erection of fencing has been assessed within <b>6.2.9 Environmental Statement - Chapter 9 Ecology and Biodiversity [APP-047]</b>. The majority of animal species such as invertebrates, reptiles, birds, small mammals, larger mammals such as badgers, hedgehogs, polecats and hares will not be impeded by fencing as they will be able to pass under, over or through the fencing and will be able to freely move through the operational sites. An impact on the movement of deer is likely (see paragraph 9.6.5 of <b>6.2.9 Environmental Statement - Chapter 9: Ecology and Biodiversity [APP-047]</b>), although it is acknowledged from the ecological monitoring of numerous active solar schemes that deer are</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>regularly noted within the fenced areas having exploited locations of undulating terrain and other opportunities for entry.</p> <p>Human health and other environmental impacts resulting from plumes from potential battery fires have been initially assessed in <b>6.2.17 Environmental Statement - Chapter 17 Air Quality [APP-055]</b> and are proposed to be supplemented by additional information during the examination process. The Applicant has been in discussions with UKHSA and will be providing a supplementary information regarding air quality impacts resulting from solar panel and BESS fires to address this issue which is to be submitted by Deadline 1.</p> <p>The supplementary information will include the following:</p> <p>Further discussions were held with the UKHSA in a meeting on 8th June 2023. During the meeting it was agreed that (1) there is currently no policy, legislation, or guidance which provides clarity on the methodology for undertaking a Battery Energy Storage System (BESS) Fire Risk Assessment, and (2) there is currently no policy, legislation, or guidance which provides clarity on the methodology for undertaking a Solar Panel Fire Modelling Assessment.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>However, it was agreed with the UKHSA that the following approach is considered appropriate:</p> <ul style="list-style-type: none"> <li>• Undertake an additional Solar Panel Fire Modelling Assessment using ADMS software to determine pollutant levels of Particulate Matter (PM<sub>10</sub> and PM<sub>2.5</sub>) at sensitive receptors. The report will include details of the justification of the assessment methodologies. The predicted pollutant concentrations at receptor locations will be assessed and compared against UK Air Quality Standards; and</li> <li>• Undertake a BESS Fire Risk Assessment using AERMOD dispersion model software to determine pollutant levels of NO<sub>2</sub>, HCl, HF, and Particulate Matter (PM<sub>10</sub> and PM<sub>2.5</sub>). The report will include details of the justification of the assessment methodologies. The predicted pollutant concentrations at receptor locations will be assessed and compared against UK Air Quality Standards, occupational exposure limits (OELs) and the UK Daily Air Quality Index (DAQI).</li> </ul> <p>A BESS fire action plan, which includes good practice safety measures, will be produced to be implemented in the case of a BESS Fire.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>The BESS fire action plan will include the following:</p> <p><i>"The site manager/fire safety representative will need to assess the fire location(s), wind directions and surrounding receptors. The site manager/fire safety representative will take appropriate actions accordingly. The actions to be taken include:</i></p> <p><i>(1) to inform any potentially affected residents, especially those that are located at downwind locations to the BESS fire;</i></p> <p><i>(2) to cancel outdoor events and keep windows closed for any potentially affected residents, especially those that are located at downwind locations to the BESS fire; and</i></p> <p><i>(3) to stop any farming activities and to move any farmers/workers within a specified distance (to be identified in the fire risk assessment) from the BESS fire to a cleaner air location."</i></p> <p>Following the implementation of the Fire Action Plan, there will be no significant risk of harm to human health as a result of fires or unconfined explosions within the BESS compound.</p> <p><b>Environmental Statement - Chapter 17 Air Quality [APP-055]</b> includes a full and detailed assessment that deals with air quality impact and effect at nearby sensitive receptors during construction, operation and decommissioning</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>phases. The assessment concluded that there are not any likely significant effects on air quality as a result of the Scheme.</p> <p>Following the implementation of the appropriate site-specific mitigation measures, the significance of the effects from dust and PM<sub>10</sub> emissions associated with the construction works is considered to be 'negligible' at all receptors, which is 'not significant' in EIA terms. This is based on the IAQM Guidance.</p> <p>Risks to human health as a result of fires or unconfined explosions within the BESS compound are set out in paragraphs 21.6.42 to 21.6.48 of <b>6.2.21 Environmental Statement - Chapter 21 Other Environmental Matters [APP-059]</b> which concludes that there is no significant risk of harm to human health due to the physical separation of the BESS compound from publicly accessible areas.</p> <p>Paragraph 4.1.18 of <b>7.9 Outline Battery Storage Safety Management Plan [APP-318]</b> explains that the design of the BESS has integrated fire detection and suppression systems that will automatically operate to contain battery fires. Paragraph 5.3 <b>[APP-318]</b> states that if fire spreads to multiple units, external firefighting water facilities are available by means of 228,000 litre water storage tanks within the battery</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>compounds. A full Battery Storage Safety Management Plan will be submitted and approved prior to commencement of development as secured through Requirement 6 of Schedule 2 to <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p> <p><b>6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> (the 'LVIA') includes a full and detailed assessment that deals with both direct impacts and effects on the landscape itself and on the visual amenity of people. The LVIA process is iterative and as a result, the design of the Scheme changes to respond to the findings of the assessment to ensure that landscape mitigation is fully incorporated into the Scheme.</p> <p>Mitigation, including offsets and planting, is proposed to address and minimise adverse effects on the character and visual amenity of the local landscape. This is in line with the agreed methodology and the hierarchy of approach advocated by the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition and was agreed with Lincolnshire County Council and Nottinghamshire County Council at the series of workshops, as set out in <b>6.3.8.4 Environmental</b></p>



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p><b>Statement - Appendix 8.4 Consultation [APP-075].</b></p> <p>The Applicant is cognisant of the significance of the countryside for physical and mental wellbeing and, as such, likely impacts on the desirability and use of recreational facilities in the countryside, such as public rights of way, have been assessed in Section 18.7 of <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b>. The greatest level of effect to access, desirability and use of recreational facilities is limited to short- to medium-term moderate adverse effects on long distance recreational routes (the Trent Valley Way and National Byways) during construction (see Table 18.15 and para. 18.7.62). This is a <b>significant adverse</b> effect. This is however the only significant effect anticipated, with no greater than moderate-minor adverse anticipated to any other recreational receptor during construction (see paras. 18.7.60 to 18.7.69), or to any recreational receptor during operation (see paras. 18.7.107 to 18.7.117) and decommissioning (see paras. 18.7.147 to 18.7.157). These effects are not anticipated to be significant.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				This is re-iterated in Section 21.5 of <b>6.2.21 Environmental Statement - Chapter 21 Other Environmental Matters [APP-059]</b> .
CRB-02	General	Property Value	"Reduction in house prices and the ability to sell your home."	Property value is not a material consideration in the consideration and determination of DCOs, and has therefore not been assessed.
CRB-03	Transport and Access	Traffic Movements	"The concerns of excess vehicles and the damage this will do to our road system."	<p>An Outline Construction Traffic Management Plan (CTMP) has been prepared to support the application within <b>6.3.14.2_A Environmental Statement - Appendix 14.2 Construction Traffic Management Plan Revision A [EN010132/EX1/WB6.3.14.2_A]</b>.</p> <p>The outline CTMP submitted as part of the DCO application provides a framework for the management of construction vehicle movements to and from the Scheme, to ensure that the effects of the temporary construction phase on the local highway network are minimised and made acceptable. <b>.3.14.2_A Environmental Statement - Appendix 14.2 Construction Traffic Management Plan Revision A [EN010132/EX1/WB6.3.14.2_A]</b> covers:</p> <ul style="list-style-type: none"> <li>Construction methodology;</li> <li>Site access;</li> <li>Construction vehicle trip generation;</li> <li>Construction vehicle routing;</li> </ul>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>Abnormal load movement; and Mitigation and management measures.</p> <p>By example, measure 'xx' in Section 7 of <b>.3.14.2_A Environmental Statement - Appendix 14.2 Construction Traffic Management Plan Revision A [EN010132/EX1/WB6.3.14.2_A]</b> is for a road condition survey. This will ensure that any identified highways defects resulting from construction activities associated with the Scheme will be corrected to the satisfaction of the local highway authority.</p> <p>The Transport Assessment within <b>6.3.14.1_A Environmental Statement - Appendix 14.1 Transport Assessment Revision A [EN010132/EX1/WB6.3.14.1_A]</b> provides an assessment of the transport effects of the Scheme and concludes, through paragraphs 11.1 to 11.11, that the Scheme is acceptable the perspective of transport effects.</p>
CRB-04	Principle of Development Landscape and Visual Impact	Cumulative Impacts	"The final point for now and one of the most important is this application is just one of a number of application in a very small area and the overall affect will be devastating for the area and residents as the whole landscape will be changed for a generation."	The judgements on the likely significant cumulative effects and conclusions for the landscape and visual receptors are set out within Section 8.10 of <b>6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> (the 'LVIA'), <b>6.3.8.2 Environmental Statement - Appendix 8.2 Assessment of Potential Landscape Effects [APP-073]</b> and <b>6.3.8.3 Environmental</b>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p><b>Statement – Appendix 8.3 Assessment of Potential Visual Effects [APP-074].</b></p> <p>The assessment of the impacts of the Scheme alongside the proposed Cottam, Gate Burton and Tillbridge Solar concludes that cumulatively the proposals would not result in significant adverse effects on landscape character and visual amenity over an extensive area.</p>

**Table 2.3.6: Applicant's Response to EDF Energy (Thermal Generation) Limited [RR-077]**

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
EDF-01	The Representation	Context of EDF's Representation	<p>"This relevant representation is submitted on behalf of EDF Energy (Thermal Generation) Limited ("EDF") requesting that EDF is treated as an Interested Party for the Examination of the DCO application for the West Burton Solar Project (PINS reference EN010132) (the "Project"). EDF owns West Burton A Power Station, a closed coal-fired power station in close proximity to the proposed Order Limits, through which part of the proposed cable corridor of the Project will run. The station ceased generating in March 2023 and EDF has responsibility for the safe decommissioning and demolition of the power station assets. West Burton A Power Station houses critical third-party live infrastructure,</p>	<p>The Applicant notes this comment and notes that discussions are ongoing with EDF to develop protective provisions to be included within the draft DCO that will protect the EDF's existing rights and infrastructure.</p> <p>The requirement for on-site surveys to ground-truth the location of utilities is established in para 21.3.4 and 21.3.5 of <b>6.2.21 Environmental Statement – Chapter 21 Other Environmental Matters [APP-059]</b> and detailed within Table 3.14 of <b>7.1_A Outline Construction Environmental Management Plan Revision A [EN010132/EX1/WB7.1_A]</b>. The production of a detailed CEMP has been secured by Requirement 13 of Schedule 2 of <b>3.1_A Draft Development</b></p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			including those of West Burton B CCGT Power Station which remains operational."	<b>Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> . The Applicant is committed to consultation and agreement with operators and/or owners of utility infrastructure that is likely to be directly impacted by the location or design of the Scheme.
EDF-02	Principle of Development (DCO)	Draft DCO: Protective Provisions	"While EDF is, in principle, supportive of the Project, it has concerns regarding the interface between the Project and West Burton A Power Station which require to be resolved. The Book of Reference ("BoR") identifies plots 10-183, 10-184 and 10-185 (the "EDF Plots") as land owned by EDF over which compulsory acquisition powers to permanently acquire new rights are sought. To safeguard EDF's interests, the safety and integrity of current operations, the ongoing decommissioning, and potential future development, EDF objects to the inclusion of the EDF Plots in the DCO and the compulsory powers in respect of such plots. EDF will require appropriate protection to ensure that the Project does not jeopardise continuing or future operations or site decommissioning and demolition. EDF's rights of access to inspect, maintain, renew and repair such infrastructure must also be maintained at all times and access to inspect and maintain such apparatus must not be restricted."	The Applicant notes this comment and notes that the parties are currently negotiating protective provisions for the protection of EDF's undertaking which will, among other things, maintain EDF's rights of access to inspect, maintain, renew and repair any apparatus that interacts with the Scheme. The Applicant is confident that a form of protective provisions can be agreed with EDF prior to the end of the Examination, which will ensure that EDF's statutory undertaking is not subject to serious detriment as a result of the Scheme.

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
EDF-03	Principle of Development (DCO)  Other Environmental Matters (Telecoms & Utilities)	Existing Third Party Utilities and Infrastructure	"There is existing third-party critical infrastructure on the site (two Exolum Oil Pipelines, the West Burton B Gas Pipeline, numerous 132Kv and 400Kv cables, underground and overground cables owned by National Grid and potable water supplies owned by Severn Trent Water). Any infrastructure or operations associated with the Project must protect this third-party infrastructure and be undertaken in full compliance with the terms of existing legal agreements and obligations."	The requirement for on-site surveys to ground-truth the location of utilities is established in para 21.3.4 and 21.3.5 of <b>6.2.21 Environmental Statement – Chapter 21 Other Environmental Matters [APP-059]</b> and detailed within Table 3.14 of <b>7.1_A Outline Construction Environmental Management Plan Revision A [EN010132/EX1/WB7.1_A]</b> . The production of a detailed CEMP has been secured by Requirement 13 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> . The Applicant is committed to consultation and agreement with operators and/or owners of utility infrastructure that is likely to be directly impacted by the location or design of the Scheme, and protective provisions for the benefit of various statutory undertakers and other affected third parties are included in the draft DCO [APP-17].
EDF-04	Principle of Development (DCO)	Draft DCO: Protective Provisions for Future Projects	"The West Burton A site has also been selected by the UK Atomic Energy Authority for the development of the UK's first Nuclear Fusion Plant, with the potential to yield significant quantities of low carbon energy, generate employment opportunities and encourage investment in the region. EDF wish to facilitate the implementation of this project and other potential future development opportunities at the site. It is therefore imperative that the	The Applicant notes this comment and refers EDF to the response to EDF-02 regarding protective provisions.

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			proposed cable route for the Project does not sterilise development land or detract from future development plans. EDF will require protective provisions to be included within the draft DCO for the Project to ensure that its interests are adequately protected and to ensure compliance with relevant safety, decommissioning and third-party obligations."	
EDF-05	Principle of Development (DCO)	DCO Requirement for Consultation	"Additionally, EDF recommend that a pre-commencement requirement be imposed under the DCO, if granted, related to the approval of the final cable routing and that EDF be a named consultee for subsequent discharge of such a requirement."	The Applicant disagrees with the request for a pre-commencement requirement to be added to the draft DCO related to the approval of the final cable routing and with EDF as a named consultee. To the extent that the final proposed cable route may affect EDF's assets, the protective provisions are the appropriate mechanism for EDF to approve the detailed design of the cable installation and impose any reasonable requirements that they consider necessary to afford them with sufficient protection.
EDF-06	General	Engagement with Applicant	"EDF is liaising with the Promoter in relation to the proposed route and such protective provisions, along with any supplementary agreements which may be required. EDF reserves the right to make further representations as part of the Examination process but in the meantime will continue to liaise with the Promoter with a view to reaching a satisfactory agreement."	The Applicant notes this comment and welcomes continued liaison with EDF Energy (Thermal Generation) Limited.

**Table 2.3.7: Applicant's Response to Forestry Commission [RR-093]**

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
FC-01	Site Description	Woodland within or Bounding the Order Limits	"We note that there is no woodland within the site proposed site, however there are several small woodlands along the boundary of the site."	The Applicant notes this comment.
FC-02	Principle of Development Ecology and Biodiversity	Offsets to Existing Woodland	"Although is stated in Appendix 9.12 Biodiversity Net Gain Report, section 4.2.5 that "All woodland within the Sites will be retained with no change. A minimum of 20m ecological buffer will be incorporated between the footprint of the solar array and the woodland edge."	The Applicant notes this comment.
FC-03	Landscape and Visual Impact Ecology and Biodiversity	Design of Boundary Treatment	"We also note the proposed woodland shelter planting, at several points around the site and the proposed post and wire fencing. If the trees are to be directly adjacent to the fence, we have concerns about wildlife including hedgehogs or birds potentially becoming stuck in the fence."	The effects associated with the proposed fencing have been taken into consideration in the assessment of both the landscape and visual effects, which is set out within <b>6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> (the 'LVIA'). The detailed assessment information can be found within the individual receptor sheets at <b>6.3.8.2 Environmental Statement - Appendix 8.2 Assessment of Potential Landscape Effects [APP-073]</b> and <b>6.3.8.3 Environmental Statement - Appendix 8.3 Assessment of Potential Visual Effects [APP-074]</b> . The assessment has taken account of the heights and location and positioned the fencing within the Scheme to ensure the best possible fit with the landscape. The photography and photomontage information at <b>6.4.8.13.1-</b>



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p><b>6.4.8.13.72 Environmental Statement - Figures 8.13.1-72 [APP-194 to APP-265]</b> shows how the fencing is integrated. For example, <b>6.4.8.13.26 Environmental Statement - Figure 8.13.26 Viewpoint 26 Photography and Photomontage [APP-219]</b> shows the fencing set back from the existing highway to allow for proposed thickening and growth of the new hedgerow and how the design reduces its prominence in the context of the panels and other infrastructure.</p> <p>The design also takes account of the spatial legibility for grazing and the migration of animal species since the fence comprises an open permeable mesh of a design that promotes the passage of animals through and across its bounds.</p> <p>The impact on wildlife resulting from the erection of fencing has been assessed within <b>6.2.9 Environmental Statement - Chapter 9 Ecology and Biodiversity [APP-047]</b>. The majority of animal species such as invertebrates, reptiles, birds, small mammals, larger mammals such as badgers, hedgehogs, polecats and hares will not be impeded by fencing as they will be able to pass under, over or through the fencing and will be able to freely move through the operational sites. An impact on the movement of deer is likely (see paragraph 9.6.5 of <b>6.2.9 Environmental Statement - Chapter 9: Ecology and</b></p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p><b>Biodiversity [APP-047]</b>), although it is acknowledged from the ecological monitoring of numerous active solar schemes that deer are regularly noted within the fenced areas having exploited locations of undulating terrain and other opportunities for entry.</p>
FC-04	Landscape and Visual Impact  Ecology and Biodiversity	Proposed Planting Species	<p>"Shown on Figure 8.18.1 – Landscape and Ecology Mitigation and Enhancement Measures – West Burton 1, we have concerns about the proposed Miscanthus planting behind the woodland shelter belt and proposed successional scrub along the edge of the development by Broxholme/Grange Farm. We would suggest this is changed for a native species such as a Deschampsia variety rather than the non native Miscanthus."</p>	<p><b>6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> (the 'LVIA') sets out (Table 8.49) how the new planting is designed to reflect landscape character and policy expectations using a palette of native tree and shrub species that are appropriate to the location. It is therefore reasonable not to change Miscanthus for Deschampsia on the basis that within the LVIA, the mitigation measures are designed to reflect the agricultural character of the area. Although non-native, Miscanthus forms a common feature and is already present in the locality. Furthermore, Miscanthus giganteus can reach up to 3 to 4 meters in height it helps improve soil quality, reduce soil erosion and would not look out of place. By comparison, Deschampsia cespitosa (tufted hairgrass), although native to the UK, is commonly found in boggy, acidic conditions and only grows to 1.5m tall.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
FC-05	Landscape and Visual Impact Ecology and Biodiversity	Resilience to Climate Change and Assurance of Biosecurity	"Species and provenance of new trees and woodland will also need to be considered to establish a more resilient treescape which can cope with the full implications of a changing climate. When planting new trees and woodland, ensure that biosecurity is robust to avoid the introduction of pests and diseases."	<p>The Applicant accepts that plant health and security issues present a major threat to ecosystem resilience.</p> <p><b>6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> (the 'LVIA') sets out (Table 8.49) how the new planting is designed to reflect landscape character and policy expectations using a palette of native tree and shrub species that are appropriate to the location.</p> <p>The Landscape Institute (LI) has published a new plant health and biosecurity toolkit for landscape consultants to prioritise action against pests and diseases that threaten crops, trees and landscapes in every part of the supply chain. This biosecurity best practice is designed to be embedded in every stage of a project, from landscape assessment through to management.</p> <p><u><a href="#">Adherence to this is set out within 7.3 A Outline Landscape and Ecological Management Plan Revision A [EN010132/EX1/WB7.3 A] (the 'oLEMP')</a></u> and will be secured through Requirement 7 in Schedule 2 of 3.1 A Draft Development Consent Order Revision A</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<a href="#">[EN010132/EX1/WB3.1_A]</a> . Please refer to paras 4.3.12, 4.8.1, 4.8.2 and 4.9.5 of the oLEMP, which promotes appropriate management of all hedgerows within the Site especially those damaged as a result of the drift of herbicides/pesticides.

**Table 2.3.8: Applicant's Response to National Grid Electricity Distribution (East Midlands) [RR-230]**

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
NGED-01	The Representation	Context of NGED's Representation	"NGED is the licensed distribution network operator under Section 6 Electricity Act 1989 (the "EA 1989") for the area in which the West Burton Solar Project DCO 202* (the "Order") is proposed to have effect. Section 9 of the EA 1989 places a duty on NGED as the electricity distributor to develop and maintain an efficient, co-ordinated and economical system of electricity distribution."	The Applicant notes this comment.
NGED-02	Site Description Other Environmental Matters (Telecoms & Utilities)	Impacts of NGED Land and Assets within Order Limits	"The application includes land in or upon which NGED may have assets and which may include (but are not limited to) high voltage electricity cables. NGED is currently reviewing the draft Order setting out the Authorised Development to establish the extent to which their apparatus and interests are affected."	The Applicant notes this comment.  The requirement for on-site surveys to ground-truth the location of utilities is established in para 21.3.4 and 21.3.5 of <b>6.2.21 Environmental Statement - Chapter 21 Other Environmental Matters [APP-059]</b> and detailed within Table 3.14 of <b>7.1_A Outline Construction Environmental Management Plan Revision A [EN010132/EX1/WB7.1_A]</b> . The production of a detailed CEMP has been secured by Requirement

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				13 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> . The Applicant is committed to consultation and agreement with operators and/or owners of utility infrastructure that is likely to be directly impacted by the location or design of the Scheme.
NGED-03	Principle of Development (DCO)	Draft DCO: Protective Provisions	"While NGED will continue to seek to have positive engagement with the applicant in relation to the project, NGED needs to ensure that the wider powers being sought in the Order will not have a detrimental impact on NGED's electricity network and its duties under the EA 1989. This includes ensuring acceptable terms of any proposed protective provisions."	<p>The Applicant notes this comment, and is committed to consultation and agreement with operators and/or owners of utility infrastructure that is likely to be directly impacted by the location or design of the Scheme.</p> <p>The Applicant is negotiating protective provisions with NGED to ensure that its statutory undertaking is not subject to serious detriment as a result of the Scheme. Draft protective provisions are included in Part 4 of Schedule 16 to the <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>, and these include various provisions designed to protect NGED's undertaking. The Applicant is confident that agreement can be reached with NGED prior to the close of the Examination.</p>
NGED-04	Principle of Development (DCO)	Draft DCO: Protective Provisions	"NGED is therefore making this representation as a holding objection to the application until an asset protection arrangement has been agreed between the parties. No formal agreement has	The Applicant notes this comment and looks forward to working with NGED to agree a suitable asset protection arrangement as the Examination progresses. The Applicant refers NGED to its

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			yet been concluded and accordingly we are lodging this representation to protect NGED's position pending conclusion of an appropriate agreement. Once NGED is satisfied that its network is protected, we will notify the Planning Inspectorate promptly and withdraw the objection."	response at NGED-03 above regarding protective provisions.

**Table 2.3.9: Applicant's Response to National Grid Electricity Transmission [RR-231]**

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
NGET-01	Principle of Development (DCO)	National Grid Apparatus	"This relevant representation is submitted on behalf of National Grid Electricity Transmission Plc ("National Grid") in respect of the Project, and in particular National Grid's infrastructure and land which is within or in close proximity to the proposed Order Limits. National Grid will require appropriate protection for retained apparatus including compliance with relevant standards for works proposed within close proximity of its apparatus."	<p>The Applicant notes this comment, and is committed to consultation and agreement with operators and/or owners of utility infrastructure that is likely to be directly impacted by the location or design of the Scheme.</p> <p>The Applicant is negotiating protective provisions with NGET to ensure that its statutory undertaking is not subject to serious detriment as a result of the Scheme. Draft protective provisions are included in Part 3 of Schedule 16 to the <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>, and these include various provisions designed to protect NGET's undertaking. The Applicant is confident that agreement can be reached with NGET prior to the close of the Examination.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
NGET-02	Principle of Development (DCO)	Rights of Access	"National Grid's rights of access to inspect, maintain, renew and repair such apparatus must also be maintained at all times and access to inspect and maintain such apparatus must not be restricted."	As noted at NGET-01, the Applicant is negotiating protective provisions with NGET to ensure that its statutory undertaking is not subject to serious detriment as a result of the Scheme. Draft protective provisions are included in Part 3 of Schedule 16 to the <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> , and these include rights of access for NGET to inspect, maintain, renew and repair any apparatus that interfaces with the Scheme.
NGET-03	Principle of Development (DCO)	Acquisition of Land and/or Rights	"Further, where the Applicant intends to acquire land or rights, or interfere with any of National Grid's interests in land or National Grid's apparatus, National Grid will require appropriate protection and further discussion is required on the impact to its apparatus and rights."	As noted at NGET-01, the Applicant is negotiating protective provisions with NGET to ensure that its statutory undertaking is not subject to serious detriment as a result of the Scheme. Draft protective provisions are included in Part 3 of Schedule 16 to the <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> , and these include the requirement that the undertaker can only acquire or interfere with NGET's land interests or apparatus by agreement.
NGET-04	Principle of Development (DCO) Other Environmental Matters	National Grid Infrastructure within/in Close Proximity to the Proposed Order Limits	"National Grid owns or operates the following infrastructure within or in close proximity to the proposed Order Limits for the Project: Electricity Transmission NGET has a substation and high voltage electricity overhead transmission lines within or in close proximity to the proposed Order Limits including West Burton 400kV	The location of underground and overhead infrastructure has been identified and preliminary offsets as required by easements and operator safety distances have been embedded in the Scheme design, as set out in Table 21.6.2 of <b>6.2.21 Environmental Statement - Chapter 21 Other Environmental Matters [APP-059]</b> , and in

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
	(Telecoms & Utilities)		<p>Substation. The substation and overhead lines form an essential part of the electricity transmission network in England and Wales. The details of the electricity assets are as follows:</p> <p>Substations: West Burton 400kV Substation, Associated cables, Associated fibre cable</p> <p>Overhead Lines:</p> <ul style="list-style-type: none"> <li>• ZDA 400kV Cottam – Keadby 1, Cottam – Keadby 2, Cottam – West Burton, Keadby – West Burton 1, Keadby – West Burton 2, High Marnham – West Burton</li> <li>• 4ZM 400kV Bicker Fen - Spalding North - West Burton, Bicker Fen - Walpole - West Burton</li> <li>• 4TM 400kV Keadby – West Burton 1, Keadby – West Burton 2</li> <li>• 4VE 400kV Cottam – Keadby 1, Cottam – Keadby 2”</li> </ul>	<p>Section 5.4 and 5.5 of <b>7.6 Design and Access Statement [APP-314]</b>. Furthermore, the requirement for on-site surveys to ground-truth the location of utilities is set out in paragraphs 21.3.4 and 21.3.5 of <b>6.2.21 Environmental Statement - Chapter 21 Other Environmental Matters [APP-059]</b>, and secured through <b>7.1_A Outline Construction Environmental Management Plan Revision A [EN010132/EX1/WB7.1_A]</b>. The Applicant is committed to consultation and agreement with operators and/or owners of utility infrastructure that is likely to be directly impacted by the location or design of the Scheme.</p> <p>As noted at NGET-01 above, draft protective provisions are included in Part 3 to Schedule 16 of the <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>, and these include provisions relating to retained apparatus.</p>
NGET-05	The Representation	Context of NGET's Representation	<p>“As a responsible statutory undertaker, National Grid's primary concern is to meet its statutory obligations and ensure that any development does not impact in any adverse way upon those statutory obligations. As such, National Grid has a duty to protect its position in relation to infrastructure and land which is within or in close proximity to the draft Order Limits.”</p>	The Applicant notes this comment.



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
NGET-06	Principle of Development (DCO)	Rights of Access	"As noted, National Grid's rights to retain its apparatus in situ and rights of access to inspect, maintain, renew and repair such apparatus located within or in close proximity to the Order Limits should be maintained at all times and access to inspect and maintain such apparatus must not be restricted."	The Applicant notes this comment and refers NGET to the response to NGET-01 above regarding protective provisions, which include provisions relating to access to assets.
NGET-07	Principle of Development (DCO)	Draft DCO: Protective Provisions	"National Grid will require protective provisions to be included within the draft Development Consent Order (the "Order") for the Project to ensure that its interests are adequately protected and to ensure compliance with relevant safety standards."	The Applicant notes this comment and refers NGET to the response to NGET-01 above regarding protective provisions. The Applicant is confident that a set of protective provisions can be agreed with NGET prior to the close of the Examination.
NGET-08	General	Ongoing Engagement with Applicant	"National Grid is liaising with the Applicant in relation to such protective provisions, along with any supplementary agreements which may be required. National Grid requests that the Applicant continues to engage with it to provide explanation and reassurances as to how the Applicant's works pursuant to the Order (if made) will ensure protection for those National Grid assets which will remain in situ, along with facilitating all future access and other rights as are necessary to allow National Grid to properly discharge its statutory obligations. National Grid will continue to liaise with the Applicant in this regard with a view to concluding matters as soon	The Applicant notes this comment and welcomes continued liaison with National Grid Electricity Transmission.

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			as possible during the DCO Examination and will keep the Examining Authority updated in relation to these discussions"	
NGET-09	Principle of Development (DCO)	Compulsory Acquisition Powers	"As noted, where the Applicant intends to acquire land or rights, or interfere with any of National Grid's interests in land, National Grid will require further discussion with the Applicant. National Grid reserves the right to make further representations as part of the Examination process in relation to specific interactions with its assets but in the meantime will continue to liaise with the Applicant with a view to reaching a satisfactory agreement."	The Applicant notes this comment and refers NGET to the response to NGET-03 above.
NGET-10	Principle of Development	Grid Connection	The Project proposes a connection to West Burton 400kV Substation. In relation to the connection National Grid is working with the Applicant to enter into connection agreements and other commercial arrangements at the relevant time. Further updates will be provided in the Statement of Common Ground.	The Applicant notes this comment and looks forward to continuing to engage with NGET on any additional agreements required in connection with the Scheme.

**Table 2.3.10: Applicant's Response to Parochial Church Council of the Parish of Stow-with-Sturton [RR-245]**

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
PCC-01	The Interested Party	Context of PCC's Representation	"By way of background, and for those not familiar with the organisation of the Church of England, the Parochial Church Council is the statutory	The Applicant notes this comment.

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			body, and a charity exempt in law, responsible for the ecclesiastical parish of Stow-in-Lindsey. Sometimes this parish is also referred to as the parish of Stow-with-Sturton. The Parochial Church Council (hereafter PCC) is responsible for it's parish church, St Mary's Church in the village of Stow."	
PCC-02	General	Chancel Repair Liability	"This church, also known as Stow Minster, dates back to Anglo-Saxon times, with substantial parts of the present building dating back to 975AD. Around 1140 - 1160AD the east end of the building, known as the Chancel, was rebuilt. Part of the responsibility for the repair and maintenance was allocated to various land, the owners of which were duty bound to contribute as and when required. Today, the Chancel Repair Liability (hereafter CRL) lies 55% with the Church Commissioners, 34% with the PCC, and 11% with various pieces of land."	The Applicant notes this comment.
PCC-03	Cultural Heritage	Heritage Significance	"The church is a Grade 1 listed building (NHLE 1146624) and attracts visitors from all over the world. For example, in the last month we have had visitors from South Africa, United States, Slovenia, Czech Republic and Australia (identified via our visitors book - though not all visitors sign the book). The World Monument Fund, a New York based international organisation concerned with the preservation of heritage buildings around the world, included St Mary's Church in	The Applicant acknowledges that St Mary's Church, Stow (NHLE 1146624) is a Grade I Listed Building which constitutes a heritage asset of the highest significance (P.18 of 6.3.13.5 Environmental Statement - Appendix 13.5 Heritage Statement [APP-117].

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			it's 2006 watch list of the 100 most endangered sites in the world. This was a great privilege and humbling to note that there was such international concern for the ongoing maintenance and preservation of the building, which contains a number of internationally significant features."	
PCC-04	The Interested Party	Context of PCC's Representation	"The PCC, in association with the Priest in Charge, also has a duty of care for the souls and wellbeing of the people of the parish. The ecclesiastical parish of Stow-in-Lindsey covers the same geographical area as that overseen by the civil parishes of Stow and Sturton-by-Stow, except that there is a separate ecclesiastical parish of St Edith's Church, Coates-by-Stow which includes the hamlets of Coates-by-Stow and Normanby-by-Stow. It is with the above background that the PCC wishes to make the following observations on the proposals."	The Applicant notes this comment.
PCC-05	Principle of Development (DCO)	Chancel Repair Liability	"Regarding: West Burton (area 3) - the PCC is concerned about the proposals about the use of land at Stow Park and the implication this might have on our right to Chancel Repair Liability. Our concern is compounded in the formal notice of the proposed Section 48 of the Planning Act 2008 application that accompanied your letter of the 14th June 2022 in which we find the following statement at paragraph 4, 2nd bullet point: Compulsory acquisition of land, including	Article 23 of the draft DCO grants powers in respect of all private rights or restrictive covenants over land subject to the compulsory acquisition which the Applicant considers broad enough to include a chancel repair liability. However, such private rights or restrictive covenants will only cease to have effect in so far as their continuance would be inconsistent with the exercise of the rights granted by the DCO.

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			interests in land, rights over land and imposition of restriction, powers to override, suspend or extinguish rights over land and powers for the temporary use of land"	<p>The Applicant considers it very unlikely that the continuance of a right for the Parochial Church Council to collect chancel repair liabilities would be inconsistent with the implementation of the authorised development and as such, considers it unlikely that the powers in the DCO would extinguish any chancel repair liability that was due.</p> <p>Nonetheless, in the event that the exercise of the compulsory acquisition powers did result in the chancel repair liability ceasing to have effect, any loss would be reflected in the calculation of compensation due under Article 23(4).</p>
PCC-06	General (Consultation)	Failure of Applicant to Respond to Communications	"On Tuesday 19th July 2022 the Freephone number [] was contacted at 9.16am by our Churchwarden, [], to seek clarification of the meaning of the above statement in relation to our right of CRL. He was advised by the operative taking the call that someone would respond to discuss the matter. At the time of writing no response has been received."	The Applicant acknowledges and expresses regret for the observed discrepancy. The Applicant notes that written feedback from the Parochial Church Council of the Parish of Stow-with-Sturton on 27/07/22, including the issues raised and how the Applicant has had regard to these in developing the Scheme, can be found in table 5.13.3 of <b>5.13 Consultation Report - Appendix 5.13 - Section 42 Applicant Response [APP-037]</b> .
PCC-07	Principle of Development (DCO)	Impact on CRL Rights and on Listed Building	"In the light of the possibility that our right for CRL may be overridden, suspended or extinguished, and the potential (in the absence of due compensation) this has for the PCC's ability to maintain a Grade 1 listed building of national and international significance the PCC must	The Applicant notes this comment and refers the Party to the response at PCC-06 above.

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			object to the proposal for West Burton 3 in relation to it's location on land to which CRL is attached."	
PCC-08	Principle of Development (DCO)	Resolution of CRL Rights	"There is a process for buying out or 'compounding' the liability. This would be dealt with under the Ecclesiastical Dilapidations Measure 1923 as amended by the Ecclesiastical Dilapidations (Amendment) Measure 1929. The Appendix to this letter outlines our particular area of interest."	[The Applicant notes this comment and refers the Party to the response at PCC-06 above.
PCC-09	Cultural Heritage	PEIR: Impacts on St. Mary's Church	"(Chapter 13 and supporting appendices in the main Preliminary Environmental Impact Reports (PEIR) for both projects are the sources). The PCC is concerned about the impact on St Mary's Church, Stow (Grade 1 of national and international significance NHLE 1146624) which is within 5 kilometres of both developments (c.1.49km to NE of West Burton 3, and c.1.15km to W of Cottam 1). We note the PEIR for West Burton, paragraph 13.4.6 on page 395"	<b>6.3.13.5 Environmental Statement - Appendix 13.5 Heritage Statement [APP-117 to APP-119]</b> , provides a detailed assessment of all Grade II Listed Buildings and Conservation Areas within 2km of the Scheme, and all Grade I and II* Listed Buildings and Scheduled Monuments with a 5km study area surrounding the Scheme. St. Mary's Church, Stow, is discussed in paragraphs 3.1.33 and 3.1.57, and this discussion identified that the village's location on the generally flat topography of the Trent valley means that the setting of the Scheduled Monument and Grade I Listed Building is enclosed by the surrounding built environment and associated vegetation, and no views out into the surrounding landscape from the vicinity of the church are possible, despite the churchyard being raised approximately 1m above the surrounding land. Consequently, there is no visibility of the landscape to the south and south-

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				west where the Scheme would be located, and therefore no resultant impact. Views towards the Church were also assessed, and it was concluded that that the built environment and vegetation associated with Stow village, as well as the neighbouring Sturton-by-Stow, would screen any visibility of the Schemes at West Burton 1 – 3 that otherwise might be visible within these various views. Consequently, this heritage asset was scoped out of further consideration (paragraph 3.1.57 of <b>6.3.13.5 Environmental Statement - Appendix 13.5 Heritage Statement [APP-117 to APP-119]</b> ).
PCC-10	Cultural Heritage	PEIR: Assessment Methodology	“Consequently, this PEIR will identify all designated assets ‘of the highest significance’ within a 5km radius of each of the five Sites under consideration. It is proposed that the assets thus identified will then be taken forward for further assessment in accordance with the methodology detailed in The Setting of Heritage Assets (Historic England 2017). This will involve a ‘sifting’ exercise at Step 1, whereby a suite of techniques will be utilised to ‘scope out’ from further assessment those assets where it is considered that views from, or towards, would not be affected by the proposals. Such techniques would include the use of Zones of Theoretical Visibility (ZTV) maps, viewshed analysis from selected receptors, analysis of online aerial and street view imagery,	As explained in <b>6.3.13.5 Environmental Statement - Appendix 13.5 Heritage Statement [APP-117 to APP-119]</b> (paragraph 3.1.57), St. Mary’s Church Stow was scoped out of further assessment during the ‘sifting exercise at Step 1 which concluded that that the built environment and vegetation associated with Stow village, as well as the neighbouring Sturton-by-Stow, would screen any visibility of the Schemes at West Burton 1 – 3 that otherwise might be visible within these various views.

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			as well as on-site 'ground-truthing' where this is deemed appropriate and where access is possible."	
PCC-11	Cultural Heritage	PEIR: Assessment Methodology	"It is considered likely that this would greatly reduce the quantity of designated assets that would require more detailed analysis in subsequent stages of the assessment. and from Table 13.3, on page 399 the factors to be considered when assessing buildings of major significance (and in this the PCC consider the Grade 1 listed St Mary's Church, Stow to be so categorised) i) Changes to key historic building elements such that the resource is totally altered ?ii) Comprehensive changes to setting (where this affects the significance of the asset)."	The Applicant respectfully disagrees with the interpretation of the 'Factors in the Assessment of Magnitude of Change' table referred to in the PEIR, which can also be found in <b>6.2.13 Environmental Statement - Chapter 13 Cultural Heritage [APP-051]</b> , at Table 13.2. It is considered that 'Changes to key historic building elements such that the resource is totally altered' refers to impacts that would totally alter the fabric of a historic building. 'Comprehensive changes to setting (where this affects the significance of the asset)' would refer to a situation where the immediate setting of a historic building would be drastically altered, thereby having a major effect upon the built asset or the ability to appreciate it. It is considered that neither of these factors apply in the case of St. Mary's Church in relation to the Scheme.
PCC-12	Cultural Heritage Landscape and Visual Impact Socio-economics,	Direct and Cumulative Impacts to the Church	"Regarding the above extracts the PCC notes also Historic England and Lincolnshire County Council Archeology Services are in ongoing discussions about impact assessment generally but these were not yet complete at the time of producing the reports. The PCC wish to record it's concern about potential impacts on the visualisation from distance of St Mary's Church, Stow, the impact on	The Applicant notes this comment. <b>6.2.8 Environmental Statement - Chapter 8: Landscape and Visual Impact Assessment [APP-046]</b> (the 'LVIA') considers both the landscape and visual effects of the Scheme, including the proximity to settlements such as Stow and associated buildings such as St Mary's



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
	Tourism and Recreation		<p>visitor numbers and on surrounding archeology that could inform the history of Stow, and request it's further involvement in the ongoing discussions about the locations and size of West Burton 3 (as indeed it will so request regarding the nearby development proposals for Cottam 1 and Gate Burton Energy Park). It should be noted that St Mary's Church, Stow also appears on Historic England's "Heritage at Risk" register."</p>	<p>Church. This is set out in more detail at 6.3.8.3 ES <b>Appendix 8.3 Assessment of Potential Visual Effects [APP-074]</b>. This assessment includes visual receptors comprising viewpoints VP53, VP54, VP55, VP56, transport receptors T018, T027, T053 and T054, residential receptors R055, R058, R074, R084, R101 and PRoW receptor P024. <b>The visual receptors around St. Mary's Church have been assessed within the LVIA and the effects on these receptors as a result of the Scheme are Not Significant.</b></p> <p>Section 18.7 of <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b> assesses the likely impact of the Scheme on heritage-based tourism receptors and concludes there is no greater than a moderate-minor adverse impact on these assets to tourists and visitors (see paras. 18.7.58, 18.7.105, 18.7.144). As such, these effects are not significant.</p> <p>As detailed in <b>6.2.13 Environmental Statement - Chapter 13 Cultural Heritage [APP-051]</b> assessment works have identified numerous new archaeological sites and have greatly enhanced the archaeological and historic record. During the field evaluation it was identified that ploughing was causing a high level of destruction to archaeological deposits. Consequently, the Applicant believes the Scheme will provide an</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				opportunity to protect archaeological remains that are currently at risk of destruction from agricultural activity [6.2.13 Environmental Statement - Chapter 13 Cultural Heritage [APP-051], Paragraphs 13.7.43 and 13.7.44]. 6.3.13.7 Environmental Statement - Appendix 13.7 Archaeological Mitigation WSI (Written Scheme of Investigation) [APP-122] details the mitigation proposed by the Applicant, enabling a mechanism for archaeological remains to be recorded or preserved in situ. The Applicant notes the comment that St Mary's Church, Stow appears on Historic England's "Heritage at Risk" register" and agrees that this is correct.
PCC-13	Principle of Development (DCO)	Chancel Repair Liability	"The PCC would also point out that any change to the right over land for Chancel Repair Liability would materially affect the ability to maintain St Mary's Church, Stow and thus it can be deemed that any change in CRL is a change to a key historic building element such that the resource is totally altered."	The Applicant notes this comment and refers the Party to the response at PCC-06 above.
PCC-14	General	Observations and Concerns	"The PCC wishes to make the following general observations in exercising its concern for residents of the ecclesiastical parish of Stow-in-Lindsey."	The Applicant notes this comment and has addressed specific points from the Parochial Church Council of the Parish of Stow-with-Sturton in the responses to comments/issues PCC-15 to PCC-23 below.
PCC-15	Transport and Access	Construction HGV Traffic Routing	"Concerns about the local infrastructure's ability to support the construction phase. Local	An Outline Construction Traffic Management Plan (CTMP) has been prepared to support the

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>residents have expressed concern about the inadequacy of class "C" roads, unclassified roads and green lanes to support the heavy vehicle movements required during the construction phase. Such roads, according to knowledgeable locals, were not engineered to support the quantity of heavy traffic envisaged in the projects and are therefore at serious risk of damage. Often quoted is a relatively recent incident of a large vehicle unable to avoid the roadside ditch in the "single" track section of the road between Stow and Ingham which closed the road for several days. Such closure of a well used local routes could easily repeated should these warning concerns not be heeded."</p>	<p>application within <b>6.3.14.2_A Environmental Statement - Appendix 14.2 Construction Traffic Management Plan Revision A [EN010132/EX1/WB6.3.14.2_A]</b>.</p> <p>The outline CTMP submitted as part of the DCO application provides a framework for the management of construction vehicle movements to and from the Scheme, to ensure that the effects of the temporary construction phase on the local highway network are minimised and made acceptable. The Outline CTMP <b>[EN0101/EX1/WB6.3.14.2_A]</b> covers:</p> <ul style="list-style-type: none"> <li>Construction methodology;</li> <li>Site access;</li> <li>Construction vehicle trip generation;</li> <li>Construction vehicle routing;</li> <li>Abnormal load movement; and</li> <li>Mitigation and management measures.</li> </ul> <p>Access to West Burton 1 is via the A1500 and the unnamed road to the south which connects to Broxholme. Through the DCO, and in liaison with Lincolnshire County Council, pass-by bays will be provided to support the low level of daily HGV deliveries (five per day on average). No construction vehicles will travel through Broxholme.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>Access to West Burton 2 is via the B1241 and access to West Burton 3 is via the A1500.</p> <p>Swept path analysis, set out in Appendix D of <b>6.3.14.1_A Environmental Statement - Appendix 14.1 Transport Assessment Revision A [EN010132/EX1/WB6.3.14.1_A]</b> shows the manoeuvre of HGVs accessing the Site.</p> <p>A smaller number of vehicle movements will be associated with the construction of the cable route. These will be managed through the <b>6.3.14.2_A Environmental Statement - Appendix 14.2 Construction Traffic Management Plan Revision A [EN010132/EX1/WB6.3.14.2_A]</b>.</p>
PCC-16	<p>Other Environmental Matters (Human Health)</p> <p>Socio-economics, Tourism and Recreation</p> <p>Landscape and Visual Impact</p> <p>Soils and Agriculture</p>	Impacts on Mental Health and Livelihood	<p>"Concerns about the impact on local residents' mental health. There are two specific examples that have been reported to the Churchwarden. One where there is a potential suicide risk because of the proximity of a scheme to the resident's home - the resident having chosen to live in a rural setting now finds that the proposed development to be disastrous to their wellbeing, and likely to affect the property value should the decision to sell be inevitable because of the disruption and changed environment brought about by the proposed development. In another report, a distraught farmer said that "If I don't rent them the land it will be compulsory</p>	<p>The Applicant acknowledges the comment but notes that the examples relate to two different projects which the Applicant isn't in a position to comment on.</p> <p>Notwithstanding the above, the Applicant directs the respondent to <b>6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> (the 'LVIA') includes a full and detailed assessment that deals with both effects on the landscape itself and effects on the visual amenity of people. The LVIA process is iterative and as a result, the design of the Scheme has changed to respond to the findings of the assessment to ensure that</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
	Principle of Development (DCO)		<p>purchased - either way I lose" and thus felt there was little value in raising objection to the proposed project. These two examples, one of which relates to the Cottam project, the other to the Gate Burton Energy Park project, nevertheless reflect the sentiments expressed to the members of the PCC to these massive solar projects that will surround our parish."</p>	<p>landscape mitigation is fully incorporated into the Scheme.</p> <p>Voluntary consultation with individual property owners was undertaken throughout the duration of the Scheme development and the preparation of the ES including discussion over bespoke mitigation relevant to the individual properties. A number of meetings and visits to the individual properties have taken place to introduce the Scheme and take forward discussions and retain engagement on detailed matters relating the Scheme.</p> <p>The LVIA sets out landscape mitigation that seeks to enhance the landscape character of the Study Area and to reduce the visibility of the Scheme from residential properties and other public vantage points including transport routes, public footpaths, permissive footpaths and green lane network. This mitigation is aimed to benefit the community as a whole to enhance their way of life as well as green infrastructure (see paras. 8.4.44, 8.6.1, 8.6.3 and 8.8.3). Public consultation has also taken account of landscape and visual matters (see paras. 8.2.8 and 8.4.20).</p> <p>The Applicant is cognisant of the significance of the countryside for physical and mental wellbeing and, as such, likely impacts on the desirability and use of recreational facilities in the countryside,</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>such as public rights of way, have been assessed in Section 18.7 of <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b>. The greatest level of effect to access, desirability and use of recreational facilities is limited to short- to medium-term moderate adverse effects on long distance recreational routes (the Trent Valley Way and National Byways) during construction (see Table 18.15 and para. 18.7.62). This is a <b>significant adverse</b> effect. This is however the only significant effect anticipated, with no greater than moderate-minor adverse anticipated to any other recreational receptor during construction (see paras. 18.7.60 to 18.7.69), or to any recreational receptor during operation (see paras. 18.7.107 to 18.7.117) and decommissioning (see paras. 18.7.147 to 18.7.157). These effects are not anticipated to be significant.</p> <p>This is re-iterated in Section 21.5 of <b>6.2.21 Environmental Statement - Chapter 21 Other Environmental Matters [APP-059]</b>.</p>
PCC-17	Energy Need Alternatives and Design Evolution	Cumulative Development	"Overall the local area is in line for FOUR large schemes, not only Cottam and West Burton, but also Gate Burton Energy Park and now Tillbridge Solar. A fifth (but smaller) scheme, located at Stow Park, is also in the planning stage. In addition there are already two large solar farms	Cumulative effects assessments for each topic are set out in each of the ES Chapters and include the assessment of the impacts of the Scheme cumulatively with the NSIPs identified by 7000 Acres (Gate Burton Energy Park, West Burton

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			in the area between West Burton 3 and the Gate Burton Energy park proposal."	<p>Solar Project and Tillbridge Solar Project) (see paragraph 2.5.9 of <b>C6.2.2 ES Chapter 2 EIA Process and Methodology [APP-040]</b>.</p> <p>This assessment is in accordance with Schedule 4 of the 2017 EIA Regulations and PINS Advice Note 17. The mitigation measures set out across the ES therefore account for anticipated cumulative effects.</p> <p>Section 3.3 of <b>7.11 Statement of Need [APP-320]</b> describes Government's view that large capacities of low-carbon generation will be urgently required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar". It is the Applicant's view (and this aligns with Government's view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p>
PCC-18	Energy Need Soils and Agriculture	Food Security	"The PCC are not sure how all this fits with the Government strategy on Food security as described by Department for Environment, Food and Rural Affairs (DEFRA) recently published Government Food Strategy. The following is taken from the introduction to the strategy: We are the Department for Environment, Food and Rural Affairs. We're responsible for improving and	Section 3.3 of <b>7.11 Statement of Need [APP-320]</b> describes Government's view that large capacities of low-carbon generation will be urgently required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar". It is the

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>protecting the environment, growing the green economy, sustaining thriving rural communities and supporting our world-class food, farming and fishing industries. We work closely with our 33 agencies and arm's length bodies on our ambition to make our air purer, our water cleaner, our land greener and our food more sustainable. Our mission is to restore and enhance the environment for the next generation, and to leave the environment in a better state than we found it. The massing of solar projects in the area is unlikely to "sustain thriving rural communities". Elsewhere in the strategy the importance of retaining agricultural land as part of the food strategy is stated: The conflict in Ukraine has shown us that domestic food production is a vital contributor to national resilience and food security. Domestic food production can reduce the offshoring of food production to countries that do not meet our high environmental and animal welfare standards. Not only does the Ukraine conflict bring into sharp relief the weakness of having dependence on relative few countries as major producers of a given food type, the strategy</p>	<p>Applicant's view (and this aligns with Government's view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p> <p>Section 7.6 [APP-320] demonstrates that large-scale solar is the most efficient use of land for energy generation purposes.</p> <p>The Defra UK Food Security report<sup>1</sup> notes that the main risks to UK food security include climate change and soil degradation. Land use change is not identified as a risk to UK food security. Development of a solar farm addresses climate change risks. In addition, the extended fallow of arable land reverted to grassland within the solar farm area enables a recovery of soil health that has been depleted through arable management. As noted in paragraph 19.9.14 of <b>6.2.19 Environmental Statement - Chapter 19 Soils and Agriculture [APP-057]</b>, the reversion of arable land to pasture below a solar farm is very effective at enabling recovery of soil organic matter, degraded by repeated cultivation.</p>

<sup>1</sup> UK Food Security Report 2021, Department for Environment Food & Rural Affairs



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			emphasises the need to avoid "offshoring" food production abroad."	
PCC-19	Energy Need Principle of Development (DCO) Soils and Agriculture Socio-economic, Tourism and Recreation	Consideration of Farming Circumstances along Cable Route	"The strategy also recognises the need to treat farmers fairly As the custodians of our natural environment and important contributors to our food security, farmers must be treated fairly. The concerns raised to us by residents would question whether local farmers are being treated fairly. The expediency of accessing the National Grid at the Cottam and West Burton seems to be the overriding consideration for the proposed projects."	Section 3.3 of <b>7.11 Statement of Need [APP-320]</b> describes Government's view that large capacities of low-carbon generation will be urgently required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar".  Section 8.5 of the Statement of Need describes and agrees with Government's view that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.  Paragraphs 3.3.17-18 <b>[APP-320]</b> explains Government's view that irradiance, site topography and proximity to suitable connection points to the transmission network, are likely to be key inputs to site selection. Section 7.5 of the Statement of Need describes the site selection process for large scale solar more fully, and Section 7.7 of the Statement of Need sets out how the design of the Proposed Development seeks to maximise utilisation of the existing available and contracted grid connection capacity available at the West Burton substation.

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>The land included in the Scheme covers 4 farm businesses, all of which are owner occupiers of the land within the Sites. Each of the land owners has signed up to an option agreement with the Applicant. This is detailed in full in para. 7.1.2 to 7.1.29 of <b>6.3.19.1 Environmental Statement - Appendix 19.1 Agricultural Land Quality, Soil Resources and Farming Circumstances Report [APP-137]</b>.</p> <p>Resultingly, the Scheme is anticipated to lead to a maximum loss of approximately 13 full-time equivalent agriculture jobs, as stated in paragraph 18.7.15 of document <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b>. The Scheme is estimated to employ 6 full-time equivalent employees from the local area during operation; see Table 18.16. The net change in employment in the local area (defined as West Lindsey and Bassetlaw Districts) during the Scheme's operational life is a loss of approximately 2 full-time jobs, once consideration of direct, indirect and induced employment, and impacts on the tourism and recreation industry are considered (see para. 18.7.81). Overall, the economic benefit to the local area is estimated to be £1.5 million per year (see para. 18.7.99).</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
PCC-20	Planning Policy Energy Need Alternatives and Design Evolution	Location of Development	"The oft quoted "levelling-up agenda" raises questions about whether there are similar such projects, in similar such concentrations being proposed elsewhere in the country, and thus to what extent this project is respectful of the aim to level-up across the country."	<p>Section 3.3 of <b>7.11 Statement of Need [APP-320]</b> describes Government's view that large capacities of low-carbon generation will be urgently required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar".</p> <p>Section 8.5 <b>[APP-320]</b> describes and agrees with Government's view that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p> <p>Paragraphs 3.3.17-18 <b>[APP-320]</b> explain Government's view that irradiance, site topography and proximity to suitable connection points to the transmission network, are likely to be key inputs to site selection. Section 7.5 describes the site selection process for large scale solar more fully, and Section 7.7 sets out how the design of the Proposed Development seeks to maximise utilisation of the existing available and contracted grid connection capacity available at the West Burton substation.</p>
PCC-21	Energy Need Climate Change Soils and Agriculture	Retention of Land for Food Production	"At the Glasgow COP26 conference the Government was keen to address issues in Climate Change. Global warming is happening, and recent record temperatures in the UK (UK record of 40.30C at Coningsby on 19th July 2022)	Section 5.3 of <b>7.11 Statement of Need [APP-320]</b> sets out the urgent need for decarbonisation of the electricity sector, indeed Paragraph 8.9.3 of the Statement of Need explains that in 2021, BEIS

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
	Alternatives and Design Evolution		are evidence of this. The consequence of this is altered weather patterns, and thus inevitably alterations in the food production abilities of countries around the world. It is therefore important to retain food productive land for this purpose in those more temperate countries as the probabilities of equatorial, and thus hotter, countries to maintain production becomes evermore at risk. Another feature of the altered weather patterns is that historic data on sunshine levels etc. is no guarantee for the future expectation. It is therefore unwise to over proliferate massive solar schemes in the West Lindsey District Council area."	<p>(now DESNZ) unveiled plans to decarbonise UK power system by 2035.</p> <p>The plans focus on building a secure, home-grown energy sector that reduces reliance on fossil fuels and exposure to volatile global wholesale energy prices and solar is part of that solution.</p> <p>Section 3.3 <b>[APP-320]</b> describes Government's view that large capacities of low-carbon generation will be urgently required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar". It is the Applicant's view (and this aligns with Government's view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p> <p>Section 7.6 <b>[APP-320]</b> demonstrates that large-scale solar is the most efficient use of land for energy generation purposes.</p> <p>. The most recent Defra report on UK wide food security issues <sup>2</sup>highlights that key risks to UK food security include climate change and soil</p>

<sup>2</sup> UK Food Security Report 2021, Department for Environment Food & Rural Affairs

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				degradation. Development of UK agricultural land is not identified as a risk.
PCC-22	Soils and Agriculture Alternatives and Design Evolution	ALC Grade Assessment Scope	"It is noted that there is an extension to the consultation deadline for West Burton 4 to 23rd August 2022 in respect to Agricultural Land Classification (ALC) arising from soil sampling revealed differences against the information used about ALC in the PEIR. It is therefore imperative that sufficient soil samples are taken across all land to be used within proposed projects to ensure that no Grade 1, Grade 2 or Grade 3a land is taken out of food production should these projects proceed."	All agricultural land within the Sites has been subject to a detailed Agricultural Land Classification (ALC) assessment in line with Natural England guidance given in their document TIN049. Please see <b>6.3.19.1 Environmental Statement - Appendix 19.1 Agricultural Land Quality, Soil Resources and Farming Circumstances Report [APP-137]</b> .
PCC-23	General (Consultation)	Consultation Process and Publication of Hard-Copy Materials	"St Mary's Church, Stow has been a hub for access to project materials during the consultation period Wednesday 15th June 2022 - Wednesday 27th July 2022, including copies of all paper based material except the lever arch files containing Appendices to support the PEIRs. There was no reason to believe that this was an oversight at the time, however today, Wednesday 27th July 2022 copies of all appendices were delivered to the church, together with the updated ALC data for the West Burton 4 site of the West Burton Solar project. To receive the appendices at such a late stage in the consultation process at a consultation hub (c.1.49km to NE of West Burton 3, and c.1.15km to W of Cottam 1) that is so close to the project	The Applicant notes that the Parochial Church Council of the Parish of Stow-with-Sturton hosted copies of the PEIR and other consultation materials of the Scheme and would like to thank them of this.  Chapter 8 of <b>5.1 Consultation Report [APP-022]</b> details that further soil sampling across the Scheme became available during the second phase of consultation and the results did report different proportions of BMV land for parts of the land within the West Burton 4 site. The Applicant considered this represented a material change to the interim ALC reports published as part of the PEIR regarding this part of the Scheme. The Applicant therefore acted to publicise this

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>sites could be construed as a deliberate attempt to disenfranchise consultees of relevant information. Not everyone has internet access or capacity to use "data sticks", neither of which are user friendly when trying to cross reference material."</p>	<p>updated information as an addendum to the PEIR and encouraged feedback on this through the Scheme communications channels and via an online form hosted on the Scheme website. The Applicant notes that consultees were invited to view and comment on this updated information between 25 July 2022 and 23 August 2022, in accordance with the Planning Act 2008 and associated guidance.</p> <p>The Applicant can confirm that 121 feedback responses were received during this extended consultation period. The feedback received, including the issues raised and how the Applicant has had regard to these in developing the Scheme, can be found in table 5.12.10 of <b>5.13 Consultation Report - Appendix 5.12 - Section 47 Applicant Response [APP-036]</b>.</p> <p>The Applicant notes that West Burton 4 was removed from the Scheme prior to the DCO application being made. West Burton 4 was removed from the Scheme to reduce the overall proportion of BMV land within the Scheme and took into account significant objection to the site from residents in Clayworth and Gringley-on-the-Hill, as well as concerns raised by Parish Councils in relation to landscape impact and BMV land. Removal of West Burton 4 significantly reduces the amount of BMV land within the Scheme from 42.3% to 26.24%. This is set out in further detail in</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<b>6.2.5 Environmental Statement Chapter 5 Alternatives and Design Evolution [APP-043].</b>

**Table 2.3.11: Applicant's Response to Saxilby Nature Project [RR-297]**

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
SNP-01	Site Description	Order Limits Location	"One of the Saxilby Nature Project's community nature sites is adjacent to a field on which solar panels are proposed."	The Applicant notes this comment.
SNP-02	Principle of Development  Ecology and Biodiversity  Socio-economics, Tourism and Recreation	Community Benefits	<p>"We have been in talks with Island Green Power who have offered the following:</p> <ol style="list-style-type: none"> <li>1. To sublet (for a nominal rent) to Saxilby Nature Project two and a half acres of land within the solar park (opposite Hardwick Scrub community nature site) to be set up by the Saxilby Nature Project as an outdoor classroom for children.</li> <li>2. To assist with set up costs of the outdoor classroom, including the installation of an accessible toilet, wooden shelter, and hard standing for use as a car park,</li> <li>3. To construct a dual-purpose track (pedestrian+bicycles) around part of the perimeter of the field opposite Hardwick Scrub, and to meet up with a farm track which is a designated public highway, leading onto Sykes Lane, which leads into nearby Saxilby.</li> </ol>	<p>The Applicant acknowledges discussions with Saxilby Nature Project have included these points and has included the agreed outcomes of the discussions as part of the DCO application.</p> <p>A total of 0.8ha of land has been proposed as a habitat management area (Work No.10 in Schedule 1 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>). This area has been designed to assure it aligns with the objectives of Saxilby Nature Project and their neighbouring Hardwick Scrub site (see para. 4.5.90 of <b>6.2.4 Environmental Statement - Chapter 4 Scheme Description [APP-042]</b>).</p> <p>Any financial contributions towards the use of this land by Saxilby Nature Project will be agreed outside the scope of the DCO through the Community Benefit Fund, as described in</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>4. To sublet (for a nominal rent) to Saxilby Nature Project approximately seven acres of land within the solar park adjacent to the B1241 Saxilby to Sturton-by-Stow road, straddling the Codder Lane Belt. This land to be converted into a wildflower meadow by Saxilby Nature Project, and to be linked to the dual-purpose track referred to earlier."</p>	<p>paragraph 4.8.1 of <b>7.5 Planning Statement [APP-313]</b>.</p> <p>The permissive path, as described in paragraph 3.9.5 of <b>7.6 Design and Access Statement [APP-314]</b>, is intended primarily as a footpath due to the anticipated users predominantly being on foot. It was therefore not considered necessary or suitable to provide a facility for horse-riders or cyclists. Furthermore, the permissive path does not connect to the wider bridleway network and thus would have limited use or benefit to cyclists or horse-riders. The wider bridleway network is identified within Appendix B of <b>6.3.14.3_A Environmental Statement - Appendix 14.3 Outline Public Rights of Way Management Plan Revision A [EN010132/EX1/WB6.3.14.3_A]</b>.</p> <p>The fields adjacent to the B1241 removed from panelled are proposed as successional scrub for landscape and ecological mitigation (as shown on <b>6.4.8.18.2 Environmental Statement - Figure 8.18.2 - Landscape and Ecology Mitigation and Enhancement Measures - West Burton 2 [EN010132/EX1/WB6.4.8.18.2_A]</b>) but are not intended to be sublet to Saxilby Nature Project.</p>

**Table 2.3.12: Applicant's Response to Saxilby Public Recreation Ground Charity [RR-298]**



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
SPRGC-01	General	Charity Funding Opportunities	"As a local charity, should the project go ahead we will be interested in any funding opportunities arising from it."	<p>The Applicant is committed to providing a Community Benefit Fund (see paragraph 4.8.1 of <b>7.5 Planning Statement [APP-313]</b>). This fund will be available for community-based benefits such as (but not limited to) community-led energy related projects. No further details were given as a part of the Application because it will not be taken into account in the planning balance.</p> <p>The Applicant has identified a potential mechanism for the distribution of the fund in the form of Lincolnshire and Nottinghamshire Community Foundations in order to ensure that the fund can be distributed across the Scheme's geographical extents, and have undertaken early stage discussions with them.</p>

**Table 2.3.13: Applicant's Response to Solar Campaign Alliance [RR-310]**

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
SCA-01	The Interested Party	Context of SCA's Representation	"The SCA is an alliance of over 80 community groups who have significant concerns about large-scale ground-mounted solar farms on greenfield land in their areas. The groups within the SCA represent both NSIPs and schemes that are seeking planning approval through local planning authorities."	The Applicant notes this comment.

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
SCA-02	Energy Need	Need for Solar PV Energy in the UK	"The SCA acknowledges the importance of renewable energy and accepts that solar PV (particularly roof top solar, car park solar, as well as use of other brownfield sites) has a part to play in supplying renewable energy."	<p>Section 3.3 of <b>7.11 Statement of Need [APP-320]</b> describes Government's view that large capacities of low-carbon generation will be urgently required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar".</p> <p>Section 7.6 <b>[APP-320]</b> analyses the potential contribution of "brownfield" solar sites to the national need for solar generation. Brownfield sites, including rooftop and other community energy systems, are likely to grow in the UK and will make a contribution to decarbonisation of the UK energy system. However, the Statement of Need concludes that on their own, brownfield developments are unlikely to be able to meet the national need for solar. Section 8.5 of the Statement of Need describes and agrees with Government's view that decentralised and community energy systems are unlikely to lead to the significant replacement of large-scale infrastructure. It is the Applicant's view (and this aligns with Government's view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p>
SCA-03	Energy Need	Location of Solar PV Development	"However, the SCA is against inappropriate development on greenfield land across the UK	Section 3.3 of <b>7.11 Statement of Need [APP-320]</b> describes Government's view that large capacities

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
	Planning Policy Soils and Agriculture	on Agricultural Land	<p>(and particularly highly productive farmland) and is deeply concerned about the number and scale of such developments across the UK and the cumulative impact this is having. The Alliance also notes the recent Energy Security Strategy statement on solar which states that the government would encourage large-scale projects to be located on previously developed or lower value land."</p>	<p>of low-carbon generation will be urgently required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar".</p> <p>Section 7.6 <b>[APP-320]</b> analyses the potential contribution of "brownfield" solar sites to the national need for solar generation. Brownfield sites, including rooftop and other community energy systems, are likely to grow in the UK and will make a contribution to decarbonisation of the UK energy system. However, the Statement of Need concludes that on their own, brownfield developments are unlikely to be able to meet the national need for solar. Section 8.5 of the Statement of Need describes and agrees with Government's view that decentralised and community energy systems are unlikely to lead to the significant replacement of large-scale infrastructure. It is the Applicant's view (and this aligns with Government's view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p> <p>Section 7 of <b>7.5 Planning Statement [APP-313]</b> concludes with a consideration of the Planning Balance and justifies how the overwhelming national need, as demonstrated in the Statement</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				of Need, outweighs any potential significant adverse impacts which, as the <b>Environmental Statement [APP-039 to APP-061]</b> sets out, are limited, and will be considered by the Secretary of State in making a decision on the application.
SCA-04	General	Registration of Objection to Scheme	"The SCA would like to register our objection to the West Burton solar proposals..."	The Applicant notes this comment and has addressed specific points of objection from the Solar Campaign Alliance in the responses to comments/issues SCA-05 to SCA-12 below.
SCA-05	Planning Policy Alternatives and Design Evolution	Compliance with National Policy	"The scheme does not comply with NPPF which stipulates that valuable farmland should be avoided. The land at the proposed West Burton site sustains a range of high yielding arable crops."	With regard to the best and most versatile agricultural land, Paragraph 174 of the NPPF states that "Planning policies and decisions should contribute to and enhance the natural and local environment by: ... b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland" The proposed solar farm will be decommissioned at the end of its operational life and will not cause the loss or degradation of the agricultural land resource within the site. As per Paragraph 19.4.4 of <b>6.2.19 Environmental Statement - Chapter 19 Soils and Agriculture [APP-057]</b> the scope of the assessment meets the direction given by the NPPF and paragraph 5.10.8 of the NPS EN-1 which states that applicants should seek to minimise impacts on best and most versatile

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				agricultural land and preferably use land in areas of poorer quality. The site selection process has taken account of these policies and sought to minimise the impacts on best and most versatile agricultural land within the Scheme.
SCA-06	Planning Policy Soils and Agriculture	UK Food Security	"The UK is currently importing a large proportion of its food, and restricted supply and food rationing is becoming more prevalent across the UK. Food security must be considered when looking at planning proposals that include such vast areas of highly productive farmland."	Defra reporting on UK food security demonstrates that trends on self sufficiency in UK food production are stable.  The NPPF does not include food security as a criteria for assessing planning proposals.  We are not aware of food rationing in the UK.
SCA-07	Principle of Development Soils and Agriculture	Definition of Temporary Impacts	"We do not believe that the impacts can be considered "temporary." Indeed, the loss of agricultural land could be lost indefinitely should the scheme be granted, and then 're-energised' once its term has ended."	A large proportion of the agricultural land within the solar farm development can be retained in agricultural use during the operational phase of the Scheme for uses such as grazing sheep, as stated in paragraph 19.3.3 of <b>6.2.19 Environmental Statement - Chapter 19 Soils and Agriculture [APP-057]</b> . The agricultural land resource being used for the Scheme is not lost permanently as set out in paragraph 19.9.3 of <b>6.2.19 Environmental Statement Chapter 19 Soils and Agriculture [APP-057]</b>
SCA-08	Alternatives and Design Evolution	Site Selection Process and Landscape Mitigation	"We have concerns about the site selection process and the significant impact that this scheme would have on the local landscape and on those who enjoy this landscape. This includes	Further information on the design and scheme development process is provided within <b>6.2.5 Environmental Statement - Chapter 5 Alternatives and Design Evolution [APP-043]</b> . This sets out the step-by-step site selection

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
	Landscape and Visual Impact		the inadequacy of the suggested mitigation measures."	<p>process which the Applicant has followed and which confirms the location of the Scheme is suitable for a large-scale solar farm. This has included the avoidance of sensitive landscape and environmental designations in confirming the site suitability and consideration of alternative sites (para. 5.2.7).</p> <p><b>6.2.8 Environmental Statement Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> provides a full assessment on the landscape and visual effects of the Scheme.</p> <p>There is a requirement to avoid significant harm and development within nationally designated landscapes as set out in section 5.9 of NPS EN1.</p> <p>Paragraph 5.2.7 of <b>6.2.5 Environmental Statement Chapter 5 Alternatives and Design Evolution [APP-043]</b> sets out that  <i>"Notwithstanding this, the Scheme has considered these factors and is not considered to give rise to any impacts in respect of the Habitats Directive, nor is it situated within a national landscape designation"</i>.</p> <p>Mitigation, including offsets and planting, is proposed to address and minimise adverse effects on the character and visual amenity of the local landscape. This is in line with the agreed methodology and the hierarchy of approach advocated by the Guidelines for Landscape and</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				Visual Impact Assessment, 3rd Edition and was agreed with Lincolnshire County Council and Nottinghamshire County Council at the series of workshops, as set out in <b>6.3.8.4 Environmental Statement - Appendix 8.4 Consultation [APP-075]</b> .
SCA-09	Noise and Vibration Landscape and Visual Impact Other Environmental Matters (Human Health)	Noise and Visual Impacts on Mental Health and Wellbeing	"We also have questions about noise impacts and the effect of visual and noise impacts on people's mental health and well-being."	The likely impacts of noise and vibration, including any anticipated impacts to residential properties, have been assessed in Section 15.7 of <b>6.2.15 Environmental Statement - Chapter 15 Noise and Vibration [APP-056]</b> . The noise and vibration effects are not anticipated to be significant (see paragraphs 15.11.3)  <b>6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact [APP-046]</b> (the 'LVIA') includes a full and detailed assessment that deals with both effects on the landscape itself and effects on the visual amenity of people, as well as the interrelationships of these with other related topics in the ES such as noise and health and well-being. The LVIA process is iterative and as a result, the design of the Scheme has changed to respond to the findings of the assessment and other related topics to ensure that landscape mitigation is fully considered as part of the process and incorporated into the design of the Scheme.

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>As noise impacts have not been assessed to be significant, these are not anticipated to have an adverse impact on mental health and wellbeing. Direct impacts to human health and wellbeing from visual impacts are not anticipated and therefore not assessed. The Applicant refers the Interested Party to Section 21.5 of <b>6.2.21 Environmental Statement - Chapter 21 Other Environmental Matters [APP-059]</b>.</p> <p>That notwithstanding, the Applicant is cognisant of the significance of the countryside for physical and mental wellbeing and, as such, likely impacts on the desirability and use of recreational facilities in the countryside, such as public rights of way, have been assessed in Section 18.7 of <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b>. The greatest level of effect to access, desirability and use of recreational facilities is limited to short- to medium-term moderate adverse effects on long distance recreational routes (the Trent Valley Way and National Byways) during construction (see Table 18.15 and para. 18.7.62). This is a <b>significant adverse</b> effect. This is however the only significant effect anticipated, with no greater than moderate-minor adverse anticipated to any other recreational receptor during construction (see paras. 18.7.60 to 18.7.69), or to any recreational receptor during</p>



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>operation (see paras. 18.7.107 to 18.7.117) and decommissioning (see paras. 18.7.147 to 18.7.157). These effects are not anticipated to be significant.</p> <p>This is re-iterated in Section 21.5 of <b>6.2.21 Environmental Statement - Chapter 21 Other Environmental Matters [APP-059]</b>.</p>
SCA-10	Ecology and Biodiversity	Assessment Methodology	"The SCA also has significant concerns about the biodiversity claims and assessments and the long-term impacts this may have."	<p><b>6.2.9 Chapter 9 of the Environmental Statement [APP-047]</b> sets out the extensive findings of all ecological investigations undertaken within the Order Limits together with an appraisal of the relative importance of each species or species group, habitat or designated site. This survey scope has been formulated through consultation with Natural England as well as Lincolnshire and Nottinghamshire Wildlife Trusts and has deemed to be thorough and appropriate.</p> <p>A comprehensive package of mitigation has been provided, in tandem with embedded mitigation which is secured through the ecologically sensitive design of the Scheme (including measures such as the wide buffering of all field boundaries and the use of existing hedgerow gaps for accesses).</p> <p>These measures are further detailed within <b>7.17 Outline Ecological Protection and Mitigation Strategy [APP-326]</b> (as secured by Requirement 8</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> and <b>7.3_A Outline Landscape and Ecological Management Plan Revision A [EN010132/EX1/WB7.3_A]</b> (as secured by Requirement 7 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>) which will ensure that all identified impacts are avoided or minimised as far as possible.</p> <p>In many cases, the reversion from intensive agriculture to pasture or meadow grassland with additional hedgerow, scrub, tree and wetland habitat creation will bring about positive effects for wildlife. In particular, terrestrial and aquatic invertebrates, botanical diversity, small mammals and many species of bird all stand to benefit.</p> <p>In this way, a substantive net gain for biodiversity will be achieved (see <b>6.3.9.12 Environmental Statement - Appendix 9.12 Biodiversity Net Gain Report [APP-088]</b>), predominantly through the creation of extensive low-input grassland resulting in a net gain of 86.80% in habitat units, but also several new ponds and wetland habitat parcels resulting in a net gain of 33.25% in river units, and the planting of several kilometres of species-rich hedgerow resulting in a net gain of 54.71% in hedgerow units.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>This is secured through Requirement 9 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>, which states that “No part of the authorised development may commence until a biodiversity net gain strategy has been submitted to and approved by the relevant planning authority, in consultation with the relevant statutory nature conservation body.”</p>
SCA-11	Transport and Access	Assessment Methodology	<p>“We also consider that traffic and transport impacts have not been adequately addressed.”</p>	<p>An Outline Construction Traffic Management Plan (CTMP) has been prepared to support the application within <b>6.3.14.2_A Environmental Statement - Appendix 14.2 Construction Traffic Management Plan Revision A [EN010132/EX1/WB6.3.14.2_A]</b>.</p> <p>The outline CTMP submitted as part of the DCO application provides a framework for the management of construction vehicle movements to and from the Scheme, to ensure that the effects of the temporary construction phase on the local highway network are minimised and made acceptable. <b>6.3.14.2_A Environmental Statement - Appendix 14.2 Construction Traffic Management Plan Revision A [EN010132/EX1/WB6.3.14.2_A]</b> covers:</p> <ul style="list-style-type: none"> <li>Construction methodology;</li> <li>Site access;</li> </ul>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>Construction vehicle trip generation; Construction vehicle routing; Abnormal load movement; and Mitigation and management measures.</p> <p>The Transport Assessment within <b>6.3.14.1_A Environmental Statement - Appendix 14.1 Transport Assessment Revision A [EN010132/EX1/WB6.3.14.1_A]</b> provides an assessment of the transport effects of the Scheme and concludes, through paragraphs 11.1 to 11.11, that the Scheme is acceptable from the perspective of transport effects.</p>
SCA-12	General (Procedural)	Cumulative Assessment of Effects	"We note that West Burton is one of 4 proposals in the West Lindsey area and these should be considered together. The size of these 4 proposals together is ca. 10,000 acres (an area approximately the size of Lincoln city)."	<p>The Applicant notes this comment and seeks to assure the Interested Party that a cumulative effects assessment has been prepared for the Application within the <b>Environmental Statement [APP-039 to APP-061]</b>.</p> <p>Cumulative effects assessments for each environmental topic are set out in each of the ES Chapters and include the assessment of the impacts of the Scheme cumulatively with the Gate Burton Energy Park, Cottam Solar Project and Tillbridge Solar Project (see paragraph 2.5.9 of <b>6.2.2 Environmental Statement - Chapter 2 EIA Process and Methodology [APP-040]</b>).</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				This assessment has been carried out in accordance with Schedule 4 of the 2017 EIA Regulations and PINS Advice Note 17. The mitigation measures set out across the ES therefore account for anticipated cumulative effects.

**Table 2.3.14: Applicant's Response to Sturton and Stow Neighbourhood Planning Group [RR-321]**

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
SSNPG-01	Soils and Agriculture	Cumulative Impacts on Agricultural Land	"This project along is one of four currently being progressed; Cottam, Gate Burton, West Burton and Tillbridge Solar. Collectively these projects will cover approximately 10,000 ACRES of good farm land."	Agricultural land is not lost to a solar farm development as it will be decommissioned. Land within the proposed developments can continue in agricultural production throughout the operational periods, grazing sheep as noted in paragraph 19.3.3 of <b>6.2.19 Environmental Statement - Chapter 19 Soils and Agriculture [APP-057]</b> .
SSNPG-02	Principle of Development (DCO)	Draft DCO	"If the DCO is along the same lines as Cottam then this will no longer be a collaboration."	The Applicant notes this comment. The draft DCO for this Scheme is similarly drafted to the Cottam draft DCO, as well as other solar DCOs in the local area. This approach is being adopted so there is consistency across the schemes for the benefit of the other parties involved (for example, the local authorities responsible for discharging the requirements in Schedule 2 to the <b>dDCO [EN010132/EX1/WB3.1_A]</b> ).

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
SSNPG-03	Principle of Development (DCO)	Use of Compulsory Acquisition Powers	"Compulsory purchase of all land and cable routes."	<p><b>6.3.5.1_A Environmental Statement - Appendix 5.1 Site Selection Assessment Revision A [AS-004]</b> confirms that as part of the site selection process, identification of willing landowners was a consideration, along with consideration of environmental constraints and other factors. As a result, those landowners willing to accommodate large scale solar have agreed land options for the Sites.</p> <p><b>4.1 Statement of Reasons: Compulsory Acquisition Information [APP-019]</b> sets out the case for why the powers sought over land are necessary and proportionate to deliver the Scheme. Wherever possible, the Applicant is seeking to enter voluntary agreements with landowners and only where this is not possible will powers of compulsory acquisition be exercised.</p>
SSNPG-04	Principle of Development (DCO) Landscape and Visual Impact Ecology and Biodiversity	Draft DCO Powers to Remove Hedgerows and Trees	"The right to destroy any and all hedgerows and trees irrespective of TPO'S."	<p>[</p> <p>As set out in the <b>7.1_A Outline Construction Environmental Management Plan Revision A [EN010132/EX1/WB7.1_A]</b> in Table 3.3 wherever feasible, construction vehicle access to the Scheme's Sites will utilise existing access points. In certain instances, minor vegetation removal may be necessary to accommodate the vehicle's swept path and ensure visibility. In relation to</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>abnormal loads, there is no vegetation removal required, only minor pruning.</p> <p>In certain locations where existing accesses do not exist, some very minor hedgerow removal is necessary to accommodate the access road between fields, land parcels and solar panel areas. This removal is set out in <b>Hedgerow Removal Plans [EN010132/EX1/WB7.3_A]</b>. This removal will involve only very short sections of hedgerow to accommodate internal access roads and will not involve loss of trees, in particular trees protected under any Tree Preservation Orders (TPOs).</p> <p>Where these minor areas of hedgerow removal are not being taken forward as an operational access, vegetation can be reinstated once construction is complete as set out in the <b>7.1_A Outline Construction Environmental Management Plan Revision A [EN010132/EX1/WB7.1_A]</b> in Table 3.3.</p> <p>Details of planting mitigation can be found within <b>6.4.8.18.1-3 Environmental Statement - Figures 8.18.1-3 - Landscape and Ecology Mitigation and Enhancement Measures [WB6.4.8.18.1_A to WB6.4.8.18.3_A]</b> that illustrate the existing vegetation and key areas of mitigation proposed as part of the Scheme. The Applicant and its LVIA consultants at Lanpro have worked closely with</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				the ecology consultant throughout the application process to inform the LVIA and associated mitigation plans. This is secured in Schedule 2 by Requirement 7 of the dDCO through the approval of a Landscape and Ecological Management Plan <b>[EN010132/EX1/WB3.1_A].</b>
SSNPG-05	Principle of Development (DCO) Transport and Access Socio-economics, Tourism and Recreation	Impacts on ProWs	"Stoppage of any footpath."	Public Rights of Way may be subject to short-term temporary diversions or closures to facilitate cable laying as set out in para 3.13 of <b>6.3.14.3_A Environmental Statement - Appendix 14.3 Outline Public Rights of Way Management Plan Revision A [EN010132/EX1/WB6.3.14.3_A].</b> All Public Rights of Way on and surrounding the Sites are to remain open during construction where feasible, and all existing Public Rights of Way are to be retained during the Scheme's operational lifetime.  A Public Rights of Way Management Plan that is substantially in accordance with the outline PRowMP <b>[EN010132/EX1/WB6.3.14.3_A]</b> will be implemented during the construction phase of the Scheme. This will be submitted and approved prior to the commencement of construction of the Scheme, as secured through Requirement 18 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A].</b>



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>Likely impacts on the desirability and use of recreational facilities in the countryside, such as public rights of way, have been assessed in Section 18.7 of <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b>. The greatest level of effect to access, desirability and use of recreational facilities is limited to short- to medium-term moderate adverse effects on long distance recreational routes (the Trent Valley Way and National Byways) during construction (see Table 18.15 and para. 18.7.62). This is a <b>significant adverse</b> effect. This is however the only significant effect anticipated, with no greater than moderate-minor adverse anticipated to any other recreational receptor during construction (see paras. 18.7.60 to 18.7.69), or to any recreational receptor during operation (see paras. 18.7.107 to 18.7.117) and decommissioning (see paras. 18.7.147 to 18.7.157). These effects are not anticipated to be significant.</p>
SSNPG-06	Principle of Development (DCO)  Transport and Access	Impacts on Public Highway	"Closing or rerouting of any roadway."	<p>There is no intention to close or reroute any roadway as part of the construction of the Scheme, except for short periods when abnormal loads are delivered to the Sites. This information is set out in the Outline Construction Traffic Management Plan (CTMP) within <b>6.3.14.2_A Environmental Statement - Appendix 14.2 Construction Traffic Management Plan</b></p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<b>Revision A [EN010132/EX1/WB6.3.14.2_A]</b> . This is secured in Schedule 2 by Requirement 15 of the dDCO through the approval of a Construction Traffic Management Plan <b>[EN010132/EX1/WB3.1_A]</b> .
SSNPG-07	Principle of Development (DCO) Transport and Access	Use of Green Lanes/ Unmetalled Highways	"Turning green lanes into metalled highways."	There is no intention to turn green lanes into metalled highways as part of the Scheme. The construction vehicle access proposals are set out in the Transport Assessment within <b>6.3.14.1_A Environmental Statement - Appendix 14.1 Transport Assessment Revision A [EN010132/EX1/WB6.3.14.1_A]</b>
SSNPG-08	Landscape and Visual Impact Socio-economics, Tourism and Recreation	Impact on Views of and Recreational Use of the Countryside	"Complete disregard of the residents views and ability to use the areas for recreation which have been enjoyed for many years."	<b>6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> (the 'LVIA') includes a full and detailed assessment that deals with both effects on the landscape itself and effects on the visual amenity of people, as well as interrelationships of these with other related topics in the ES. The LVIA process is iterative and as a result, the design of the Scheme has changed to respond to the findings of the assessment to ensure that landscape mitigation is fully incorporated into the Scheme.  For example, the LVIA mitigation has had regard to the need to consider the landscape character and visual amenity for the users of ProWs. This is set out in <b>6.3.8.3 Environmental Statement</b>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p><b>Appendix 8.3 Assessment of Potential Visual Effects [APP-074].</b> Public Rights of Way Receptor PR006 (Brox/198/1) on pp.907-909 <b>[APP-074]</b> shows in this instance that the Embedded Mitigation would include panels set a minimum of 15m from the adjacent ProW. Native hedgerows within and on the boundaries of the WB1 Site will be retained and reinforced with new native trees, as secondary mitigation. Hedgerows would also be maintained at a taller height (c5m). The landscape proposals include provision for a new native woodland shelterbelt and scattered trees along the southern boundary of the WB1 Site. Once established, these measures, combined with the additional tree planting across the Site, would help break up the of the array, substation and associated infrastructure. During the spring and summer, when the vegetation is out in leaf, the hedgerows and trees would soften and filter views. Available views would be limited to transient views through gate entrances and over low hedgerows.</p> <p>In addition to the enhancement and retention of native hedgerows, other mitigation includes native shelter belts and woodland planting within the wider WB1 Site. These mitigation measures will help improve the landscape fabric. Newly planted trees and joined up intact hedgerows in</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>the landscape would also help break up the flat arable fields.</p> <p>The Applicant is cognisant of the significance of the countryside for physical and mental wellbeing and, as such, likely impacts on the desirability and use of recreational facilities in the countryside, such as public rights of way, have been assessed in Section 18.7 of <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b>. The greatest level of effect to access, desirability and use of recreational facilities is limited to short- to medium-term moderate adverse effects on long distance recreational routes (the Trent Valley Way and National Byways) during construction (see Table 18.15 and para. 18.7.62). This is a <b>significant adverse</b> effect. This is however the only significant effect anticipated, with no greater than moderate-minor adverse anticipated to any other recreational receptor during construction (see paras. 18.7.60 to 18.7.69), or to any recreational receptor during operation (see paras. 18.7.107 to 18.7.117) and decommissioning (see paras. 18.7.147 to 18.7.157). These effects are not anticipated to be significant.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				This is re-iterated in Section 21.5 of <b>6.2.21 Environmental Statement - Chapter 21 Other Environmental Matters [APP-059]</b> .
SSNPG-09	Principle of Development	Community Benefit or Compensatory Funding	"There has been no consultation from any of the solar companies with parishes regarding the setting up of any fund which would run for the entirety of the project to award sums for compensation for detrimental loss."	<p>Whilst not a part of the DCO Application, paragraph 4.8.1 of <b>7.5 Planning Statement [APP-313]</b> explains that the Applicant is committed to providing a Community Benefit Fund.</p> <p>The use of this fund would be limited to providing funds towards community based projects or facilities, and would not be eligible for use as compensation for personal losses. The Applicant has been liaising directly with landowners, or those with land interests directly affected by the Scheme throughout the DCO application process and they will continue to be contacted to ensure terms of agreement are reached. Furthermore, any losses incurred by owners of land or interests in land as a result of compulsory acquisition for the Scheme may be subject to compensation, as set out in Section 1.11 of <b>4.1 Statement of Reasons [APP-019]</b>.</p>
SSNPG-10	Soils and Agriculture Energy Need	Use of Agricultural Land	"The land is used for agricultural purposes."	Section 3.3 of <b>7.11 Statement of Need [APP-320]</b> describes Government's view that large capacities of low-carbon generation will be urgently required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
	Alternatives and Design Evolution			<p>system in 2050 is likely to be composed predominantly of wind and solar". It is the Applicant's view (and this aligns with Government's view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p> <p>Section 7.6 [APP-320] demonstrates that large-scale solar is the most efficient use of land for energy generation purposes.</p> <p>Agricultural land resource is not lost to or degraded by a solar farm development as it will be decommissioned. The land can also remain in agricultural production through the operational life of the solar farm, and can be used for agricultural purposes such as fattening sheep, as set out in paragraph 19.3.3 of <b>6.2.19 Environmental Statement – Chapter 19 Soils and Agriculture [APP-057]</b>.</p>

**Table 2.3.15: Applicant's Response to The British Horse Society [RR-331]**

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
TBHS-01	The Representation	Context of TBHS's Representation	"The British Horse Society is the UK's largest equestrian Charity, representing the UK's 3 million horse riders."	The Applicant notes this comment.

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
TBHS-02	Transport and Access  Socio-economics, Tourism and Recreation	Size and Safety of Equestrian Network	"Nationally equestrians have just 22% of the rights of way network and are increasingly forced to use busy roads to access them. In Lincolnshire the incidents on highways reported to the BHS rose from 61 in 2021 to 78 in 2022. This illustrates the importance of protecting, improving and extending safe off-road provision to help to prevent these numbers from increasing in the future."	<p>The Applicant is cognisant of the significance of the Public Rights of Way network for recreational activity, including equestrian uses, and its importance to physical and mental wellbeing. The likely nature and significance of effect of the Scheme on the recreational use of public rights of way for all users has been assessed in Section 18.7 of <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b>. The greatest level of effect to the use of bridleways and byways is assessed to be moderate-minor adverse and is anticipated during construction (see Table 18.15) and decommissioning (see paras. 18.7.143 to 18.7.149).</p> <p>Public Rights of Way may be subject to short-term temporary diversions or closures to facilitate cable laying as set out in para 3.13 of <b>6.3.14.3_A Environmental Statement - Appendix 14.3 Outline Public Rights of Way Management Plan Revision A [EN010132/EX1/WB6.3.14.3_A]</b>. All Public Rights of Way on and surrounding the Sites are to remain open during construction where feasible, and all existing Public Rights of Way are to be retained during the Scheme's operational lifetime.</p> <p>A Public Rights of Way Management Plan that is substantially in accordance with the outline PRoWMP <b>[EN010132/EX1/WB6.3.14.3_A]</b> will be</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				implemented during the construction phase of the Scheme. This will be submitted and approved prior to the commencement of construction of the Scheme, as secured through Requirement 18 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> .
TBHS-03	Planning Policy  Socio-economics, Tourism and Recreation	NPPF	"New development plans present threats and opportunities for all vulnerable road users: equestrians, cyclists, pedestrians, wheelchair users and mobility scooter users. The NPPF para 100 states: Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks."	<p>The Scheme includes measures to protect existing Public Rights of Way through <b>6.3.14.3_A Environmental Statement - Appendix 14.3 Outline Public Rights of Way Management Plan Revision A [EN010132/EX1/WB6.3.14.3_A]</b>, as secured through Requirement 18 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>. The Scheme also seeks to enhance the existing network through the provision of a new permissive path defined as Work No. 11 in Schedule 1 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p> <p>A policy assessment of the measures regarding existing Public Rights of Way and the proposed permissive path can be found in paragraphs 6.13.28 to 6.13.30, 6.15.16, 6.16.11 and in Appendix 4 of <b>7.5 Planning Statement [APP-313]</b>.</p>



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				The assessed moderate-minor benefit to recreational use of Public Rights of Way as a result of the proposed permissive path is set out in paragraph 18.7.110 of <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b> .
TBHS-04	General (Consultation)	Previous Comments not Addressed	"The British Horse Society's comments submitted in 2022 do not appear to have been acknowledged or addressed in the documents available in the pre-examination stage."	The Applicant notes that the British Horse Society took part in our consultation for the Scheme and would like to thank them for this. The comments submitted by the British Horse Society, including the issues raised and how the Applicant has had regard to these in developing the Scheme, can be found in Table 5.12.11 of <b>5.12 Consultation Report - Appendix 5.12 - Section 47 Applicant Response [APP-036]</b> .
TBHS-05	General	Quality of PRoW Plan	"The legend of annotated plans such as the Public Rights of Way Plan makes it difficult to distinguish between PRoW and PRoW to be stopped up temporarily. This was raised with the applicant previously."	The Applicant considers that the British Horse Society is making reference to Figure 2.1 of the <b>6.3.14.3_A Environmental Statement - Appendix 14.3 Outline Public Rights of Way Management Plan Revision A [EN010132/EX1/WB6.3.14.3_A]</b> which provides a high-level overview of the PRoW network across a wide area. A high resolution set of plans is included in Appendices A and B of the same document.
TBHS-06	General	Accessibility of Location Plan	"Location Plan does not load."	<b>6.4.1.1 Environmental Statement - Figure 1.1 - Location Plan [APP-139]</b> has been submitted to PINS as part of the DCO Application and is available on the PINS website. Please contact

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				PINS if there are any issues downloading the document.
TBHS-07	Alternatives and Design Evolution Transport and Access	Bridleway & Byway Network	"Why is the permissive path described as 'footpath' rather than a multi-user route? The bridleway and byway network in this area is fragmented (with more provision in the Nottinghamshire side than the Lincolnshire side), therefore leaving limited access for equestrians unless they ride/lead/carriage drive on the main roads to reach the safety of off-road provision."	The permissive path, as described in paragraph 3.9.5 of <b>7.6 Design and Access Statement [APP-314]</b> , is intended primarily as a footpath due to the anticipated users predominantly being on foot, and as a result of continuing agricultural requirements in the fields bounded by the proposed path. It was therefore not considered necessary or suitable to provide a facility for horse-riders or cyclists. Furthermore, the permissive path does not connect to the wider bridleway network. The wider bridleway network is identified within Appendix B of <b>6.3.14.3_A Environmental Statement - Appendix 14.3 Outline Public Rights of Way Management Plan Revision A [EN010132/EX1/WB6.3.14.3_A]</b> . Therefore, there is unlikely to be a significant demand from equestrian users.
TBHS-08	Alternatives and Design Evolution Socio-economics, Tourism and Recreation	Community Benefits of the Scheme	"Despite acknowledgement that consultation feedback to the EIA requested permissive routes to be bridleways to include all vulnerable road users - equestrians, cyclists, pedestrians, wheelchair users and mobility scooter users rather than only pedestrians. The Consultation Report response is recorded as still limiting the route to walkers and cyclists. Additionally, the permissive route represented a very limited offer considering the size and scale of the	In Table 1.1 of <b>5.1 Consultation Report [APP-022]</b> on p12, it is stated that: 'The Applicant has introduced a permissive footpath across the West Burton 2 site area, increasing recreational connectivity north of Saxilby. This will contribute to the wider network of footpaths in the area and facilitate greater public access to the countryside.'  The permissive path, as described in paragraph 7.6.1 of <b>7.6 Design and Access Statement [APP-</b>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			development; ways to include equestrians rather than excluding them should be the starting point otherwise the 'community benefit' does not benefit the whole community."	<b>314]</b> , is intended primarily as a footpath due to the anticipated users predominantly being on foot. It was therefore not considered necessary or suitable to provide a facility for horse-riders or cyclists. Furthermore, the permissive path does not connect to the wider bridleway network. The wider bridleway network is identified within Appendix B of <b>6.3.14.3_A Environmental Statement - Appendix 14.3 Outline Public Rights of Way Management Plan Revision A [EN010132/EX1/WB6.3.14.3_A]</b> . Therefore, there is unlikely to be a significant demand from equestrian users.
TBHS-09	Transport and Access	Construction HGV Traffic	"How would risks on the highway during the construction period be managed? The construction period for a development of this scale is considerable – 520 days of HGV movements proposed. HGV return journeys at the height of the construction period will impact on the volume of traffic on the road network locally. Already mainly 60mph roads with some sections of 30mph and 50mph, the additional traffic will make the highways higher risk for vulnerable road users in the absence of speed restrictions or other traffic calming measures."	An Outline Construction Traffic Management Plan (CTMP) has been prepared to support the application within <b>6.3.14.2_A Environmental Statement - Appendix 14.2 Construction Traffic Management Plan Revision A [EN010132/EX1/WB6.3.14.2_A]</b> .  The outline CTMP submitted as part of the DCO application provides a framework for the management of construction vehicle movements to and from the Scheme, to ensure that the effects of the temporary construction phase on the local highway network are minimised and made acceptable. <b>6.3.14.2 Outline Construction Traffic Management Plan [EN01032/EX1/WB6.3.14.2_A]</b> covers:

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>Construction methodology; Site access; Construction vehicle trip generation; Construction vehicle routing; Abnormal load movement; and Mitigation and management measures.</p> <p><b>6.3.14.1_A Environmental Statement - Appendix 14.1 Transport Assessment Revision A [EN010132/EX1/WB6.3.14.1_A]</b> provides an assessment of the transport effects of the Scheme and concludes, through paragraphs 11.1 to 11.11, that the Scheme is acceptable from the perspective of transport effects.</p>
TBHS-10	Transport and Access	Construction Worker Traffic	<p>"Shuttle buses for workers is environmentally sound and reduces volume of traffic although does increase the number of large vehicles on the country lanes. It is positive that the operation hours for construction are limited to avoid evenings although Saturday mornings would coincide with times that equestrians would be active on the lanes and PRoW. It is also positive that banksmen will be used for the access points for HGV's."</p>	<p>The Applicant notes this comment.</p>
TBHS-11	Transport and Access	Abnormal Indivisible Loads	<p>"Any abnormal loads which may be transported would also be notified in advance to allow</p>	<p>The Applicant confirms that the final CTMP will include provision for providing forewarning to any interested parties which is secured in</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			equestrians to choose to avoid the area on that day."	Schedule 2 by Requirement 15 of the dDCO[EN010132/EX1/WB3.1_A]..
TBHS-12	Transport and Access	Construction HGV Traffic and Highway Safety	"HGV's are generally 2.5m wide and 4.5m high (some vehicles for component transportation significantly larger) which, on the road network local to the site, would sandwich a horse and rider between the vehicle and the hedgerow or ditch along the route with little room for refuge which may cause panic. Appropriate information/training should be provided to drivers/ development workers to give priority to users of the PRow and country lanes."	All HGV drivers will have the appropriate licences and accreditations for the transportation of equipment to the Sites. This is secured in Schedule 2 by Requirement 15 of the dDCO through the approval of a Construction Traffic Management Plan [EN010132/EX1/WB3.1_A].  An Outline Construction Traffic Management Plan (CTMP) has been prepared to support the application within <b>6.3.14.2 A Environmental Statement - Appendix 14.2 Construction Traffic Management Plan Revision A [EN010132/EX1/WB6.3.14.2_A]</b> . The measures therein will be shared with all suppliers so that drivers are aware of the construction vehicle routes and management measures that will be in place.
TBHS-13	Transport and Access	Construction Signage	"The additional signage during construction to warn traffic of equestrians and other vulnerable road users in the area, and ensure they are considerate in terms of vehicles stopping if necessary and allowing vulnerable road users users to pass safely, as suggested by the BHS in July 2022, is welcomed."	The Applicant notes this comment.

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
TBHS-14	Transport and Access	Fear and Intimidation to Road Users	"The 'Pedestrian Amenity' (Chapter 14 Transport and Access) re access and delay has been amended to include cyclists but not equestrians – why have this group been excluded when horses/riders/carriage drivers, more often travelling alone or in pairs or threes, can also be subject to fear and intimidation from MPV traffic?"	<p>It is acknowledged that horse riders may use the local highway network and bridleways operate close to, or through the Scheme. An addendum will be prepared to <b>6.2.14 Environmental Statement - Chapter 14 Transport and Access [APP-052]</b> and will be submitted at Deadline 1 to include equestrians.</p> <p>The number of construction vehicle movements predicted on the local road network is set out in Section 6 of the <b>6.3.14.1_A Environmental Statement - Appendix 14.1 Transport Assessment Revision A [EN010132/EX1/WB6.3.14.1_A]</b>. Traffic mitigation and management measures are set out in Section 7 of <b>6.3.14.2 Environmental Statement - Appendix 14.2 Outline Construction Traffic Management Plan [EN01032/EX1/WB6.3.14.2_A]</b>.</p>
TBHS-15	Alternatives and Design Evolution Noise and Vibration	Positioning of Inverters	"The position of the inverters should ensure they are installed away from the highway. Sudden noise and continuous levels of noise can be a hazard for equestrians as horses are flight animals, therefore the further these elements can be located from the highway, the better it will be for safety."	<p>Potential noise effects from proposed equipment were considered at an early stage in the design of scheme, which influenced the positioning of equipment. The likely impacts of noise and vibration have been assessed in Section 15.7 of <b>6.2.15 Environmental Statement - Chapter 15 Noise and Vibration [APP-053]</b>. Equestrian receptors have not been specifically assessed, as this is not required by the EIA guidance. However, referring to the noise contour plots within <b>6.3.15.3 Environmental Statement - Appendix</b></p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p><b>15.3 Assessment of Key Effects [APP-131]</b> (figures 15.3.1 to 15.3.5), noise effects rarely occur outside the boundaries of each Site. Resultingly, the noise and vibration effects are not anticipated to be significant and therefore the risks of noise impacts affecting equestrians is considered to be low. The Applicant considers its approach to the assessment to be proportionate and appropriate.</p>
TBHS-16	<p>Alternatives and Design Evolution</p> <p>Socio-economics, Tourism and Recreation</p>	The Scheme's Community Benefit	<p>"The community benefit mentions walking and cycling networks at the exclusion of equestrians. According to BETA two-thirds of equestrians are women and Church et al (2010) found 37% of women who are horse riders are over 45 years of age and over a third would pursue no other physical activity. Developers should be looking at how to include this group, not how to exclude them. How will the design protect and enhance the existing public bridleways, byways and UCR's and ensure they remain accessible during the project lifetime?"</p>	<p>The permissive path, as described though paragraph 3.9.5 of <b>7.6 Design and Access Statement [APP-314]</b>, is intended primarily as a footpath due to the anticipated users predominantly being on foot.</p> <p>It was not considered necessary or suitable to provide a facility for horse-riders or cyclists. Furthermore, the permissive path does not connect to the wider bridleway network. The wider bridleway network is identified within Appendix B of <b>6.3.14.3_A Environmental Statement - Appendix 14.3 Outline Public Rights of Way Management Plan Revision A [EN010132/EX1/WB6.3.14.3_A]</b>. Therefore, there is unlikely to be a significant demand from equestrian users.</p>
TBHS-17	General	DMMO Applications near to Scheme	<p>"DMMO applications 442, 501, 581, 590, 591, are on the register of Definitive Map Modification Order applications.</p>	<p>The Applicant notes this comment but does not consider these DMMO applications of material consideration.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<a href="https://www.lincolnshire.gov.uk/directory/8/register-of-dmmo-applications">https://www.lincolnshire.gov.uk/directory/8/register-of-dmmo-applications</a>	<p>DMMO applications 442, 581 and 590, and 591 all refer to routes defined on Lincolnshire County Council's "Electronic working copy definitive map" as unmetalled roads/green lanes which already legally have unlimited access to equestrian (or other PRow) users.</p> <p>DMMO application 501 refers to a footpath application in West Ashby, some 35km to the southeast of WB1 and is therefore not considered relevant.</p>
TBHS-18	<p>Principle of Development (DCO)</p> <p>Transport and Access</p> <p>Socio-economics, Tourism and Recreation</p>	Stopping up of PRowS	"Temporary stopping up is difficult to ascertain on the plans and clarity of proposed period."	<p>Public Rights of Way may be subject to short-term temporary diversions or closures to facilitate cable laying as set out in para 3.13 of <b>6.3.14.3_A Environmental Statement - Appendix 14.3 Outline Public Rights of Way Management Plan Revision A [EN010132/EX1/WB6.3.14.3_A]</b>.</p> <p>All Public Rights of Way on and surrounding the Sites are to remain open during construction where feasible, and all existing Public Rights of Way are to be retained during the Scheme's operational lifetime.</p> <p>A Public Rights of Way Management Plan that is substantially in accordance with the outline PRowMP <b>[EN010132/EX1/WB6.3.14.3_A]</b> will be implemented during the construction phase of the Scheme. This will be submitted and approved prior to the commencement of construction of the Scheme, as secured through Requirement 18</p>



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> .
TBHS-19	Transport and Access	Assessment Methodology	"Table 14.6 (Chapter 14 Transport and Access) has counted walkers and cyclists on the bridleway but have equestrians been considered? The low usage from all users may be the result of poor access to the off-road routes, low density of PRoW and that often the routes are disconnected therefore not offering circular or longer distance trails. Surely riding, walking and wheeling should be encouraged in the area, not dismissed."	It is acknowledged that horse riders may use the local highway network and bridleways operate close to, or through the Scheme. An addendum will be prepared to <b>6.2.14 Environmental Statement - Chapter 14 Transport and Access [APP-052]</b> and will be submitted at Deadline 1 to include equestrians.
TBHS-20	Socio-economics, Tourism and Recreation	Assessment Methodology	"Likewise, Chapter 18 Socio Economics Tourism and Recreation, ignores equestrian sport, amenity, countryside access and tourism – the language used, which could be construed as discriminatory, needs to reflect all user groups; walking, wheeling and riding is more inclusive and accurate in respect of activity, ability, age and gender."	Impacts on livery yards and equestrian services have not been assessed as the <b>6.3.2.2 Environmental Statement - Appendix 2.2 EIA Scoping Opinion [APP-068]</b> does not refer to the need to specifically assess equestrian facilities, rather it only refers to assessing the impacts on horse-riding activities in the traffic and transport assessment (see scoping response from UK HSA, pg. 157 <b>[APP-068]</b> ).  The number of equestrian sports facilities identified within the areas immediately affected by the location of the Scheme is small, and thus they have not been explicitly separated from the assessment of tourism and recreational facilities assessed in <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and</b>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<b>Recreation [APP-056].</b> The Applicant considers its approach to the assessment to be proportionate and appropriate.
TBHS-21	Socio-economics, Tourism and Recreation	Equestrian Industry	"The equestrian industry generates £4.7 billion of consumer spending, £5,548 per horse (BETA, 2019) is contributed to the economy benefitting local economies where equestrian activities thrive. DEFRA has recorded 5,599 horses in the immediate DN10, DN22, LN1 and DN21 postcode areas (2021), making a total of £31,063,252 contribution to the economy. There are livery yards in the area creating employment and using equine services (vet, farrier, feed, instructors, etc) as well as growing interest in equestrian tourism ('take your horse on holiday')."	<p>Impacts on livery yards and equestrian services have not been assessed as the <b>6.3.2.2 Environmental Statement - Appendix 2.2 EIA Scoping Opinion [APP-068]</b> does not refer to the need to assess equestrian facilities specifically, rather it only refers to assessing the impacts on horse-riding activities in the traffic and transport assessment (see scoping response from UK HSA, pg. 157 <b>[APP-068]</b>).</p> <p>That notwithstanding, Ingleby Hall Livery is located immediately adjacent to the site at West Burton 2, and shares access with the proposed construction and operation access 5 (as identified in Figure 4.1 of <b>6.3.14.1_A Environmental Statement - Appendix 14.1 Transport Assessment Revision A [EN010132/EX1/WB6.3.14.1_A]</b>). The Applicant confirms that banksmen will be positioned at the shared access point during construction to minimise conflict between construction and livery traffic, as set out in the mitigation provided in the outline <b>6.3.14.2_A Environmental Statement - Appendix 14.2 Construction Traffic Management Plan Revision A</b></p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>[EN010132/EX1/WB6.3.14.2_A]. The mitigation measures therein are secured by Requirement 15 of Schedule 2 to <b>3.1_A Draft Development Consent Order Revision A</b> [EN010132/EX1/WB3.1_A].</p> <p>Furthermore, due to the small number of other identified facilities in proximity to the Scheme, and the non-significant anticipated effect on the Public Right of Way network available to equestrian users (see Tables 18.15 and 18.20 in <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b>), direct impacts on equestrian facilities and businesses in the Local Impact Area have not been considered further.</p> <p>The Applicant considers its approach to the assessment to be proportionate and appropriate.</p>
TBHS-22	Principle of Development Transport and Access	Construction Traffic Management Plan	<p>"Damage to surfaces of the PRoW should be repaired within a timeframe, not open-ended. Also damage to the highway eg verges should be repaired in a timely manner to ensure that the whole width of the highway can be used by vulnerable road users, particularly where refuge from HGV's and other construction traffic is required."</p>	<p>The Applicant notes that the British Horse Society is making reference to paragraph 7.2 (i) of <b>6.3.14.2_A Environmental Statement - Appendix 14.2 Construction Traffic Management Plan Revision A</b> [EN010132/EX1/WB6.3.14.2_A], which states that "Any damage to the surface of the footpath will be repaired as soon as practicable".</p> <p>An Outline Construction Traffic Management Plan (CTMP) has been prepared to support the application within <b>6.3.14.2_A Environmental</b></p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p><b>Statement - Appendix 14.2 Construction Traffic Management Plan Revision A [EN010132/EX1/WB6.3.14.2_A]. 3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>, provides (in Requirement 15 of Schedule 2) that <i>"No part of the authorised development may commence until a construction traffic management plan for that part must be submitted to and approved by the relevant planning authority or, where the part falls within the administrative areas of multiple relevant planning authorities, each of the relevant planning authorities"</i>. It further provides that <i>"The construction traffic management plan must be substantially in accordance with the outline construction traffic management plan."</i> As such, the Applicant can confirm that the provision for the repair of damage to the surface of the footpath as soon as practicable will be secured through this mechanism.</p>

**Table 2.3.16: Applicant's Response to UK Health Security Agency [RR-341]**

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
UKHSA-01	The Interested Party	Context of UKHSA's Representation	"Thank you for your consultation regarding the above development. The UK Health Security Agency (UKHSA) welcomes the opportunity to comment on your proposals at this stage of the	The Applicant notes this comment.

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			project. Please note that we request views from the Office for Health Improvement and Disparities (OHID) and the response provided is sent on behalf of both UKHSA and OHID."	
UKHSA-02	Other Environmental Matters (Human Health)	Impacts on Human Health	"We can confirm that: With respect to Registration of Interest documentation, we are reassured that earlier comments raised by us on 08 January 2023 have been addressed. In addition, we acknowledge that the Environmental Statement (ES) has not identified any issues which could significantly affect public health. UKHSA/OHID is satisfied with the methodology used to undertake the environmental assessment. Following our review of the submitted documentation we are satisfied that the proposed development should not result in any significant adverse impact on public health. On that basis, we have no additional comments to make at this stage and can confirm that we have chosen NOT to register an interest with the Planning Inspectorate on this occasion."	The Applicant notes this comment and welcomes the UKHSA's position.

**Table 2.3.17: Applicant's Response to United Kingdom Atomic Energy Authority [RR-342]**

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
UKAEA-01	Principle of Development	Impact of the Scheme on Future	"The West Burton Solar Project has the potential to directly affect the United Kingdom Atomic Energy Authority's ("UKAEA") plans for the future	[Mine is a grid-centric response, I think we need a legalese response to UKAEA which says they don't have concrete plans, haven't set out what they

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
	Energy Need	Nuclear Fusion Technology	of the EDF West Burton Power Station. UKAEA researches fusion energy and related technologies, with the aim of positioning the UK as a leader in sustainable nuclear energy. UKAEA is an executive non-departmental public body, sponsored by the Department for Energy Security and Net Zero. The EDF West Burton Power Station will become home to the second generation Spherical Tokamak for Energy Production (STEP), which is a project to harness the energy of atomic fusion."	<p>are going to do or what the affect on them might be and of course stress urgency at this end.]</p> <p>Section 5.3 of <b>7.11 Statement of Need [APP-320]</b> sets out the urgent need for decarbonisation of the electricity sector, indeed Paragraph 8.9.3 of the Statement of Need explains that in 2021, BEIS (now DESNZ) unveiled plans to decarbonise UK power system by 2035.</p> <p>The plans focus on building a secure, home-grown energy sector that reduces reliance on fossil fuels and exposure to volatile global wholesale energy prices and solar is part of that solution.</p> <p>Section 8.4 <b>[APP-320]</b> describes the connection process of generators to the National Electricity Transmission System (NETS) and Section 9.1 describes National Grid's processes to ensure that future needs are anticipated.</p> <p>The Applicant holds a Grid Connection Agreement and if in the future other schemes come forward to connect, their requirements will be assessed by National Grid at the time.</p>

**Table 2.3.18: Applicant's Response to Weightmans LLP (on behalf of Northern Powergrid) [RR-347]**

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
NP-01	The Representation	Context of the NP's Representation	"The following representations are submitted on behalf of Northern Powergrid (Yorkshire) PLC ('Northern Powergrid') who are an electricity undertaker for the area within which the West Burton Solar Project is located: Northern Powergrid is in principle supportive of the above project but has concerns regarding the impacts that the proposed scheme will have on existing assets and their pending improvement works."	The Applicant notes this comment.
NP-02	Principle of Development (DCO)  Other Environmental Matters (Telecoms & Utilities)	Compulsory Acquisition and Impact on Existing Utilities	"Areas shown within the proposed development boundary have a direct impact on Northern Powergrid's existing critical national infrastructure which serve significant numbers of customers in the local and wider area, and the rights for these assets are essential in maintaining an uninterrupted power supply to the customers they serve. In particular, the proposed development seeks to interfere with Northern Powergrid's existing apparatus, access to such apparatus and servicing rights which are vital for Northern Powergrid's existing operations. The accompanying compulsory purchase order for the development seeks to acquire land and interests which, if acquired, would adversely affect Northern Powergrid's ability to use, upgrade and access its apparatus. It is not necessary to acquire these interests where an agreement between the parties would be more appropriate."	The Applicant notes this comment and will continue to engage with Northern Powergrid to, amongst other things, agree a set of final protective provisions to be included in the DCO. It is noted that the current protective provisions (in Part 5 of Schedule 16 to the <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> do provide that the Applicant cannot acquire any apparatus or override any easement or other interest of Northern Powergrid otherwise than by agreement with Northern Powergrid, such agreement not to be unreasonably withheld or delayed.  The requirement for on-site surveys to ground-truth the location of utilities is established in para 21.3.4 and 21.3.5 of <b>6.2.21 Environmental Statement - Chapter 21 Other Environmental Matters [APP-059]</b> and detailed within Table 3.14 of <b>7.1_A Outline Construction Environmental</b>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p><b>Management Plan Revision A [EN010132/EX1/WB7.1_A].</b> The production of a detailed CEMP has been secured by Requirement 13 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A].</b> The Applicant is committed to consultation and agreement with operators and/or owners of utility infrastructure that is likely to be directly impacted by the location or design of the Scheme.</p>
NP-03	Principle of Development (DCO)	Draft DCO: Protective Provisions	<p>"In addition to the technical impacts of the proposed development, Northern Powergrid has concerns over the proposed protective provisions contained within the draft order as they do not take into account site specific issues and do not accord with Northern Powergrid's standard protective provision requirements."</p>	<p>As noted in NP-02 above, draft protective provisions for the protection of Northern Powergrid are included in Part 5 of Schedule 16 to the <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A].</b> The Applicant looks forward to working with Northern Powergrid to agree a final set of protective provisions which address the site specific concerns raised.</p>
NP-04	General	Continuation of Engagement with Applicant	<p>"Northern Powergrid has discussed its concerns with West Burton Solar Project Limited and the parties are working closely to reduce the project's impacts on Northern Powergrid's apparatus. Northern Powergrid is keen to keep an open dialogue with West Burton Solar Project Limited and to engage with the applicant's legal representative to agree appropriate amendments to the protective provisions within the DCO."</p>	<p>The Applicant notes this comment and welcomes continued dialogue with Northern Powergrid.</p>



**Table 2.3.19: Applicant's Response to Witham & Humber IDB [RR-351]**

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
WHIDB-01	The Representation	Context of the WHIDB's Representation	Internal Drainage Board comments pertaining to watercourses within the Upper Witham IDB district.	The Applicant notes this comment and is committed to entering a Statement of Common Ground with Upper Witham IDB (as part of the Witham & Humber IDB group).

## 2.4 The Applicant's Responses to Parish Councils, Parish Meetings, or Neighbourhood Community Groups

Table 2.4.1: Applicant's Response to Brampton Village Parish Meeting [[RR-029](#)]

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
BVPM-01	Principle of Development	Objection to Scheme	"From the residents of Brampton Village, the majority view is clear. We are against the siting of 2000, 4.5m solar panels close to this small, rural village, together with battery storage buildings in Marton, for clear, rational reasons."	The Applicant notes this comment.
BVPM-02	Energy Need Alternatives and Design Evolution	Location and Scale of the Scheme	"The sheer scale of all of these projects will have a dramatic, negative impact on the area. Whilst the village understands the need to explore alternative energy sources, we do not believe that 10,000 acres of industrialisation of green belt with solar infrastructure, is the way forward."	<p>Section 3.3 of <b>7.11 Statement of Need [APP-320]</b> describes Government's view that large capacities of low-carbon generation will be urgently required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar".</p> <p>Section 7 of <b>7.5 Planning Statement [APP-313]</b> concludes with a consideration of the Planning Balance and justifies how the overwhelming national need, as demonstrated in the Statement of Need outweighs any potential significant adverse impacts which, as the <b>Environmental Statement [APP-039 to APP-061]</b> sets out, are limited.</p> <p>The Applicant furthermore wishes to clarify that no land within the Order Limits of West Burton, Cottam, Gate Burton, or Tillbridge (the last three are assumed to be the "projects" that the</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				Interested Party is referring to) is designated as Green Belt, as this is a specific policy designation for areas around major urban centres to prevent urban sprawl. The nearest Green Belt is the South and West Yorkshire Green Belt where it extends between Bawtry and Tickhill, and is thus no closer than 15km from the Order Limits for West Burton.
BVPM-03	Soils and Agriculture	Food Security	"These projects will take out 10,000 acres of valuable food production land, at a time when the country is desperate to secure our own food sources and reduce imports."	Defra produce a UK food security report <sup>3</sup> , the most recent of which was published in 2021. It notes that key risks to UK food security include climate change and soil degradation. Development of UK agricultural land is not noted among these risks. In addition to renewable energy, the Scheme is anticipated to enable the recovery of soil organic matter through the reversion of arable land to less intensive agricultural uses for the duration of the operation of the Scheme. For further details please see Paragraph 19.9.14 of <b>6.2.19 Environmental Statement – Chapter 19 Soils and Agriculture [APP-057]</b> .
BVPM-04	Ecology and Biodiversity	Impact on Ecology and Biodiversity	"The installation of such a large expanse of technology will negatively impact on wildlife welfare and diversity, at a time when this country	Section 9.6 of <b>6.2.9 Environmental Statement – Chapter 9 Ecology and Biodiversity [APP-047]</b> sets out the extensive findings of all ecological investigations undertaken within the Order Limits

<sup>3</sup> UK Food Security Report 2021, Department for Environment Food & Rural Affairs

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>is amongst the world's worst example of reduction in diversity."</p>	<p>together with an appraisal of the relative importance of each species or species group, habitat or designated site potentially affected by the Scheme. A comprehensive package of mitigation measures has been identified, in tandem with embedded mitigation (see Section 9.6) which is secured through the ecologically sensitive design of the Scheme (and includes measures such as the wide buffering of all field boundaries and the use of existing hedgerow gaps for accesses). These measures are detailed within <b>7.17 Outline Ecological Protection and Mitigation Strategy [APP-326]</b> and <b>7.3_A Outline Landscape and Ecological Management Plan Revision A [EN010132/EX1/WB7.3_A]</b> which is secured through Requirements 7 and 8 in Schedule 2 of the <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p> <p>These documents aim to ensure that all identified impacts are minimised as far as possible. In many cases, the reversion from intensive agriculture to pasture or meadow grassland with additional hedgerow, scrub, tree and wetland habitat creation will bring about positive effects for wildlife. In particular, terrestrial and aquatic invertebrates, botanical diversity, small mammals and many species of bird all stand to benefit as set out in paragraphs 9.7.185 to 9.7.188 in <b>6.2.9</b></p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<b>Environmental Statement - Chapter 9 Ecology and Biodiversity [APP-047] .</b>
BVPM-05	Landscape and Visual Impact Glint and Glare Socio-economics, Tourism and Recreation Other Environmental Matters (Human Health)	Human Health Impacts of the Scheme	"The human impact of such a huge development cannot be underestimated. Mental health and well-being have been cornerstones of recovery since the COVID pandemic. The residents of Brampton Village deserve more than to be surrounded by inefficient solar panels sited at an outrageous cost on green belt land."	<p><b>6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> (the 'LVIA') includes a full and detailed assessment that deals with both effects on the landscape itself and effects on the visual amenity of people, as well as interrelationships of these with other related topics in the ES. The LVIA process is iterative and as a result, the design of the Scheme has changed to respond to the findings of the assessment to ensure that landscape mitigation is fully considered as part of the process.</p> <p>The LVIA takes into account the effects on visual amenity and landscape character, including proximity to people's houses. This aspect of the LVIA includes selected towns or villages, groups of buildings and singular buildings (the 'Residential Receptors') within the 1km Study Area. These towns or villages include the settlement of Brampton. Specific residential receptors within Brampton that have been taken into consideration that include R70 Residents in Brampton, R71 Grange Bungalow and R72 The Grange Farm. <b>These residential receptors have been assessed</b> and the effects, as a result of the Scheme, are <b>Not Significant</b>. This is due to the</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>intervening vegetation (mostly tree cover) to the east of the settlement, particularly associated with the minor watercourse, Bellwood Grange Farm and Manor Farm.</p> <p>The LVIA has also considered the impacts to landscape character and visual amenity for the users of PRow. This is set out in <b>6.3.8.3 Environmental Statement - Appendix 8.3 Assessment of Potential Visual Effects [APP-074]</b>.</p> <p>Please refer specifically to Public Rights of Way Receptors PR048 (Bram/956/1 – Tork/957/1), PR049 (Tork/779/1) and PR050 (Tork/96/1 – Tork/96/2) are located to the southwest of Brampton outside the DCO limits with the West Burton 3 (WB3) site being located to the northeast of the settlement. With these PRow, any long-range views of the Site are prevented by intervening vegetation and settlement and so there is no mitigation specific to these receptors.</p> <p>Native hedgerows within and on the boundaries of the WB3 Site would be retained and reinforced with new native trees. Hedgerows would also be maintained at a taller height (c5m). The landscape proposals also include for a new native woodland</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>shelterbelt along the western boundary of the Site. Once established, these measures, combined with the additional tree planting, would help break up views of the array, substation and associated infrastructure. During the spring and summer, when the vegetation is out in leaf, the hedgerows and trees would soften and filter views. Available views would be limited to transient views through gate entrances and over low hedgerows.</p> <p>These mitigation measures will help improve the landscape fabric. Newly planted trees and joined up intact hedgerows in the landscape would also help break up the flat arable fields These mitigation measures are set out within <b>7.3_A Outline Landscape and Ecological Management Plan Revision A [EN010132/EX1/WB7.3_A]</b> and will be secured through Requirement 7 in Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p> <p>The Applicant is cognisant of the significance of the countryside for physical and mental wellbeing and, as such, likely impacts on the desirability and use of recreational facilities in the countryside, such as public rights of way, have been assessed in Section 18.7 of <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b>. The greatest</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>level of effect to access, desirability and use of recreational facilities is limited to short- to medium-term moderate adverse effects on long distance recreational routes (the Trent Valley Way and National Byways) during construction (see Table 18.15 and para. 18.7.62). This is a <b>significant adverse</b> effect. This is however the only significant effect anticipated, with no greater than moderate-minor adverse effect anticipated to any other recreational receptor during construction (see paras. 18.7.60 to 18.7.69), or to any recreational receptor during operation (see paras. 18.7.107 to 18.7.117) and decommissioning (see paras. 18.7.147 to 18.7.157). These effects are not anticipated to be significant.</p> <p>This is re-iterated in Section 21.5 of <b>6.2.21 Environmental Statement - Chapter 21 Other Environmental Matters [APP-059]</b>.</p> <p>The Applicant furthermore wishes to clarify that no land within the Order Limits of West Burton, is designated as Green Belt, as this is a specific policy designation for areas around major urban centres to prevent urban sprawl. The nearest Green Belt is the South and West Yorkshire Green Belt where it extends between Bawtry and Tickhill, and is thus no closer than 15km from the Order Limits for West Burton.</p>



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
BVPM-06	General	Impact on Property Value and Exclusion from Decision Making	<p>"Finally, the impact on the value &amp; potential demand for property in Brampton can only be negative. The village is of the view that the proposals will reduce the value of their properties. This is a bad proposal, made worse by the complete exclusion of residents views as a result of decisions taken outside the usual planning procedures. There will be winners and losers; the winners will clearly be business and land owners, but the local population/residents will certainly be losers should any of these schemes be approved."</p>	<p>Property value is not a consideration for decision making on DCO applications. As such, impacts on property values have not been assessed as part of the application. Nonetheless, there is no strong evidence to show solar farms negatively affect nearby property value, and it is more likely that other (including opposing) factors are more significant to changes in property value.</p> <p>As stated in paragraph 5.2.2 of <b>7.5 Planning Statement [APP-313]</b>, the Scheme is defined as an NSIP under Sections 14(1)(a), 15(1) and 15(2) of the Planning Act 2008.</p> <p>As such, under Section 103 of the Planning Act 2008, the Secretary of State has the function of deciding an application for an order granting development consent.</p> <p>Local Authorities have a statutory role throughout the DCO process.</p> <ul style="list-style-type: none"> <li>• Section 42 of the Planning Act 2008 (PA2008) provides that the Applicant must consult with each local authority, as prescribed within Section 43 of the PA2008.</li> <li>• Section 56 of the PA2008 provides that the Applicant must give notice to each local authority, as prescribed within Section 56A, where the Secretary of State accepts an</li> </ul>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>application for an order granting development consent.</p> <ul style="list-style-type: none"> <li>Section 60 (2) of the PA2008 provides that the Secretary of State must give notice in writing to each local authority, as prescribed within Section 56A, inviting them to submit a local impact report.</li> </ul> <p>The Planning Inspectorate's "Advice Note One: Local Impact Reports", which was republished in April 2012 on the Planning Inspectorate's website, notes the importance of Local Impact Reports and that "in coming to a decision, the Secretary of State must have regard to any LIRs that are submitted by the deadline".</p> <p>Furthermore, Section 47 of the Planning Act 2008 sets out the duty for the Applicant to consult with the local community prior to the DCO Application being made. This Section 47 consultation was held from June to August 2022, with materials presented at consultation found at <b>5.7 Consultation Report - Appendix 5.7 Phase Two Community Consultation Materials [APP-029 to APP-031]</b>. The Applicant's response to comments made at the Section 47 consultation is presented in <b>5.12 Consultation Report - Appendix 5.12 - Section 47 Applicant Response [APP-036]</b>.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>Members of the local community are afforded the opportunity to register as Interested Parties, so that they can attend hearings and make oral and written representations to the examination of a DCO Application, ensuring that there is opportunity during the decision-making process for the voice of the local community to be heard and responded to.</p>

**Table 2.4.2: Applicant's Response to Brattleby Parish Council [RR-030]**

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
BPC-01	Energy Need Soils and Agriculture	Use of agricultural land	"The solar project is using valuable farm land required to provide food and use for animal grazing"	<p>Section 3.3 of <b>7.11 Statement of Need [APP-320]</b> describes Government's view that large capacities of low-carbon generation will be urgently required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar".</p> <p>It is the Applicant's view (and this aligns with Government's view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p> <p>Defra produce a UK food security report, the most recent of which was published in 2021. It notes that key risks to UK food security include climate change and soil degradation. Development of UK agricultural land is not noted among these risks. In addition to renewable energy, the Scheme is anticipated to enable the recovery of soil organic matter through the reversion of arable land to less intensive agricultural uses for the duration of the operation of the Scheme. For further details please see Paragraph 19.9.14 of <b>6.2.19 Environmental Statement - Chapter 19 Soils and Agriculture [APP-057]</b>.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
BPC-02	Principle of Development	Scale of the Scheme	"the size is disproportionate particularly when taking into account the other projects which boundaries are adjacent to this project"	<p>The Applicant notes this comment and seeks to assure the Interested Party that a cumulative effects assessment has been prepared for the Application within the <b>Environmental Statement [APP-039 to APP-061]</b>.</p> <p>Cumulative effects assessments for each environmental topic are set out in each of the ES Chapters and include the assessment of the impacts of the Scheme cumulatively with the NSIPs identified by 7000 Acres (Gate Burton Energy Park, Cottam Solar Project and Tillbridge Solar Project) (see paragraph 2.5.9 of <b>6.2.2 Environmental Statement - Chapter 2 EIA Process and Methodology [APP-040]</b>).</p> <p>This assessment has been carried out in accordance with Schedule 4 of the 2017 EIA Regulations and PINS Advice Note 17. The mitigation measures set out across the ES therefore account for anticipated cumulative effects.</p> <p>Section 7.5 of <b>7.11 Statement of Need [APP-320]</b> describes how suitable locations for large-scale solar are identified and assessed. Paragraph 7.5.2 outlines the broad criteria for determining site suitability.</p> <p>Figure 7.4 <b>[APP-320]</b> shows the level of photovoltaic power potential at the proposed location for the Scheme. Section 9 describes the</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>advantages of connecting large-scale solar to the existing and robust National Electricity Transmission System at the proposed Point of Connection at West Burton Power Station, and Paragraph 9.4.4 concludes that the Scheme will contribute to national system adequacy and decarbonisation targets.</p> <p><b>6.2.5 Environmental Statement - Chapter 5 Alternatives and Design Evolution [APP-043]</b> and its accompanying appendix <b>WB6.3.5.1_A Environmental Statement - Appendix 5.1 Site Selection Assessment Revision A [AS-004]</b> explains how the sites for the Scheme was chosen in light of the identified need for large scale solar.</p> <p>Specifically, paragraph 2.1.10 <b>[AS-004]</b> explains the reasons why a site of the size proposed is required to meet the 480MW grid connection offer which the Applicant holds. The methodology used for the site selection process is considered reasonable and proportionate and complies with the requirements of Overarching National Policy Statement for Energy (NPS EN-1) paragraph 4.4.3, as explained at Section 2.1 <b>[AS-004]</b>.</p>
BPC-03	Principle of Development	Cumulative Effects and Scheme Design	"the total area subsumed by these projects will cover 10,000 acres to a height of 4.5 m with black reflective glass, this is put simply an un desirable intrusion into the county side by domestic and	The Applicant respectfully disagrees with the Parish Council's comment and considers the approach taken and subsequent conclusions regarding assessing the landscape and visual

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
	<p>Alternatives and Design Evolution</p> <p>Landscape and Visual Impact</p>		<p>industrial paraphernalia which will blight this area for years to come."</p>	<p>impacts of the Scheme would not result in significant adverse effects on landscape character and visual amenity over an extensive area as demonstrated Section 8.7 in <b>6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> and <b>7.3_A Outline Landscape and Ecological Management Plan Revision A [EN010132/EX1/WB7.3_A]</b> which is secured by Requirement 7 in Schedule 2 of the <b>dDCO [EN010132/EX1/WB3.1_A]</b>.</p> <p>The Scheme will also provide extensive areas of mitigation along the existing sections of footpaths and bridleways to enhance their amenity value and benefit the public as a whole as demonstrated in <b>6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b>.</p>

**Table 2.4.3: Applicant's Response to Broxholme Parish Meeting [RR-031]**

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
BPM-01	General	Statement of Opposition to DCO Application	"The news that Island Green Power (IGP) was seeking a development consent order- DCO- for a series of solar farm developments which included the West Burton 1 site at Broxholme caused alarm and distress to the majority of the parishioners of Broxholme. As a result of this the Broxholme Parish Meeting appointed a team of researchers to investigate the proposal. The outcome of this research indicated that claims made by IGP were open to challenge in terms of their accuracy and validity."	The Applicant notes this comment, and is confident that the DCO application and its constituent documents are accurate and the assessments therein are valid.
BPM-02	General	Quality of DCO Application	"Further concerns were identified about the argument for Solar Energy by IGP which suggested that "solar farms are generating local environmental benefits, supporting flora and fauna and increasing biodiversity". There is little to no scientific research to back up these statements."	<p>The Applicant respectfully disagrees and directs the Broxholme Parish Meeting to <b>6.2.9 Environmental Statement - Chapter 9 Ecology and Biodiversity [APP-047]</b> and its associated appendices <b>[APP-077 to APP-088]</b>. These documents set out the assessment of impacts from the Scheme on ecology and biodiversity, and contextualises the evidence base upon which the assessment is made.</p> <p>In many cases, the reversion from intensive agriculture to pasture or meadow grassland with additional hedgerow, scrub, tree and wetland habitat creation will bring about positive effects for wildlife. In particular, terrestrial and aquatic invertebrates, botanical diversity, small mammals and many species of bird all stand to benefit.</p>



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>In this way, a substantial net gain for biodiversity will be achieved (see <b>6.3.9.12 Environmental Statement - Appendix 9.12 Biodiversity Net Gain Report [APP-088]</b>), predominantly through the creation of extensive low-input grassland resulting in a net gain of 86.80% in habitat units, but also several new ponds and wetland habitat parcels resulting in a net gain of 33.25% in river units, and the planting of several kilometres of species-rich hedgerow resulting in a net gain of 54.71% in hedgerow units.</p> <p>This is secured through Requirement 9 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>, which states that "No part of the authorised development may commence until a biodiversity net gain strategy has been submitted to and approved by the relevant planning authority, in consultation with the relevant statutory nature conservation body."</p>
BPM-03	General	Quality of DCO Application	"As a result of our extensive research, we concluded that the IGP West Burton proposal was ill conceived and that it was to be opposed by the Broxholme Parish Meeting"	The Applicant respectfully disagrees with Broxholme Parish Meeting's conclusion, but acknowledges their objection.
BPM-04	Principle of Development	Location of Solar Development	"As a community we accept that we need solar development, but it needs to be in the right place. The right place is domestic and commercial roof	Section 3.3 of <b>7.11 Statement of Need [APP-320]</b> describes Government's view that large capacities of low-carbon generation will be urgently

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
	Energy Need Alternatives and Design Evolution		space, brownfield sites and to some extent poor grade land."	<p>required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar".</p> <p>Section 7.6 [APP-320] analyses the potential contribution of "brownfield" solar sites to the national need for solar generation. Brownfield sites, including rooftop and other community energy systems, are likely to grow in the UK and will make a contribution to the decarbonisation of the UK energy system. However, the Statement of Need concludes that on their own, brownfield developments are unlikely to be able to meet the national need for solar. Section 8.5 of the Statement of Need describes and agrees with Government's view that decentralised and community energy systems are unlikely to lead to the significant replacement of large-scale infrastructure. It is the Applicant's view (and this aligns with Government's view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p>
BPM-05	General (Consultation)	Consultation Feedback	"Unfortunately, IGP have not been forthcoming with meaningful answers to challenging questions from parishioners and feedback from their consultation has been poor to non-existent."	The Applicant acknowledges this comment but is confident that the level of consultation undertaken, and information presented throughout the pre-application stage was in accordance with the Planning Act 2008 and

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>associated guidance. This has been evidenced in <b>5.1 Consultation Report [APP-022]</b>, which was submitted to the Planning Inspectorate and accepted for examination.</p> <p>For example, as described in Chapter 2 <b>[APP-022]</b>, the Applicant undertook two phases of community consultation to share information and invite feedback at different stages of Scheme development.</p> <p>Chapter 7 <b>[APP-022]</b> describes the Applicant's approach to statutory consultation, including consulting with relevant authorities on a draft Statement of Community Consultation. Table 7.1 sets out the comments received from authorities on the Applicant's approach to consultation and how the Applicant has had regard to these in developing the Scheme. Table 7.3 in Chapter 7 describes how the Applicant complied with commitments made in the Statement of Community Consultation when undertaking statutory consultation.</p> <p>Chapter 8 <b>[APP-022]</b> describes how the Applicant undertook a six-week statutory phase two consultation on the Scheme, during which the Applicant presented consultees with environmental information sufficient for consultees to understand the potential likely significant effects of the Scheme in a Preliminary</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>Environmental Impact Report (PEIR). A non-technical summary was published to accompany the PEIR, with public information events and free-to-use communications channels open to help aid accessibility and understanding of the Scheme. A Consultation Summary Report for this phase of statutory consultation was published on the dedicated Scheme website, shared with elected representatives and stakeholders and issued to over 9,000 properties within the vicinity of the Scheme, to help consultees understand how their feedback was being considered. A copy of the Phase Two Consultation Summary Report is provided at pp.36-43 of <b>5.7 Consultation Report - Appendix 5.7 Phase Two Community Consultation Materials - Part 3 of 3 [APP-031]</b>.</p> <p>Chapter 11 of <b>5.1 Consultation Report [APP-022]</b> describes the significant volume of responses received to Section 47 consultation (local community), including the issues raised and how the Applicant has had regard to these in developing the Scheme. This is further evidenced by <b>5.12 Consultation Report - Appendix 5.12 - Section 47 Applicant Response [APP-036]</b>.</p> <p>The host authorities have confirmed that the statutory consultation process was adequate through their <b>Adequacy of Consultation Representations [AoC-001 to AoC-013]</b>.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
BPM-06	General	Request for Issues to be Examined	"As a Parish we are concerned about the following issues and would request that the Planning Inquiry investigate them in depth. Additional detail will be available at the next stage of the inquiry:"	The Applicant notes this comment and has responded to each of the issues in turn below.
BPM-07	Energy Need Principle of Development	Cumulative Impacts from NSIPs in Trent Valley	"Scale: The number of NSIPS proposals for the Trent Valley and their cumulative detrimental impact on the environment and economy cannot be justified upon in depth scrutiny of the West Burton development and other current DCO application proposals from other sites."	<p>Section 3.3 of <b>7.11 Statement of Need [APP-320]</b> describes Government's view that large capacities of low-carbon generation will be urgently required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar".</p> <p>It is the Applicant's view (and this aligns with Government's view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p> <p>Section 7 of <b>7.15 Planning Statement [APP-313]</b> concludes with a consideration of the Planning Balance and justifies how the overwhelming national need, as demonstrated in the Statement of Need outweighs any potential significant adverse impacts which, as the <b>Environmental Statement [APP-039 to APP-061]</b> sets out, are limited.</p> <p>Cumulative effects assessments for each environmental topic are set out in each of the ES Chapters and include the assessment of the</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>impacts of the Scheme cumulatively with the Gate Burton Energy Park, Cottam Solar Project and Tillbridge Solar Project (see paragraph 2.5.9 of <b>6.2.2 Environmental Statement - Chapter 2 EIA Process and Methodology [APP-040]</b>).</p> <p>This assessment has been carried out in accordance with Schedule 4 of the 2017 EIA Regulations and PINS Advice Note 17. The mitigation measures set out across the ES therefore account for anticipated cumulative effects.</p>
BPM-08	Soils and Agriculture Alternatives and Design Evolution	Loss of Agricultural Land	<p>"Loss of Agricultural land: BMV land which is not permitted to be developed will be lost due to this and other solar proposals. This land should be removed from any development application. There is a blatant land grab at West Burton 1 site plot M1 which is 100% BMV3a Land and is separated from the main site by Main Street."</p>	<p>Agricultural land resource is not lost to or degraded by solar farm development. Agricultural production can be maintained through the operational period of the Scheme, through, for example, grazing livestock on the pasture below and between solar panels. See paragraph 19.3.3 of <b>6.2.19 Environmental Statement - Chapter 19 Soils and Agriculture [APP-057]</b>.</p> <p>The Applicant respectfully disagrees with the comment pertaining to West Burton 1. Field M1 is the subject of an option agreement between the Applicant and the landowner along with the rest of West Burton 1. . ALC surveys have concluded that field M1 is approximately 85% BMV (Grade 3a) as shown in <b>6.3.19.1 Environmental Statement - Appendix 19.1 Agricultural Land</b></p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p><b>Quality, Soil Resources and Farming Circumstances Report [APP-137].</b> The remaining area is Grade 3b and includes the existing field entrance. Therefore, and as per the reasoning set out Table 5.9 (pg.44) of <b>6.2.5 Environmental Statement - Chapter 5 Alternatives and Design Evolution [APP-043]</b>, the field was retained in the Order Limits for the DCO Application.</p>
BPM-09	Soils and Agriculture  Socio-economics, Tourism and Recreation	Use of Food Producing Land	"Industrialisation of a rural landscape and net job loss: Food producing land will be lost. Related food producing industry employment in the area will be negatively impacted. This impact will need assessing in detail."	<p>Agricultural land resource is not lost to or degraded by solar farm development.</p> <p>Defra produce a UK food security report, the most recent of which was published in 2021. It notes that key risks to UK food security include climate change and soil degradation.</p> <p>Development of UK agricultural land is not noted among these risks. In addition to renewable energy, the Scheme is anticipated to enable the recovery of soil organic matter through the reversion of arable land to less intensive agricultural uses for the duration of the operation of the Scheme. For further details please see Paragraph 19.9.14 of <b>6.2.19 Environmental Statement - Chapter 19 Soils and Agriculture [APP-057]</b>.</p> <p>The Scheme is anticipated to lead to a maximum loss of approximately 13 full-time equivalent</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>agriculture jobs, as stated in paragraph 18.7.15 of document <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b>. The Scheme is estimated to employ 8 full-time equivalent employees from the local area during operation; see Table 18.16. The net change in employment in the local area (defined as West Lindsey and Bassetlaw Districts) during the Scheme's operational life is a loss of approximately 2 full-time jobs, once consideration of direct, indirect and induced employment, and impacts on the tourism and recreation industry is taken into account (see para. 18.7.81). Overall, the economic benefit to the local area is estimated to be £1.5 million per year (see para. 18.7.99).</p>
BPM-10	Landscape and Visual Impact	Visual Impacts and Mitigation Measures	<p>"Visual impact: Iconic rural Lincolnshire's "Big Sky Landscape" and Visual Amenity will be destroyed by Solar Farm Technology dominating the landscape and making villages and dwellings subordinate to the developments. This is not good practice! Proposed mitigation measures are inadequate and ineffective and at best will simply produce green walls which will obscure landscape views."</p>	<p>With regard to visual impacts and mitigation measures, <b>6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> (the 'LVIA') considers both the landscape and visual effects of the Scheme on the local environment and any recognised associations with the views across the landscape, and has incorporated these into the baseline for the assessment. The LVIA (para. 8.5.86) recognises the importance of long-distance views to the more elevated wooded skylines to the east, and long views to the north and south, which are</p>



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>constrained only by the effects of distance, riverside vegetation and hedgerows.</p> <p>The LVIA [APP-046] also includes a suite of viewpoints that cover long range views across the Till Vale encompassing the big expansive skies, for example viewpoints VP12, VP15, VP16 and VP35. There are also additional viewpoints at the request of Lincolnshire County Council that were agreed at the LVIA Workshops held prior to submission that also include these long-range views, for example LCC-C-A and LCC-C-J. The visual effects for the long-range views are set out in <b>6.3.8.3 Environmental Statement - Appendix 8.3 Assessment of Potential Visual Effects [APP-074]</b>.</p>
BPM-11	<p>Socio-economics, Tourism and Recreation</p> <p>Landscape and Visual Impact</p>	Tourism Impacts	<p>"Tourism industry in Broxholme: Broxholme Village is a tourist destination where four holiday let businesses are in operation. The rural setting and landscape views are imperative to the survival of these businesses. There is a five acre privately owned nature reserve within the village which allows wild camping and daytime public access. Impact of the Solar Farm upon this reserve will need assessing. A popular public footpath which runs through the village will have views obscured and degrade the walking experience."</p>	<p><b>6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> (the 'LVIA') includes a full and detailed assessment that deals with both effects on the landscape itself and effects on the visual amenity of people, as well as interrelationships of these with the features that may appeal to visitors and tourism. The LVIA process is iterative and as a result, the design of the Scheme has changed to respond to the findings of the assessment to ensure that landscape mitigation is fully considered as part of the process. For example, the LVIA mitigation has had regard to the need to</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>consider the landscape character and visual amenity for the users of PRoW.</p> <p>The Scheme will provide extensive areas of mitigation along the existing sections of footpaths and bridleways to enhance their amenity value and benefit the public as a whole as demonstrated in the LVIA [APP-046] (see paragraphs 8.8.22 to 8.9.29). The proposed mitigation would apply to public right of way receptors including those in and around Broxholme: PR006 (Brox/198/1), PR007 (Brox/197/1) and PR008 (Brox/196/1).</p> <p>The LVIA also considers the impacts and effects on residential receptors as part of the assessment process. The relevant singular buildings applying to Broxholme include R012, R013, R014, R015 and R096 and groups of buildings include R034 and R078. Those properties in close proximity to Green Acres include R034 Pingles and R078 Pool Cottage. These residential receptors have been assessed and the effects, as a result of the Scheme, are <b>Not Significant</b>. This is due to the distance and intervening vegetation across the landscape associated with the field boundaries and water bodies. Impacts on the accommodation sector, tourism and recreation have been assessed across the Local Impact Area (Bassetlaw and West Lindsey districts) as a whole in Section 18.7 of</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p><b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056].</b> Individual cases of impacts on rural businesses nearby to the Scheme, unless they are also identified as residential receptors in the LVIA [APP-046], have therefore not been assessed separately.</p> <p>The Applicant is cognisant of the significance of the countryside on the desirability and use of recreational facilities such as public rights of way. As such, these have been assessed in Section 18.7 of <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b>. The greatest level of effect to access, desirability and use of recreational facilities is limited to short- to medium-term moderate adverse effects on long distance recreational routes (the Trent Valley Way and National Byways) during construction (see Table 18.15 and para. 18.7.62). This is a <b>significant adverse</b> effect. This is however the only significant effect anticipated, with no greater than moderate-minor adverse anticipated to any other recreational receptor during construction (see paras. 18.7.60 to 18.7.69), or to any recreational receptor during operation (see paras. 18.7.107 to 18.7.117) and decommissioning (see paras. 18.7.147 to 18.7.157). These effects are not anticipated to be significant.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
BPM-12	Principle of Development  Other Environmental Matters (Human Health / Major Accidents and Disasters)  Air Quality	BESS Security and Safety Impacts	"Battery Storage technology and safety threat: The scale of the battery proposals poses a real security and safety threat to local communities. How will this impact on them?"	<p>The Applicant has submitted <b>7.9 Outline Battery Storage Safety Management Plan [APP-318]</b> and, through <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>, has secured by Requirement 6 of Schedule 2 that "Work No. 2 must not commence until a battery storage safety management plan has been submitted to and approved by the relevant planning authority."</p> <p>Paragraph 4.1.18 of <b>7.9 Outline Battery Storage Safety Management Plan [APP-318]</b> explains that the design of the BESS has integrated fire detection and suppression systems that will automatically operate to contain battery fires. Paragraph 5.3 states that if fire spreads to multiple units, external firefighting water facilities are available by means of 228,000 litre water storage tanks within the battery compounds.</p> <p>Human health and other environmental impacts resulting from plumes from potential battery fires have been initially assessed in <b>6.2.17 Environmental Statement - Chapter 17 Air Quality [APP-055]</b> and are proposed to be supplemented by additional information during the examination process.</p> <p>Risks to human health as a result of fires or unconfined explosions within the BESS compound are set out in paragraphs 21.6.42 to</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				21.6.48 of <b>6.2.21 Environmental Statement - Chapter 21 Other Environmental Matters [APP-059]</b> which concludes that there is no significant risk of harm to human health due to the physical separation of the BESS compound from publicly accessible areas.
BPM-13	Ecology and Biodiversity  Landscape and Visual Impact	Disturbance to Flora and Fauna	<p>"Disturbance to flora and fauna: Claims made by IGP for projected biodiversity gains need challenging in pursuit of real scientific data to substantiate the claims that have been made. Parishioners are alarmed that despite informing IGP WB1 developers that there are breeding pairs of Mute Swans on the River Till there is no mention of them in their survey work. Lincolnshire Nature have been informed by us. The WB1 site includes the foraging and flight path range of these swans and pose a real threat to their welfare. A resident farmer in Broxholme is alarmed at the prospect of high fencing channelling deer and other fauna onto their land causing damage. They have received no satisfactory response from the developer to address their concerns."</p>	<p><b>6.2.9 Environmental Statement - Chapter 9 Ecology and Biodiversity [APP-047]</b> sets out the extensive findings of all ecological investigations undertaken within the Order Limits together with an appraisal of the relative importance of each species or species group, habitat or designated site. This survey scope has been formulated through consultation with Natural England as well as Lincolnshire and Nottinghamshire Wildlife Trusts and has deemed to be thorough and appropriate.</p> <p>A comprehensive package of mitigation has been provided, in tandem with embedded mitigation which is secured through the ecologically sensitive design of the Scheme (such as the wide buffering of all field boundaries and the use of existing hedgerow gaps for accesses).</p> <p>These measures are further detailed within <b>7.17 Outline Ecological Protection and Mitigation Strategy [APP-326]</b> (as secured by Requirement 8 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A</b></p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>[EN010132/EX1/WB3.1_A]) and <b>7.3_A Outline Landscape and Ecological Management Plan Revision A [EN010132/EX1/WB7.3_A]</b> (as secured by Requirement 7 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>) which will ensure that all identified impacts are minimised as far as possible.</p> <p>In many cases, the reversion from intensive agriculture to pasture or meadow grassland with additional hedgerow, scrub, tree and wetland habitat creation will bring about positive effects for wildlife. In particular, terrestrial and aquatic invertebrates, botanical diversity, small mammals and many species of bird all stand to benefit as set out in Section 9.7 in <b>6.2.9 Environmental Statement - Chapter 9 Ecology and Biodiversity [APP-047]</b>.</p> <p>In this way, a substantial net gain for biodiversity will be achieved (see <b>6.3.9.12 Environmental Statement - Appendix 9.12 Biodiversity Net Gain Report [APP-088]</b>), predominantly through the creation of extensive low-input grassland resulting in a net gain of 86.80% in habitat units, but also several new ponds and wetland habitat parcels resulting in a net gain of 33.25% in river units, and the planting of several kilometres of</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>species-rich hedgerow resulting in a net gain of 54.71% in hedgerow units.</p> <p>Mute swan were recorded during 3 of 6 surveys undertaken within the Order Limits (see Tables 6 &amp; 7 within the <b>6.3.9.8 Environmental Statement - Appendix 9.8 Breeding Bird Survey Report [APP-084]</b>). Suitable nesting habitats for mute swan are not anticipated to be affected by the Scheme through the implementation of development free buffer zones along ditches and watercourses. Mute swans are a common and widespread breeding species within the UK and are Green Listed on the Conservation Concern Birds of Conservation Concern List prepared by the British Trust for Ornithology.</p> <p>The design also takes account of the spatial legibility for grazing and the migration of animal species since the fence comprises an open permeable mesh of a design that promotes the passage of animals through and across its bounds. The use of deer wire mesh fencing is set out in <b>7.13_A Concept Design Parameters Revision A [EN010132/EX1/WB7.13_A]</b>.</p> <p>The impact on wildlife resulting from the erection of fencing has been assessed within <b>6.2.9 Environmental Statement - Chapter 9 Ecology and Biodiversity [APP-047]</b>. The majority of animal species such as invertebrates, reptiles,</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>birds, small mammals, larger mammals such as badgers, hedgehogs, polecats and hares will not be impeded by fencing as they will be able to pass under, over or through the fencing and will be able to freely move through the operational sites. An impact on the movement of deer is likely (see paragraph 9.6.5 of <b>6.2.9 Environmental Statement - Chapter 9: Ecology and Biodiversity [APP-047]</b>), although it is acknowledged from the ecological monitoring of numerous active solar schemes that deer are regularly noted within the fenced areas having exploited locations of undulating terrain and other opportunities for entry.</p>
BPM-14	Principle of Development Ecology and Biodiversity	Ecological Disturbance from Cable Route Installation	"Cable routes and disturbance: Further ecological disturbance will be caused by the installation of infrastructure which is unacceptable and should be challenged."	<p>Potential and likely impacts on ecology resulting from the cable installation works have been identified and described within Section 9.5 of <b>6.2.9 Environmental Statement - Chapter 9 Ecology and Biodiversity [APP-047]</b>, with extensive mitigation measures the identified (in Section 9.6 and 9.7) to minimise these effects. These mitigation measures are further outlined in <b>7.17 Outline Ecological Protection and Mitigation Strategy [APP-326]</b> – particularly Section 2.4, Section 6 and Section 11. It is acknowledged that, due to the length of the cable route corridor, some adverse short to medium term impacts on the hedgerows and associated drainage ditches will occur in order to facilitate</p>



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>the trenching works. However, use of Horizontal Directional Drilling techniques will ensure that all impacts upon hedgerows, trees and watercourses assessed to be of elevated ecological importance (streams, rivers, species-rich and ecologically important hedgerows and mature trees) will be avoided entirely. This will be secured through the enactment of the final Ecological Protection and Mitigation Strategy together with <b>WB7.15_A Crossing Schedule Revision A [AS-001]</b> which details the location of all features to be crossed using HDD. A detailed Ecological Protection and Mitigation Strategy has been secured via Requirement 8 in Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p> <p>It is therefore only the remaining species-poor and intensively managed hedgerows which stand to be directly impacted by open cut trenching. These removed sections will be relatively short (approximately up to 6.5m each). In addition, cabling works are temporary and progressive meaning that restoration and replanting will follow once works in each section is complete which is set out within the <b>7.17 Outline Ecological Protection and Mitigation Strategy [APP-326]</b>. Residual impacts on these hedgerows have been assessed as being adverse in the short and medium term (significant at Site level only),</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>and neutral in the long term, see Paragraph 9.7.53 of <b>6.2.9 Environmental Statement - Chapter 9 Ecology and Biodiversity [APP-047]</b>.</p> <p>Habitats within fields which will be impacted by the cabling works have been assessed as being of lower ecological importance since the route itself has been carefully designed to avoid all nearby Local Wildlife Sites and as much priority habitat as possible. See <b>6.3.9.4 Environmental Statement - Appendix 9.4 Cable Route Preliminary Ecological Assessment [APP-080]</b>. Full details of replanting and reseeding will be provided within the finalised Ecological Protection and Mitigation Strategy.</p>
BPM-15	Alternatives and Design Evolution	Brownfield Sites	"Brownfield site alternatives should be used: Where is the definitive evidence to support using greenfield sites in the Trent Valley instead of alternative brownfield sites?"	<p>Section 3.3 of <b>7.11 Statement of Need [APP-320]</b> describes Government's view that large capacities of low-carbon generation will be urgently required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar".</p> <p>Section 7.6 <b>[APP-320]</b> analyses the potential contribution of "brownfield" solar sites to the national need for solar generation. Brownfield sites, including rooftop and other community energy systems, are likely to grow in the UK and will make a contribution to the decarbonisation of</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>the UK energy system. However, the Statement of Need concludes that on their own, brownfield developments are unlikely to be able to meet the national need for solar. Section 8.5 of the Statement of Need describes and agrees with Government's view that decentralised and community energy systems are unlikely to lead to the significant replacement of large-scale infrastructure. It is the Applicant's view (and this aligns with Government's view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p>
BPM-16	Principle of Development Other Environmental Matters (Human Health)	Impacts on Residential Amenity and Wellbeing	"Disturbance to residents and their wellbeing: The application has caused anxiety, distress and alarm to residents affected by the proposal and there should be questions asked about how this has been assessed and what measures need putting in place to address this issue."	<p>The Applicant acknowledges this comment but is confident that the level of consultation undertaken, and information presented throughout the pre-application stage was in accordance with the Planning Act 2008 and associated guidance. This has been evidenced in <b>5.1 Consultation Report [APP-022]</b>, which was submitted to the Planning Inspectorate and accepted for examination.</p> <p>For example, as described in Chapter 2 <b>[APP-022]</b>, the Applicant undertook two phases of community consultation to share information and invite feedback at different stages of Scheme development.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>The Applicant seeks to assure members of the community that the mitigation measures referred to throughout the Environmental Statement <b>[APP-039 to APP-061]</b> are controlled through the following documents:</p> <ul style="list-style-type: none"> <li>• <b>7.1_A Outline Construction Environmental Management Plan Revision A [EN010132/EX1/WB7.1_A];</b></li> <li>• <b>7.2 Outline Decommissioning Statement [APP-310];</b></li> <li>• <b>7.3_A Outline Landscape and Ecological Management Plan Revision A [EN010132/EX1/WB7.3_A];</b></li> <li>• <b>7.14_A Outline Operational Environmental Management Plan Revision A [EN010132/EX1/WB7.14_A];</b> and</li> <li>• Any other document secured through the draft DCO.</li> </ul> <p>These documents are secured by their respective Requirements in Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p>
BPM-17	Climate Change	Resource Use and Embodied Carbon Footprint	"Scale of resources needed to develop the sites: The scale of resources needed for the proposals are huge and the Carbon Footprint calculations	The 'Carbon Footprint' or embodied carbon calculations are included within Section 7.8 <b>Environmental Statement Chapter 7 – Climate</b>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			need investigating in depth for an informed judgement on benefit to be made."	<b>Change</b> with the assumptions used for calculations included.
BPM-18	Transport and Access	Access to WB1	"Transportation and access needed to develop the sites: The movement of resources needed for the proposals are of serious concern. The chosen access route for the WB1 site is not the best option and is unsuitable. Current plans would impact detrimentally on the movement of traffic through Broxholme."	<p>An Outline Construction Traffic Management Plan (CTMP) has been prepared to support the application at <b>6.3.14.2_A Environmental Statement - Appendix 14.2 Construction Traffic Management Plan Revision A [EN010132/EX1/WB6.3.14.2_A]</b>.</p> <p>The outline CTMP submitted as part of the DCO application provides a framework for the management of construction vehicle movements to and from the Scheme, to ensure that the effects of the temporary construction phase on the local highway network are minimised and made acceptable. <b>6.3.14.2_A Environmental Statement - Appendix 14.2 Construction Traffic Management Plan Revision A [EN010132/EX1/WB6.3.14.2_A]</b> covers:</p> <ul style="list-style-type: none"> <li>Construction methodology;</li> <li>Site access;</li> <li>Construction vehicle trip generation;</li> <li>Construction vehicle routing;</li> <li>Abnormal load movement; and</li> <li>Mitigation and management measures.</li> </ul> <p>Access to West Burton 1 is via the A1500 and the unnamed road to the south which connects to</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>Broxholme. Through the DCO, and in liaison with Lincolnshire County Council, pass-by bays will be provided to support the low level of daily HGV deliveries (five per day on average). No construction vehicles will travel through Broxholme.</p>

**Table 2.4.4: Applicant's Response to Fillingham Parish Meeting [RR-091]**

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
FPM-01	Climate Change Energy Need General	Contribution to decarbonisation	"Fillingham Parish Meeting (FPM) is against the proposed West Burton Solar Project large-scale development, because of its limited contribution to decarbonisation and the adverse consequences arising from using land in this way."	<p>Section 3.3 of <b>7.11 Statement of Need [APP-320]</b> describes Government's view that large capacities of low-carbon generation will be urgently required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar".</p> <p>It is the Applicant's view (and this aligns with Government's view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p> <p>Section 7 of <b>7.5 Planning Statement [APP-313]</b> concludes with a consideration of the Planning Balance and justifies how the overwhelming national need, as demonstrated in the Statement of Need outweighs any potential significant adverse impacts which, as the <b>Environmental Statement [APP-039 to APP-061]</b> sets out, are limited.</p>
FPM-02	General (Consultation)	Adequacy of Consultation	"The Public Consultation was so insufficient and inadequate as to be ineffective and the level of general understanding in the community of the scale and impact of the schemes remains very low."	<p>The Applicant acknowledges this comment but remains confident that the level of consultation undertaken and information presented throughout the pre-application stage is in accordance with the Planning Act 2008 and associated guidance. This has been evidenced in <b>WB5.1 Consultation Report [APP-022]</b>, which</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>was submitted to the Planning Inspectorate and accepted for examination.</p> <p>For example, as described in Chapter 2 of <b>C5.1 Consultation Report [APP-022]</b>, the Applicant undertook a series of community consultation phases to share information and invite feedback at different stages of Scheme development.</p> <p>Chapter 7 of <b>C5.1 Consultation Report [APP-022]</b> describes the Applicant's approach to statutory consultation, including consulting with relevant authorities on a draft Statement of Community Consultation. Table 7.1 sets out the comments received from authorities on the Applicant's approach to consultation and how these were considered by the Applicant. Table 7.3 in Chapter 7 describes how the Applicant complied with commitments made in the Statement of Community Consultation when undertaking statutory consultation.</p> <p>Chapter 8 of <b>C5.1 Consultation Report [APP-022]</b> describes how the Applicant undertook a six-week statutory phase two consultation on the Scheme, during which the Applicant presented consultees with environmental information sufficient for consultees to understand the potential likely significant effects of the Scheme in a Preliminary Environmental Impact Report (PEIR). A non-technical summary was published to</p>



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>accompany the PEIR, with public information events and free-to-use communications channels open to help aid accessibility and understanding of the Scheme. A Consultation Summary Report for this phase of statutory consultation was published on the dedicated Scheme website, shared with elected representatives and stakeholders and issued to over 9,000 properties within the vicinity of the Scheme, to help consultees understand how their feedback was being considered. A copy of the Phase Two Consultation Summary Report is provided as <b>WB5.7 Appendix 5.7: Phase Two Community Consultation Materials [APP-029 to APP-031]</b>.</p> <p>Chapter 11 of <b>WB5.1 Consultation Report [APP-022]</b> describes the significant volume of responses received to Section 47 consultation (local community), including the issues raised and how these were considered by the Applicant. This is further evidenced by <b>WB5.12 Appendix 5.12: Consultation Report Appendix – Section 47 Applicant Response [APP-036]</b>.</p> <p>The host authorities have confirmed that the statutory consultation process was adequate through their <b>Adequacy of Consultation Representations [AoC-001 to AoC-013]</b>.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
FPM-03	Principle of Development  Landscape and Visual Impact	Scale and Visual Impact of the Scheme	"The scale of the IGP West Burton Solar Project would change the visual aspect and character of the region, which would undoubtedly be dominated by solar fields – at 4.5m panels could never be adequately screened by hedgerows (at all) or by trees (for many years), ruining much loved views, walks and historic landscapes."	<p>The effects of scale and visual impact of the Scheme have been taken into consideration in the assessment of both the landscape and visual effects, which is set out within the <b>6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> (the 'LVIA'). The detailed assessment information can be found within the individual receptor sheets at <b>6.3.8.2 Environmental Statement - Appendix 8.2 Assessment of Potential Landscape Effects [APP-073]</b> and <b>6.3.8.3 Environmental Statement - Appendix 8.3 Assessment of Potential Visual Effects [APP-074]</b>.</p> <p>The iterative design process has taken account of the individual elements of the Scheme such as the panels, fencing, battery storage, substations and access arrangements to ensure the best possible fit with the landscape. The photography and photomontage information at <b>6.4.8.13.1 to 6.4.8.13.71 Environmental Statement - Figure 8.13.1 to 8.13.71 [APP-194 to APP-264]</b> show how the fencing is integrated. For example, <b>6.4.8.13.26 Environmental Statement - Figure 8.13.26 Viewpoint 26 Photography and Photomontage [APP-219]</b> shows the fencing and panels set back from the highway and also from the existing and proposed hedgerows to allow for the proposed thickening and growth of new hedgerows. The</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>photomontages also show how the planting mitigation has been designed to enhance the landscape character of this location with new native tree and shrub planting, improvements to existing hedgerows and new hedgerows.</p> <p>The LVIA also sets out landscape mitigation measures that have been designed to avoid and reduce the likely adverse significant effects anticipated from the Scheme. These mitigation measures are set out in <b>7.3_A Outline Landscape and Ecological Management Plan Revision A [EN010132/EX1/WB7.3_A]</b> and will be secured through Requirement 7 in Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p>
FPM-04	Principle of Development	Cumulative Impacts and Joint Examination	<p>"The unprecedented situation of the four massive NSIP solar projects within such a close area means that to properly understand the implications on the region, all the projects should be considered together by the Planning Inspectorate, i.e. Cottam Solar Project, West Burton Solar Project, Gate Burton Energy and Tillbridge Solar."</p>	<p>The Applicant notes this comment and seeks to assure the Interested Party that a cumulative effects assessment has been prepared for the Application within the <b>Environmental Statement [APP-039 to APP-061]</b>.</p> <p>Cumulative effects assessments for each environmental topic are set out in each of the ES Chapters and include the assessment of the impacts of the Scheme cumulatively with the Gate Burton Energy Park, Cottam Solar Project and Tillbridge Solar Project (see paragraph 2.5.9 of <b>6.2.2 Environmental Statement - Chapter 2 EIA Process and Methodology [APP-040]</b>).</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				This assessment has been carried out in accordance with Schedule 4 of the 2017 EIA Regulations and PINS Advice Note 17. The mitigation measures set out across the ES therefore account for anticipated cumulative effects.
FPM-05	Landscape and Visual Impact  Socio-economics, Tourism and Recreation  Other Environmental Matters (Human Health)  Transport and Access	Health and Wellbeing	"FPM is concerned that the scale of the WBSP will have a massively harmful impact on the health and wellbeing of residents, in particular their mental health, by removing visual amenity, changing views, and causing stress by destroying agricultural jobs and livelihoods, as well as disruption during construction and decommissioning."	<p><b>6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> (the 'LVIA') includes a full and detailed assessment that deals with both effects on the landscape itself and effects on the visual amenity of people, as well as interrelationships of these with other related topics in the ES. The LVIA process is iterative and as a result, the design of the Scheme has changed to respond to the findings of the assessment to ensure that landscape mitigation is fully considered as part of the process.</p> <p>For example, the LVIA mitigation has had regard to the need to consider the landscape character and visual amenity for the users of PRoW. This is set out in <b>6.3.8.3 Environmental Statement - Appendix 8.3 Assessment of Potential Visual Effects [APP-074]</b>. Public Rights of Way Receptor PR006 (Brox/198/1) on pp.907-909 <b>[APP-074]</b> shows in this instance that the Embedded Mitigation would include panels set a minimum of 15m from the adjacent PRoW. Secondary Mitigation would also be implemented,</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>comprising of native hedgerows within and on the boundaries of the West Burton 1 Site being retained and reinforced with new native trees. Hedgerows would also be maintained at a taller height (c5m). The landscape proposals include for a new native woodland shelterbelt and scattered trees along the southern boundary of the WB1 Site. Once established, these measures, combined with the additional tree planting across the Site, would help break up the views of the Array, substation and associated infrastructure. During the spring and summer, when the vegetation is out in leaf, the hedgerows and trees would soften and filter views. Available views would be limited to transient views through gate entrances and over low hedgerows.</p> <p>The Applicant is cognisant of the significance of the countryside for physical and mental wellbeing and, as such, likely impacts on the desirability and use of recreational facilities in the countryside, such as public rights of way, have been assessed in Section 18.7 of <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b>. The greatest level of effect to access, desirability and use of recreational facilities is limited to short- to medium-term moderate adverse effects on long distance recreational routes (the Trent Valley Way and National Byways) during construction (see</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>Table 18.15 and para. 18.7.62). This is a <b>significant adverse</b> effect. This is however the only significant effect anticipated, with no greater than moderate-minor adverse anticipated to any other recreational receptor during construction (see paras. 18.7.60 to 18.7.69), or to any recreational receptor during operation (see paras. 18.7.107 to 18.7.117) and decommissioning (see paras. 18.7.147 to 18.7.157). These effects are not anticipated to be significant.</p> <p>This is re-iterated in Section 21.5 of <b>6.2.21 Environmental Statement - Chapter 21 Other Environmental Matters [APP-059]</b>.</p> <p>The Applicant recognises the significance of the agricultural industry in the local economy and has assessed the economic impact of the Scheme in Section 18.7 of <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b> and the direct impacts on local agriculture in Sections 19.9 and 19.10 of <b>6.2.19 Environmental Statement - Chapter 19 Soils and Agriculture [APP-057]</b>.</p> <p>The Scheme is anticipated to lead to a maximum loss of approximately 13 full-time equivalent agriculture jobs, as stated in paragraph 18.7.15 of document <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and</b></p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p><b>Recreation [APP-056].</b> The Scheme is estimated to employ 8 full-time equivalent employees from the local area during operation; see Table 18.16. The net change in employment in the local area (defined as West Lindsey and Bassetlaw Districts) during the Scheme's operational life is a loss of approximately 2 full-time jobs, once consideration of direct, indirect and induced employment, and impacts on the tourism and recreation industry is taken into account (see para. 18.7.81). Overall, the economic benefit to the local area is estimated to be £1.5 million per year (see para. 18.7.99).</p> <p>The overall employment and economic benefit to the local area from the two-year construction period is anticipated to be 432 full-time equivalent jobs (see para. 18.7.23), generating £20.0 million per year (see para. 18.7.52).</p> <p>The land included in the Scheme covers 4 farm businesses, all of which are owner occupiers of the land within the Sites comprising the Scheme. This is detailed in full in para. 7.1.1-29 of <b>6.3.19.1 Environmental Statement - Appendix 19.1 Agricultural Land Quality, Soil Resources and Farming Circumstances Report [APP-137]</b>.</p> <p>The Applicant seeks to assure members of the community that the mitigation measures referred to throughout the Environmental Statement</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>[APP-039 to APP-061] to limit impacts from the construction and decommissioning of the Scheme are controlled through the following documents:</p> <ul style="list-style-type: none"> <li>• <b>7.1_A Outline Construction Environmental Management Plan Revision A</b> [EN010132/EX1/WB7.1_A];</li> <li>• <b>6.3.14.2_A Environmental Statement - Appendix 14.2 Construction Traffic Management Plan Revision A</b> [EN010132/EX1/WB6.3.14.2_A];</li> <li>• <b>6.3.14.3_A Environmental Statement - Appendix 14.3 Outline Public Rights of Way Management Plan Revision A</b> [EN010132/EX1/WB6.3.14.3_A];</li> <li>• <b>6.3.19.2 Environmental Statement - Appendix 19.2 Outline Soil Management Plan</b> [APP-138];</li> <li>• <b>7.10 Outline Skills Supply Chain and Employment Plan</b> [APP-319]; and</li> <li>• <b>7.2 Outline Decommissioning Statement</b> [APP-310].</li> </ul> <p>These documents are secured by Requirements 13, 15, 18, 19, 20, and 21 respectively in Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A</b> [EN010132/EX1/WB3.1_A].</p>



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
FPM-06	Socio-economics, Tourism and Recreation  Landscape and Visual Impact	Desirability/ Attractiveness of Village	"As a small, rural community, Fillingham has few opportunities for employment and very few amenities – one of its few attractions is the open countryside landscape that it sits in. The scale of the WBSP would deny the village of this one key attribute and erode the attractiveness of the village and therefore the village's capacity to sustain itself; driving some people away and serving to deter people from moving in – the village could die."	<p>The likely impacts on the desirability and use of the area surrounding the Scheme for tourism and recreation have been assessed in Section 18.7 of <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b>.</p> <p>The greatest effect during construction is anticipated to be a peak medium-term temporary moderate adverse on the landscape setting of tourism attractions (see para. 18.7.57), which is a <b>significant adverse</b> effect. During operation, the greatest effects to tourism and recreation receptors are anticipated to be long-term moderate-minor adverse (see para. 18.7.101), which is not considered to be significant.</p> <p><b>6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> (the 'LVIA') takes into account the effects on residential receptors and this includes singular buildings, groups of buildings and towns or villages such as Fillingham. Table 8.20 of the LVIA sets out the selection of initial residential receptors for the purpose of the assessment and the reason for their selection are those receptors within the 1km Study Area for the Scheme and the 0.5km Study Area from the outer boundary of the Cable Route Corridor. The settlement of Fillingham does not fall within the initial selection</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				and has therefore not been considered further within the LVIA.
FPM-07	Landscape and Visual Impact  Socio-economics, Tourism and Recreation  Transport and Access	Use of Public Rights of Way	"For many people living in and around Fillingham, the local network of footpaths, roads and bridleways provides their routes for recreation and exercise, such as cycling, walking, running and horse-riding – and the benefit of being in the fresh air, surrounded by greenery. Such benefit will be lost through the extensive development of the WBSP."	<p><b>6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> (the 'LVIA') takes into account the effects on PRoW receptors and this includes those that pass close villages such as Fillingham. Table 8.24 of the LVIA sets out the selection of initial PRoW receptors for the purpose of the assessment and the reason for their selection are those receptors within the 2km Study Area for the Scheme and the 0.5km Study Area from the outer boundary of the Cable Route Corridor. The PRoW around the settlement of Fillingham do not fall within the initial selection and have therefore not been considered further within the LVIA.</p> <p>The Applicant is cognisant of the significance of the countryside for physical and mental wellbeing and, as such, likely impacts on the desirability and use of recreational facilities in the countryside, such as public rights of way, have been assessed in Section 18.7 of <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b>. The greatest level of effect to access, desirability and use of recreational facilities is limited to short- to medium-term moderate adverse effects on long distance recreational routes (the Trent Valley Way and National Byways) during construction (see</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>Table 18.15 and para. 18.7.62). This is a <b>significant adverse</b> effect. This is however the only significant effect anticipated, with no greater than moderate-minor adverse anticipated to any other recreational receptor during construction (see paras. 18.7.60 to 18.7.69), or to any recreational receptor during operation (see paras. 18.7.107 to 18.7.117) and decommissioning (see paras. 18.7.147 to 18.7.157). These effects are not anticipated to be significant.</p> <p>This is re-iterated in Section 21.5 of <b>6.2.21 Environmental Statement - Chapter 21 Other Environmental Matters [APP-059]</b>.</p>
FPM-08	Socio-economics, Tourism and Recreation	Local Rural Employment	"There are few employment opportunities within the immediate area of Fillingham, but the West Burton Solar Project will adversely impact agricultural jobs and provide few opportunities for livelihoods in their place."	<p>The Applicant recognises the significance of the agricultural industry in the local economy and has assessed the economic impact of the Scheme in Section 18.7 of <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b> and the direct impacts on local agriculture in Sections 19.9 and 19.10 of <b>6.2.19 Environmental Statement - Chapter 19 Soils and Agriculture [APP-057]</b>.</p> <p>The Scheme is anticipated to lead to a maximum loss of approximately 13 full-time equivalent agriculture jobs, as stated in paragraph 18.7.15 of document <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and</b></p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p><b>Recreation [APP-056].</b> The Scheme is estimated to employ 8 full-time equivalent employees from the local area during operation; see Table 18.16. The net change in employment in the local area (defined as West Lindsey and Bassetlaw Districts) during the Scheme's operational life is a loss of approximately 2 full-time jobs, once consideration of direct, indirect and induced employment, and impacts on the tourism and recreation industry is taken into account (see para. 18.7.81). Overall, the economic benefit to the local area is estimated to be £1.5 million per year (see para. 18.7.99).</p> <p>The overall employment and economic benefit to the local area from the two-year construction period is anticipated to be 432 full-time equivalent jobs (see para. 18.7.23), generating £20.0 million per year (see para. 18.7.52).</p> <p>The land included in the Scheme covers 4 farm businesses, all of which are owner occupiers of the land within the Sites comprising the Scheme. This is detailed in full in para. 7.1.1-29 of <b>6.3.19.1 Environmental Statement - Appendix 19.1 Agricultural Land Quality, Soil Resources and Farming Circumstances Report [APP-137]</b>.</p>
FPM-09	Cultural Heritage	Impact on Heritage Assets	"Fillingham is part of an area of villages and agriculture that with a long history. Fillingham St Andrew's church is referenced in the Domesday	The Applicant respectfully disagrees with this conclusion.

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>Book. The long heritage and character of the area would be shattered by development at the scale of the WBSP and other NSIP solar developments."</p>	<p><b>6.3.13.5 Environmental Statement - Appendix 13.5 Heritage Statement [APP-117 to APP-119]</b>, provides a detailed assessment of all Grade II Listed Buildings and Conservation Areas within 2km of the Scheme, and all Grade I and II* Listed Buildings and Scheduled Monuments within a 5km study area surrounding the Scheme. Fillingham parish is located almost wholly outside of the 5km study area for the Heritage Statement, and none of the heritage assets within Fillingham would be affected by the West Burton scheme.</p> <p><b>6.2.13 Environmental Statement - Chapter 13 Cultural Heritage [APP-051]</b> also provides an assessment of potential impacts caused by the Scheme upon archaeological remains and Historic Landscape Character (HLC). All of the identified impacts are located within the West Burton Order Limits and do not extend into the parish of Fillingham.</p> <p>Whilst one of the of the other NSIP solar developments considered as part of the cumulative assessment in the EIA is located within Fillingham parish (the Cottam Scheme), the West Burton Order Limits are sufficiently distant from Fillingham so that there would be no additional cumulative impacts to the historic landscape character of Fillingham or any of the heritage assets within the parish as a result of the</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				West Burton Scheme (see section 13.10 <b>[APP-051]</b> ).
FPM-10	Principle of Development	Definition of Temporary and Lifetime of Scheme	"IGP repeatedly uses the technical definition of "temporary" to hide the nature of the project. Between construction, operation and decommissioning, a life cycle of c. 50 years does not reasonably constitute "temporary" in a human lifetime. The developer should be consistent and honest with the public about the lifetime of the scheme."	<p>Once the Scheme ceases to operate, it will be decommissioned.</p> <p>Decommissioning is estimated to be no earlier than 2066 (see paras. 3.3.15 to 3.3.18 of <b>7.5 Planning Statement [APP-313]</b>).</p> <p>Decommissioning is expected to take between 12 and 24 months. A 24-month decommissioning period has been assumed for the purposes of a worst-case assessment in the ES, (See paragraph 4.3.6 of <b>6.2.4 Environmental Statement - Chapter 4 Scheme Description [APP-042]</b>). In addition, the agricultural land can remain in productive use through the operational period, by, for example, being grazed by livestock (see paras 19.10.2, 19.10.6, 19.10.10 of <b>6.2.19 Environmental Statement - Chapter 19 Soils and Agriculture [APP-057]</b>).</p>
FPM-11	Ecology and Biodiversity	Impacts on Existing Habitats	"Existing habitats rich with birds of prey, owls and scarce farmland species, plus deer, brown hares and badgers will be disturbed through the massive scale of construction activities and material movements the West Burton Solar Project will require, and will be impacted through the project's operational lifetime and decommissioning."	Section 9.6 of <b>6.2.9 Environmental Statement - Chapter 9 Ecology and Biodiversity [APP-047]</b> sets out the extensive findings of all ecological investigations undertaken within the Order Limits together with an appraisal of the relative importance of each species or species group, habitat or designated site. A comprehensive package of mitigation measures has been identified, in tandem with embedded mitigation

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>(see Section 9.6) which is secured through the ecologically sensitive design of the Scheme (and includes measures such as the wide buffering of all field boundaries and the use of existing hedgerow gaps for accesses). These measures have been further detailed within <b>7.17 Outline Ecological Protection and Mitigation Strategy [APP-326]</b> and <b>7.3_A Outline Landscape and Ecological Management Plan Revision A [EN010132/EX1/WB7.3_A]</b> which will ensure that all identified impacts are minimised as far as possible. In many cases, the reversion from intensive agriculture to pasture or meadow grassland with additional hedgerow, scrub, tree and wetland habitat creation will bring about positive effects for wildlife. In particular, terrestrial and aquatic invertebrates, botanical diversity, small mammals and many species of bird all stand to benefit as set out in Section 9.7 in <b>6.2.9 Environmental Statement - Chapter 9 Ecology and Biodiversity [APP-047]</b>.</p> <p>More specifically, in our experience of monitoring over 100 active solar arrays, we find that brown hare and badgers are highly active on solar arrays owing to the improved foraging habitat within them. Birds of prey, including owls, are one species group likely to benefit from the provision of large areas of optimal habitat for small mammals such as field voles which require</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>tussocky and dense grassland which will be created within buffered field boundaries.</p> <p>Construction activities will be temporary, and since they are limited primarily to the piling of metal supports into the ground and laying of electrical cabling, they are not considered to create a level of disturbance which significantly exceeds that generated by typical agricultural sowing, spraying and harvesting operations. The control of construction activities is managed through <b>7.1 Outline Construction Environmental Management Plan [EN010132/EX1/WB7.3_A]</b> and secured by <b>Requirement 13</b> in Schedule 2 in the <b>dDCO [EN010132/EX1/WB3.1_A]</b>.</p>
FPM-12	Hydrology, Flood Risk and Drainage	Increased Risk of Surface Water Flooding	"There is a real risk for a significant increase in water run-off from the huge surface area of solar panels, leading to increased risk of flooding, damage and isolation of properties and communities."	<p>As stated in paragraph 10.8.19 and 10.8.20 of 6.2.10 Environmental Statement - Chapter 10 Hydrology Flood Risk and Drainage [APP-048] maintaining the existing surface water run-off regime by utilising permeable surfacing for the Sites' accesses, linear infiltration trenches around any proposed infrastructure (substations and batteries) and wildflower planting at the leeward edge of solar panels will ensure that the Scheme is unlikely to generate surface water runoff rates beyond the baseline scenario.</p> <p>As stated in <b>6.3.10.1 Environmental Statement - Appendix 10.1 Flood Risk Assessment and</b></p>



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p><b>Drainage Strategy Report [APP-089]</b>, any runoff from hardstanding/small buildings on the Scheme Sites will be captured on site, to prevent increasing runoff from the Sites.</p> <p>Provision of a full surface water drainage scheme is secured by Requirement 11 in Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p>
FPM-13	Transport and Access	Suitability of Local Road Network	"The largest road near Fillingham is a "B" road, and most others are single-track roads, which are wholly unsuitable to the large volumes of traffic movements necessary to construct and decommission the WBSP."	<p>Construction vehicles associated with the West Burton Scheme will not travel on local roads near Fillingham.</p> <p>Information on the construction vehicle routes is set out in <b>6.3.14.1_A Environmental Statement - Appendix 14.1 Transport Assessment Revision A [EN010132/EX1/WB6.3.14.1_A]</b>.</p>
FPM-14	Other Environmental Matters (Human Health / Major Accidents and Disasters) Air Quality Ecology and Biodiversity	BESS Fire Safety Impacts	"The fire safety and environmental risk arising from the failure of batteries is a concern, including how community safety and environmental integrity of wildlife and water systems would be ensured in an emergency."	<p>The Applicant has submitted <b>7.9 Outline Battery Storage Safety Management Plan [APP-318]</b> and, through <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>, has secured by Requirement 6 of Schedule 2 that "Work No. 2 must not commence until a battery storage safety management plan has been submitted to and approved by the relevant planning authority."</p> <p>Paragraph 4.1.18 of <b>7.9 Outline Battery Storage Safety Management Plan [APP-318]</b> explains that the design of the BESS has integrated fire</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
	Hydrology, Flood Risk and Drainage			<p>detection and suppression systems that will automatically operate to contain battery fires. Paragraph 5.3 states that if fire spreads to multiple units, external firefighting water facilities are available by means of 228,000 litre water storage tanks within the battery compounds.</p> <p>Human health and other environmental impacts resulting from plumes from potential battery fires have been initially assessed in <b>6.2.17 Environmental Statement - Chapter 17 Air Quality [APP-055]</b> and are proposed to be supplemented by additional information during the examination process.</p> <p>Risks to human health as a result of fires or unconfined explosions within the BESS compound are set out in paragraphs 21.6.42 to 21.6.48 of <b>6.2.21 Environmental Statement - Chapter 21 Other Environmental Matters [APP-059]</b> which concludes that there is no significant risk of harm to human health due to the physical separation of the BESS compound from publicly accessible areas.</p> <p>As addressed in paragraphs 10.8.11 – 10.8.14 of <b>6.2.10 Environmental Statement – Chapter 10 Hydrology, Flood Risk and Drainage [APP-048]</b>, and section 3.10 of Appendix 10.5 of <b>6.3.10.5 Environmental Statement - Appendix 10.5 FRA DS West Burton 3 [APP-093]</b> given the nature of</p>

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				<p>the energy storage within the Scheme, there is a potential risk of fire which could result in the mobilisation of pollution within surface water run-off. It is proposed that runoff from the energy storage area will be contained by local bunding and attenuated within gravel subgrade of lined permeable SuDS features prior to being passed forward to the local land drainage network. In the event of a fire, a system of automatically self-actuating valves at the outfalls from the battery storage areas will be closed, isolating the battery storage area's drainage from the wider environment. As per paragraph 10.8.12 of <b>6.2.10 Environmental Statement - Chapter 10 Hydrology, Flood Risk and Drainage [APP-048]</b> and paragraph 3.10.5 of <b>6.3.10.5 Environmental Statement - Appendix 10.5 FRA DS West Burton 3 [APP-093]</b>. The water contained by the valves will be tested and either treated and released or tankered off-site as necessary and in consultation with the relevant consultees (including but not limited to Lincolnshire County Council, as Lead Local Flood Authority, and the Environment Agency) at the time.</p>
FPM-15	Principle of Development	Securing of Decommissioning	"Fillingham Parish Meeting is concerned that the standards the developer would be held to at the end of the life of the project are not clear."	<b>7.2 Outline Decommissioning Statement [APP-310]</b> forms part of the Application. Paragraphs 2.1.1 to 2.1.8 set out decommissioning activities for the removal of all the solar panels (PV),

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>structures, enclosures, equipment, and all other apparatus associated with the Scheme.</p> <p>The Applicant confirms that the following is secured through Requirement 21 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>: "Within 12 months of the date that the undertaker decides to decommission any part of the authorised development, the undertaker must submit to the relevant planning authority for that part a decommissioning plan for approval" where "The decommissioning plan must be substantially in accordance with the outline decommissioning statement."</p> <p><b>7.2 Outline Decommissioning Statement</b> [APP-310] explains in paragraph 1.2.1 that a Decommissioning Environmental Management Plan (DEMP) (or multiple DEMPs) and a Decommissioning Traffic Management Plan (DTMP) will be produced and approved for the Scheme following the appointment of a contractor, prior to the commencement of the decommissioning phase of the Scheme. Approval and implementation of the DEMP and the DTMP will be secured through a Requirement of the DCO.</p> <p><b>7.2 Outline Decommissioning Statement</b> [APP-310] sets out the principles of decommissioning</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>and environmental considerations (see paras. 2.1.1 to 2.1.8) and provides a summary of potential mitigation and management measures during decommissioning in Table 3.1. It also sets out how roles, responsibilities and actions required in respect of implementation of the mitigation measures will be managed, along with principles for monitoring and reporting. Further details will be provided in the final DEMPs and DTMP submitted for approval prior to decommissioning. The commitment for the final DEMP and DTMP to be substantially in accordance with the Outline Decommissioning Statement.</p> <p>In addition, to restore the land to its pre-construction condition at the end of operation, the soil resource within the Order Limits will be managed through construction, operation, and decommissioning. <b>6.3.19.2 Environmental Statement Appendix 19.2 Outline Soil Management Plan [APP-138]</b> is included in the Application and it identifies measures to be implemented, through the general principles outlined in paragraph 3.1.1, to ensure the protection and conservation of soil resources maintains the physical properties of the soils during all phases of the Scheme and following decommissioning. On site information relating to the management of soil resources will be</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>provided to the Site operators undertaking the works.</p> <p>A Soils Resource Management Plan, substantially in accordance with <b>6.3.19.2 Environmental Statement Appendix 19.2 Outline Soil Management Plan [APP-138]</b> will be submitted and approved prior to the commencement of development as secured by Requirement 19 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p> <p>In combination, the above measures are considered to provide sufficient clarity to ensure that decommissioning of the Scheme will be undertaken to a high standard.</p>
FPM-16	General	The Applicant	<p>"Fillingham Parish Meeting is concerned that IGP has no track record of development at this scale, in particular to be able to fulfil the obligation for decommissioning and restoration of land at the end of the project lifecycle, which could leave the community with a significant liability to restore the land to a useful purpose."</p>	<p>The Applicant is part of Island Green Power Limited (IGP), a leading international developer of renewable energy projects, established in 2013. Further information on the Applicant can be found in the <b>4.2 Funding Statement [APP-020]</b> that has been submitted as part of the DCO Application.</p> <p>IGP has delivered 26 solar projects worldwide totalling more than 1GW of capacity. This includes 14 solar projects in the UK and Republic of Ireland.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				Please see response FPM-15 above for further details regarding decommissioning.
FPM-17	Energy Need Climate Change	Energy Benefits	"The energy and decarbonisation benefits made by IGP for the West Burton Solar Project are oversimplified, overstated and misleading."	<p>Section 3.3 of <b>7.11 Statement of Need [APP-320]</b> describes Government's view that large capacities of low-carbon generation will be urgently required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar".</p> <p>It is the Applicant's view (and this aligns with Government's view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p> <p>Figure 7.3 <b>[APP-320]</b> shows that generating power from solar capacity which grows in line with "Future Energy Scenario" projections will provide cumulative carbon emissions benefits versus if that solar capacity growth was not delivered, and instead power was generated from conventional (higher carbon intensity) sources (e.g. Combined Cycle Gas Turbines).</p> <p>The benefits of the Scheme, specifically in relation to carbon savings it would bring forwards, are presented in <b>6.2.7_A Environmental Statement - Chapter 7 Climate Change Revision A [EN010132/EX1/WB6.2.7_A]</b>. This comparison accounts for the variation between use of solar</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>power compared to fossil fuels and also includes comparison with other renewable energy production methods.</p> <p>Section 7.4 of <b>7.11 Statement of Need [APP-320]</b> provides evidence to support that wider decarbonisation of the UK's electricity sector requires large capacities of solar generation to be developed.</p> <p>Figures 8.1 and 8.2 <b>[APP-320]</b> demonstrate over longer time periods how wind and solar are likely to complement each other in the provision, alongside other technologies, of a reliable electricity supply to UK consumers.</p>
FPM-18	Energy Need Soils and Agriculture	Food versus Energy Need	<p>"FPM is concerned that in the wake of major disruption to food supplies in recent years, displacing productive arable land in the UK with solar panels that can make such a limited contribution to the country's energy needs, undermines the country's ability to source food locally and maintain food security."</p>	<p>Section 3.3 of <b>7.11 Statement of Need [APP-320]</b> describes Government's view that large capacities of low-carbon generation will be urgently required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar".</p> <p>It is the Applicant's view (and this aligns with Government's view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p> <p>Section 7.4 <b>[APP-320]</b> provides evidence to support that wider decarbonisation of the UK's</p>



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>electricity sector requires large capacities of solar generation to be developed.</p> <p>Figures 8.1 and 8.2 <b>[APP-320]</b> demonstrate over longer time periods how wind and solar are likely to complement each other in the provision, alongside other technologies, of a reliable electricity supply to UK consumers.</p> <p>Defra produce a UK food security report, the most recent of which was published in 2021. It notes that key risks to UK food security include climate change and soil degradation.</p> <p>Development of UK agricultural land is not noted among these risks. In addition to renewable energy, the Scheme is anticipated to enable the recovery of soil organic matter through the reversion of arable land to less intensive agricultural uses for the duration of the operation of the Scheme. For further details please see Paragraph 19.9.14 of <b>6.2.19 Environmental Statement - Chapter 19 Soils and Agriculture [APP-057]</b>.</p>
FPM-19	Energy Need Soils and Agriculture	Land Use	"There are many and increasing demands on the use of land, and in a situation of increasing pressure on land use, the West Burton Solar Project represents a highly inefficient use of land for the region – as well as for the country."	<p>The Applicant refers to its response to FPM-18 above.</p> <p>Further, the Applicant notes that Paragraph 7.6.8 of <b>7.11 Statement of Need [APP-320]</b> describes Government's anticipated range of 2 to 4 acres for each MW of output generally required for a solar farm along with its associated</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>infrastructure. The Scheme as proposed delivers a large-scale solar generation asset which is consistent with this range.</p> <p>Section 7.6 of the Statement of Need demonstrates that large-scale solar is the most efficient use of land for energy purposes.</p>
FPM-20	<p>Energy Need</p> <p>Principle of Development</p> <p>Alternatives and Design Evolution</p>	Alternative Sites	<p>"Fillingham Parish Meeting has joined with other local parishes to oppose the West Burton Solar Project, as the benefits of the development do not outweigh the harms – and there are credible alternatives that have not been adequately pursued."</p>	<p>The Applicant respectfully disagrees with the conclusion that the Application benefits do not outweigh its harms.</p> <p>Chapter 4 of <b>7.11 Statement of Need [APP-320]</b> sets out the UK's legal requirement to decarbonise and explains how that requirement has created an increased need and urgency to meet the UK's obligations under the Paris Agreement (2015) as detailed within para. 4.2.7. The chapter summarises the latest expert views on the urgency for and depth of low-carbon infrastructure needed to deliver the UK's Net Zero legal obligations, and demonstrates that there is an urgent need for the development of large-scale solar schemes.</p> <p>Paragraphs 6.2.17 to 6.2.19 of <b>7.5 Planning Statement [APP-313]</b> explain that it is against this backdrop that NPS EN-1 paragraph 4.1.2 sets a presumption in favour of granting permission for energy NSIP projects. This is carried through to Draft NPS EN-1 at paragraphs 4.1.2 to 4.1.5.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>Section 6.2 <b>[APP-313]</b> sets out how the Scheme will meet the compelling need for renewable energy in accordance with relevant national planning policies. In summary, the Scheme would:</p> <ul style="list-style-type: none"> <li>• Deliver a large amount of renewable generation capacity (35,590,658 MWh over the estimated 40-year assessed lifetime) (see para. 6.2.32) to deliver the Government's energy objectives and legally binding net zero commitments in line with the requirements of paragraph 1.1.1 of NPS EN-3 (see para. 6.2.3), paragraph 3.3.20 of draft NPS EN-1 (see para. 6.2.10), section 3.4 of NPS EN-1 and the National Infrastructure Strategy 2020;</li> <li>• Deliver a reduction of 5,974,155 tCO<sub>2</sub>e over the lifetime of the Scheme compared to if it did not go ahead (see para. 6.2.35) which would make a significant contribution towards reducing carbon emissions as required by paragraph 1.1.1 of NPS EN-1, paragraph 2.3.3 of Draft NPS EN-1, the National Infrastructure Strategy 2020 and the Energy White Paper: "Powering our net zero future";</li> <li>• Deliver in a timescale that is short in the context of the delivery of other forms of energy generation in line with the urgent</li> </ul>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>need to decarbonise set out in paragraphs 3.3.5, 3.3.15 (see para. 6.2.4) and 3.4.5 of NPS EN-1 (see para. 6.2.1), Paragraph 2.3.3 (see para. 6.2.8) of Draft NPS EN-1 and the National Infrastructure Strategy 2020;</p> <ul style="list-style-type: none"> <li>• Enable all consumers to benefit from the effect of low-marginal cost solar generation on reducing market prices, in line with the aim to provide affordable energy for consumers set out at Paragraph 2.3.3, Paragraph 2.3.6 and 3.3.20 of Draft NPS EN-1 (see paras. 6.2.8, 6.2.9 and 6.2.10) ;</li> <li>• Help ensure security and reliability of energy supply in line with Paragraph 2.3.2 and 2.3.5 of the Draft NPS EN-1.</li> </ul> <p>NPS EN-1 paragraph 3.2.3. and Draft NPS EN-1 paragraph 3.1.1, acknowledge that it will not be possible to develop the necessary amounts of such infrastructure to deliver these benefits without some significant residual adverse impacts as explained at paragraph 6.2.20 <b>[APP-313]</b>.</p> <p>Whilst it has not been possible for the Scheme to avoid all significant residual impacts, these have been identified within the <b>Environmental Statement [APP-039 to APP-061]</b> and have been minimised, where possible, through careful and</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>sensitive design and detailed mitigation strategies.</p> <p>Section 6 of <b>7.5 Planning Statement [APP-313]</b> demonstrates that when considered against national planning policies, the Scheme accords with the relevant policies, and with regard to specific policy tests, the substantial benefits of the Scheme are considered on balance to outweigh its limited number of significant residual adverse impacts. Therefore, it is considered that development consent for the Scheme should be granted.</p> <p>The Applicant respectfully disagrees that credible alternatives have not been adequately pursued. The consideration of alternatives has been undertaken within <b>6.2.5 Environmental Statement - Chapter 5 Alternatives and Design Evolution [APP-043]</b>. This includes the consideration of alternative sites (Section 5.5), alternative technologies (Section 5.6), alternative layouts (Section 5.7), alternative substation locations (section 5.8) and alternative cable routes (Section 5.9). The ES chapter <b>[APP-043]</b> concludes in paragraphs 5.10.2, 5.10.3 and 5.10.4 that alternative potential development areas did not perform as well as the Sites.</p> <p>The selection of the Scheme's location has followed a systematic step-by-step process as set</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>out in detail within <b>WB6.3.5.1_A Environmental Statement - Appendix 5.1 Site Selection Assessment Revision A [AS-004]</b>. This took a sequential approach to the consideration of potential sites in terms of agricultural land classification. As a result, paragraph 3.3.22 states that the Scheme maximises the utilisation of low grade, non-best and most versatile (BMV) agricultural land with 95.9% of the land being classified as non BMV land.</p> <p>Paragraphs 2.1.23 to 2.1.32 <b>[AS-004]</b> detail the consideration of brownfield land and roof tops and sets out why these were discounted as unsuitable. The methodology used for the site selection process is considered reasonable and proportionate and complies with the requirements of NPS EN-1 4.4.3.</p> <p>The land required for the Scheme has been demonstrated to perform better than 8 of the assessed Potential Development Areas (PDAs) and equal to the remaining one following the site selection process. Consequently, paragraphs 4.1.1 to 4.1.8 <b>[AS-004]</b> conclude that there are no obviously more suitable locations for the Scheme within the Search Area.</p>
FPM-21	Energy Need	Solar Land Use	"FPM believes that, given the pressure in the UK on land use, solar on commercial and domestic rooftops must be pursued as a matter of urgency	Section 3.3 of <b>7.11 Statement of Need [APP-320]</b> describes Government's view that large capacities of low-carbon generation will be urgently

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
	Alternatives and Design Evolution		before large areas of land are used for intermittent, low-load factor solar power."	<p>required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar".</p> <p>Section 7.6 of <b>[APP-320]</b> analyses the potential contribution of "brownfield" solar sites to the national need for solar generation. Brownfield sites, including rooftop and other community energy systems, are likely to grow in the UK and will make a contribution to the decarbonisation of the UK energy system. However, the Statement of Need concludes that on their own, brownfield developments are unlikely to be able to meet the national need for solar. Section 8.5 of the Statement of Need describes and agrees with Government's view that decentralised and community energy systems are unlikely to lead to the significant replacement of large-scale infrastructure. It is the Applicant's view (and this aligns with Government's view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p>

**Table 2.4.5: Applicant's Response to Kexby Parish Council [RR-178]**

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
KePC-01	General	Context of Relevant Representation	REPRESENTATION OF THE COMMUNITY VIEWS ON THE PROPOSE 4 VARIOUS SOLAR FARMS IN AND AROUND OUR COMMUNITIES TOTALLING 2GW OF POWER	The Applicant notes this comment.



**Table 2.4.6: Applicant's Response to Knaith Parish Council [RR-179]**

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
KnPC-01	Principle of Development	Cumulative Effects and Joint Assessment	"This application is just 1 of 4 (currently) within a few miles of each other. The total area would amount to around 10,000 acres. These 4 projects, at present, are all going to be submitted and accessed individually. Surely it would better that they be assessed as a whole. The impact of one project is far different than that of the impact of 4."	<p>The Applicant notes this comment and seeks to assure the Interested Party that a cumulative effects assessment has been prepared for the Application within the <b>Environmental Statement [APP-039 to APP-061]</b>.</p> <p>Cumulative effects assessments for each environmental topic are set out in each of the ES Chapters and include the assessment of the impacts of the Scheme cumulatively with the Gate Burton Energy Park, West Burton Solar Project and Tillbridge Solar Project (see paragraph 2.5.9 of <b>6.2.2 Environmental Statement - Chapter 2 EIA Process and Methodology [APP-040]</b>).</p> <p>This assessment has been carried out in accordance with Schedule 4 of the 2017 EIA Regulations and PINS Advice Note 17. The mitigation measures set out across the ES therefore account for anticipated cumulative effects.</p>
KnPC-02	Soils and Agriculture	Agricultural Land	"Why are there sites where land is unused and does not affect anyone being considered, for example moorland? This raises a number of concerns/issues: The land in question is viable agricultural land. Food producing land will be lost."	<p>Agricultural land is not lost permanently to a solar farm development. In addition, the agricultural land can remain in productive use through the operational period, by, for example, being grazed by livestock (see paras 19.3.3, 19.3.4, 19.10.2, 19.10.6, 19.10.10 of <b>6.2.19</b></p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<b>Environmental Statement - Chapter 19 Soils and Agriculture [APP-057]</b> ).
KnPC-03	Site Description Landscape and Visual Impact	Residential Properties	"This raises a number of concerns/issues:...The proposed project will encompass the hamlets within the proposed area. With the boundary of some areas of the project being close to residential property."	<p>With regards to the visual amenity of neighbouring communities, the Landscape and Visual Impact Assessment contained within <b>6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> (the 'LVIA') takes into account the effects on visual amenity and landscape character, including proximity to people's houses.</p> <p>The design of the Scheme has taken account of mitigation, including offsets and planting to address and minimise adverse effects on residential receptors. This has included off set distances to reduce impacts on these receptors. For example, the assessment has taken account of the 50m off set from residential properties to ensure the best possible fit with their setting. The photography and photomontage information at ES Figures 8.13.1 <b>[APP-194]</b> to 8.13.72 <b>[APP-265]</b> shows how the proposed landscape mitigation will play a key role in making sure the panels are comfortably accommodated. This aspect of the LVIA <b>[APP-046]</b> includes selected towns or villages, groups of buildings and singular buildings (the 'Residential Receptors') within the 1km Study Area. These towns or villages include</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>the settlements of Bransby, Brampton and Marton.</p> <p>The LVIA [APP-046] has identified the need for landscape mitigation, which is set out in the <b>7.3_A Outline Landscape and Ecological Management Plan Revision A [EN010132/EX1/WB7.3_A]</b> which is secured by Requirement 7 in Schedule of the <b>dDCO [EN010132/EX1/WB3.1_A]</b>. The mitigation measures are also shown on <b>6.4.8.18.1-6.4.8.18.3 Environmental Statement - Figures 8.18.1 to 8.18.3 - Landscape and Ecology Mitigation and Enhancement Measures [WB6.4.8.18.1_A to WB6.4.8.18.3_A]</b>. This mitigation will enhance the landscape character of the area and the setting of these settlements and also reduce the visibility of the Scheme from residential receptors. The landscape mitigation measures include new planting, including new native hedgerows and tree cover,. The LEMP also includes provisions for their management and maintenance.</p>
KnPC-04	Socio-economics, Tourism and Recreation	Jobs and economy	"This raises a number of concerns/issues:... The affect this will have on jobs and skills within the farming industry."	The Applicant recognises the significance of the agricultural industry in the local economy and has assessed the economic impact of the Scheme in Section 18.7 of <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b> and the direct impacts on local agriculture in Sections 19.9 and 19.10 of

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p><b>6.2.19 Environmental Statement - Chapter 19 Soils and Agriculture [APP-057].</b></p> <p>The Scheme is anticipated to lead to a maximum loss of approximately 13 full-time equivalent agriculture jobs, as stated in paragraph 18.7.15 of document <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b>. The Scheme is estimated to employ 8 full-time equivalent employees from the local area during operation; see Table 18.16. The net change in employment in the local area (defined as West Lindsey and Bassetlaw Districts) during the Scheme's operational life is a loss of approximately 2 full-time jobs, once consideration of direct, indirect and induced employment, and impacts on the tourism and recreation industry is taken into account (see para. 18.7.81). Overall, the economic benefit to the local area is estimated to be £1.5 million per year (see para. 18.7.99).</p> <p>The overall employment and economic benefit to the local area from the two-year construction period is anticipated to be 432 full-time equivalent jobs (see para. 18.7.23), generating £20.0 million per year (see para. 18.7.52).</p> <p>The land included in the Scheme covers 4 farm businesses, all of which are owner occupiers of the land within the Sites comprising the Scheme.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				This is detailed in full in para. 7.1.1-29 of <b>6.3.19.1 Environmental Statement - Appendix 19.1 Agricultural Land Quality, Soil Resources and Farming Circumstances Report [APP-137]</b> .
KnPC-05	Landscape and Visual Impact  Alternatives and Design Evolution	Size and Height of Solar Panels	"The proposed solar panels are an unprecedented 4.5m high. These structures will not be able to blend into the landscape but dominate 3,000 acres of land."	The assessment of both the landscape and visual effects of the 4.5m high solar panels is set out within Section 8.6 of <b>6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> (the 'LVIA') and within the detailed receptor sheets at <b>6.3.8.2 Environmental Statement - Appendix 8.2 Assessment of Potential Landscape Effects [APP-073]</b> and <b>6.3.8.3 Environmental Statement - Appendix 8.3 Assessment of Potential Visual Effects [APP-074]</b> .
KnPC-06	Principle of Development  Transport and Access  Other Environmental Matters (Human Health)  Socio-Economics,	Cumulative Construction Impact	"The combined construction time would be 4 years when combined with the other 3 projects. This will undoubtedly cause disruption in and around the proposed site, increased works traffic; mental health issues/wellbeing issues for residents and visitors to the area and will natural habitats and wildlife are affected. These projects will destroy not only the countryside but also the way of life of the people who inhabit the villages that these farms are going to engulf."	The Applicant is cognisant of the significance of the countryside for physical and mental wellbeing and, as such, likely impacts on the desirability and use of recreational facilities in the countryside, such as public rights of way, have been assessed in Section 18.7 of <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b> . The greatest level of effect to access, desirability and use of recreational facilities is limited to short- to medium-term moderate adverse effects on long distance recreational routes (the Trent Valley Way

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
	Tourism and Recreation  Ecology and Biodiversity			<p>and National Byways) during construction (see Table 18.15 and para. 18.7.62). This is a <b>significant adverse</b> effect. This is however the only significant effect anticipated, with no greater than moderate-minor adverse anticipated to any other recreational receptor during construction (see paras. 18.7.60 to 18.7.69), or to any recreational receptor during operation (see paras. 18.7.107 to 18.7.117) and decommissioning (see paras. 18.7.147 to 18.7.157). These effects are not anticipated to be significant.</p> <p>This is re-iterated in Section 21.5 of <b>6.2.21 Environmental Statement - Chapter 21 Other Environmental Matters [APP-059]</b>.</p> <p>Cumulative effects on ecology have been assessed within Section 9.9 of <b>6.2.9 Environmental Statement - Chapter 9 Ecology and Biodiversity [APP-047]</b>.</p> <p>The Transport Assessment within <b>6.3.14.1_A Environmental Statement - Appendix 14.1 Transport Assessment Revision A [EN010132/EX1/WB6.3.14.1_A]</b> provides an assessment of the transport effects of the Scheme and concludes, through paragraphs 11.1 to 11.11, that the Scheme is acceptable from a transport perspective.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>An Outline Construction Traffic Management Plan (CTMP) has been prepared to support the application within <b>6.3.14.2_A Environmental Statement - Appendix 14.2 Construction Traffic Management Plan Revision A [EN010132/EX1/WB6.3.14.2_A]</b>.</p> <p>The <b>6.3.14.2 Environmental Statement - Appendix 14.2 Construction Traffic Management Plan [EN01032/EX1/WB6.3.14.2_A]</b> and secured by Requirement 13 Schedule 2 of <b>the dDCO [EN010132/EX1/WB3.1_A]</b> submitted as part of the DCO application provides a framework for the management of construction vehicle movements to and from the Scheme, to ensure that the effects of the temporary construction phase on the local highway network are minimised and made acceptable.</p>
KnPC-07	<p>Principle of Development</p> <p>Energy Need</p> <p>Alternatives and Design Evolution</p> <p>Soils and Agriculture</p>	Efficiency and Requirement of Solar Energy	<p>"Solar panels are inefficient and a poor use of the land. We were given figures of around 27% efficient, which is a low level of energy gained. Surely these would be more effective covering the vast amount of commercial and domestic roof space where it can directly help with energy costs as opposed to inefficiently covering farmland. The options should be exhausted before farmed land is used. It is clearly motivated by profit under the guise of Green Energy."</p>	<p>Section 3.3 of <b>7.11 Statement of Need [APP-320]</b> describes Government's view that large capacities of low-carbon generation will be urgently required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar".</p> <p>Section 7.6 <b>[APP-320]</b> analyses the potential contribution of "brownfield" solar sites to the</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>national need for solar generation. Brownfield sites, including rooftop and other community energy systems, are likely to grow in the UK and will make a contribution to the decarbonisation of the UK energy system. However, the Statement of Need concludes that on their own, brownfield developments are unlikely to be able to meet the national need for solar. Section 8.5 of the Statement of Need describes and agrees with Government's view that decentralised and community energy systems are unlikely to lead to the significant replacement of large-scale infrastructure.</p> <p>Figure 10.2 <b>[APP-320]</b> shows that many solar cell cells are over 20% efficient and some are within reach of 30% efficiency, meaning that more low-carbon electricity can be generated from the same area of land as was previously possible.</p> <p>Table 7.1 <b>[APP-320]</b> shows the electricity generated per Ha by different low-carbon technologies. At the UK's average solar load factor (11%), solar generation produces much more energy per Ha than biogas, and generates a similar amount of energy as onshore wind.</p> <p>It is the Applicant's view (and this aligns with Government's view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p>



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
KnPC-08	<p>Alternatives and Design Evolution</p> <p>The Proposal</p> <p>Energy Need</p> <p>Hydrology and Flood Risk</p> <p>Glint and Glare</p> <p>Soils and Agriculture</p> <p>General (Consultation)</p>	Quality of Consultation	"Were important factors such as panel height, glare, battery storage, generation capabilities, flood risk and brownfield site use accurately communicated."	<p>The Applicant undertook a six-week statutory phase two consultation on the Scheme, during which the Applicant presented consultees and members of the public with environmental information sufficient for consultees to understand the potential likely significant effects of the Scheme in a Preliminary Environmental Impact Report (PEIR). A non-technical summary was published to accompany the PEIR, with public information events and free-to-use communications channels open to help aid accessibility and understanding of the Scheme.</p> <p>Within the DCO Application, the height of the panels, the size and type of battery storage, and the generation capability of the Scheme are presented in Section 4.5 of <b>6.2.4 Environmental Statement - Chapter 4 Scheme Description [APP-042]</b>, with the maximum parameters of the Scheme set out in <b>7.13_A Concept Design Parameters Revision A [EN010132/EX1/WB7.13_A]</b>.</p> <p>Paragraphs 7.6.1-8 of 7.11 Statement of Need [APP-320] analyses the potential contribution of "brownfield" solar sites to the national need for solar generation. Brownfield sites, including rooftop and other community energy systems, are likely to grow in the UK and will make a contribution to the decarbonisation of the UK energy system. However paras 7.6.5-8 conclude</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>that on their own, brownfield developments are unlikely to be able to meet the national need for solar. Paragraphs 8.5.1-10 express agreement with Government's view that decentralised and community energy systems are unlikely to lead to the significant replacement of large-scale infrastructure. The Applicant therefore supports Government's view that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p> <p>Paragraphs 2.1.23-2.1.31 of <b>WB6.3.5.1_A Environmental Statement – Appendix 5.1 Site Selection Assessment Revision A [AS-004]</b> detail the consideration of brownfield land and roof tops and sets out why these were discounted as unsuitable.</p> <p>The flood risk at the Sites and within the Cable Route Corridor is assessed and detailed within <b>6.3.10.1-6.3.10.6 Environmental Statement – Appendices 10.1-10.6 Flood Risk Assessment and Drainage Strategy Reports [APP-089 to APP-094]</b>.</p> <p>Glint and glare impacts upon nearby receptors are assessed in detail within the <b>6.3.16.1 Environmental Statement – Appendix 16.1 Solar Photovoltaic Glint and Glare Study [APP-132]</b> and summarised in <b>6.2.16 Environmental Statement – Chapter 16 Glint and Glare [APP-</b></p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p><b>054].</b> The details of the Scheme and its impacts have been shared with the key consultees. Their responses are set out in Table 16.1 <b>[APP-054]</b>. For those receptors that are predicted to experience a "Moderate" impact the Applicant is committed to implement mitigation to reduce the effects to acceptable levels, these are set out in Section 16.6 and 16.8 <b>[APP-054]</b>, and in Table 3.5 of <b>7.14_A Outline Operational Environmental Management Plan Revision A [EN010132/EX1/WB7.14_A]</b> which is secured by Requirement 14 in Schedule 2 of the <b>dDCO [EN010132/EX1/WB3.1_A]</b>.</p>
KnPC-09	Principle of Development	Supply Chains	<p>"The solar panels and precious minerals are to be sourced and manufactured abroad in (China and others) and the construction labour sourced outside (and if world news reports are to be believed under dubious conditions) of the area. This begs the question as to whether this is an ethically sound proposal. Will the human rights of these overseas workers be respected and checked upon?"</p>	<p>Paragraph 7.3.1 and 7.3.2 of <b>7.10 Outline Skills Supply Chain and Employment Plan [APP-319]</b> sets out the safeguarding measures taken to prevent human rights abuses. Production of the final version of this Plan is secured by Requirement 20 in Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p> <p>Paragraph 5.4.7 of 7.10 Outline Skills Supply Chain and Employment Plan [APP-319] states that: 'Any procurement of supplies internationally will comply with both national and international law, and all policy and safety measures will be adhered to in the transportation of supplies.'</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
KnPC-10	<p>Alternatives and Design Evolution</p> <p>Ecology and Biodiversity</p>	Ecological Impact of Cable Works	"The distance from the Grid connection is excessive and further ecological disruption would be caused by the unnecessary civil works involved in the cable connections."	<p>The Applicant considers that wildlife and the environment have been properly considered within the site selection process and within the subsequent design evolution of the Scheme.</p> <p>The selection of the Scheme's location has followed a systematic step-by-step process as set out in detail within <b>WB6.3.5.1_A Environmental Statement – Appendix 5.1 Site Selection Assessment Revision A [AS-004]</b>. This took a sequential approach to the consideration of potential sites in terms of agricultural land classification and then involved undertaking a desk based assessment of each of the identified Potential Development Areas (PDAs) against a range of planning, environmental and operational criteria, which included ecology and biodiversity (see Annex B: Assessment Indicators and Evaluation Criteria <b>[AS-004]</b>). Potential constraints for each of the sites were mapped and are contained in Annex D <b>[AS-004]</b>). For ecology and biodiversity, this included the mapping of internationally, nationally and locally designated sites of ecological, biological or geological importance and identification of ancient woodlands.</p> <p>The results of the assessment are contained within Annex E <b>[AS-004]</b>). The land for the Scheme has been demonstrated to perform equal to, or better than all of the other PDAs in</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>terms of ecology and biodiversity. In terms of all the assessment criteria combined, it performs better than 8 of the assessed PDAs and equal to the remaining one following the site selection process.</p> <p>The methodology used for the site selection process is considered reasonable and proportionate and complies with the requirements of NPS EN-1 4.4.3 as explained at Section 2.1 <b>[AS-004]</b>. It would not have been reasonable and proportionate to undertake ecological assessment fieldwork for all PDAs at the site selection stage given the vast extent of land under consideration.</p> <p>Following the identification of the draft site areas through the site selection process, detailed ecological assessment work was undertaken across a broad spectrum of species groups. The outcomes of the extensive ecological assessment are reported in <b>6.2.9 Environmental Statement – Chapter 9 Ecology and Biodiversity [APP-047]</b>.</p> <p>The ecological assessment work has resulted in amendments to produce the final Order Limits for the Scheme, including the cable route, and has influenced the layout of solar panels and other infrastructure within the Sites. The design evolution of the Scheme is set out within <b>6.2.5</b></p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<b>Environmental Statement – Chapter 5 Alternatives and Design Evolution [APP-043].</b>
KnPC-11	Site Description Alternatives and Design Evolution Principle of Development	Site Selection Process	<p>“The Scheme comprises a number of land parcels; West Burton 1, covering 90 hectares, West Burton 2, covering 328 hectares, West Burton 3, covering 370 hectares and West Burton 4, covering 247 hectares. The total area covered by these sites is 1,035 hectares (2,484 acres) and all is currently used as arable farmland. This would suggest/show that the land has been chosen by availability as opposed to suitability and therefore has the project been planned well and has the wildlife and environment really been considered.”</p>	<p>The selection of the Scheme's location has followed a systematic step-by-step process as set out in detail within <b>WB6.3.5.1_A Environmental Statement – Appendix 5.1 Site Selection Assessment Revision A [AS-004]</b>. This took a sequential approach to the consideration of potential sites in terms of agricultural land classification and then undertook a desk based assessment of each of the identified Potential Development Areas (PDAs) against a range of planning, environmental and operational criteria, which included ecology and biodiversity (see Annex B: Assessment Indicators and Evaluation Criteria <b>[AS-004]</b>). Potential constraints for each of the sites were mapped and are contained in Annex D <b>[AS-004]</b>. The results of the assessment are contained within Annex E <b>[AS-004]</b>. The land for the Scheme has been demonstrated to perform better than 8 of the assessed PDAs and equal to the remaining one following the site selection process.</p> <p>The methodology used for the site selection process is considered reasonable and proportionate and complies with the requirements of NPS EN-1 4.4.3 as explained at Section 2.1 <b>[AS-004]</b>. It would not have been reasonable and proportionate to undertake</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				assessment fieldwork for all PDAs at the site selection stage given the vast extent of land under consideration.

**Table 2.4.7: Applicant's Response to Marton & Gate Burton Parish Council [RR-213]**

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
MGBPC-01	Principle of Development Energy Need	Cumulative Development	"Whilst it is recognised that the established Power Station sites at West Burton and Cottam provide the necessary infrastructure to connect the solar farms to the grid, the number of proposed solar farms in this area is excessive"	<p>Section 3.3 of <b>7.11 Statement of Need [APP-320]</b> describes Government's view that large capacities of low-carbon generation will be urgently required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar".</p> <p>Section 8.5 <b>[APP-320]</b> describes and agrees with Government's view that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p> <p>Paragraphs 3.3.17-18 <b>[APP-320]</b> explains Government's view that irradiance, site topography and proximity to suitable connection points to the transmission network, are likely to be key inputs to site selection. Section 7.5 of the Statement of Need describes the site selection process for large scale solar more fully, and Section 7.7 of the Statement of Need sets out how the design of the Scheme has sought to maximise utilisation of the existing available and contracted grid connection capacity available at the West Burton substation.</p> <p>Paragraph 7.6.8 <b>[APP-320]</b> describes Government's anticipated range of 2 to 4 acres for each MW of output generally required for a</p>



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>solar farm along with its associated infrastructure. The Scheme as proposed delivers a large-scale solar generation asset which is consistent with this range.</p> <p>Cumulative effects assessments for each environmental topic are set out in each of the ES Chapters and include the assessment of the impacts of the Scheme cumulatively with the Gate Burton Energy Park, Cottam Solar Project and Tillbridge Solar Project (see paragraph 2.5.9 of <b>6.2.2 Environmental Statement – Chapter 2 EIA Process and Methodology [APP-040]</b>).</p> <p>This assessment has been carried out in accordance with Schedule 4 of the 2017 EIA Regulations and PINS Advice Note 17. The mitigation measures set out across the ES therefore account for anticipated cumulative effects.</p>
MGBPC-02	Principle of Development Energy Need Climate Change Soils and Agriculture	Agricultural Land for Food Production	<p>"[The] number of proposed solar farms in this area is excessive, as is the combined acreage of good quality agricultural land that would be taken out of food production. Global prices and availability of even basic crops such as wheat show how vitally important it is that the UK produces as much of its own food as possible. War, flooding and drought have shown that we cannot rely on other countries to grow our food. Home food production also cuts down on "food</p>	<p>Section 3.3 of <b>7.11 Statement of Need [APP-320]</b> describes Government's view that large capacities of low-carbon generation will be urgently required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar".</p> <p>Section 8.5 <b>[APP-320]</b> describes and agrees with Government's view that large scale solar must be</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>miles" thus reducing damage to the environment from the emissions associated with transportation."</p>	<p>deployed to meet the urgent national need for low-carbon electricity generation.</p> <p>Cumulative effects assessments for each environmental topic are set out in each of the ES Chapters and include the assessment of the impacts of the Scheme cumulatively with the Gate Burton Energy Park, Cottam Solar Project and Tillbridge Solar Project (see paragraph 2.5.9 of <b>6.2.2 Environmental Statement - Chapter 2 EIA Process and Methodology [APP-040]</b>).</p> <p>This assessment has been carried out in accordance with Schedule 4 of the 2017 EIA Regulations and PINS Advice Note 17. The mitigation measures set out across the ES therefore account for anticipated cumulative effects.</p> <p>Defra produce a UK Food Security report, the most recent of which was published in 2021. It notes that key risks to UK food security include climate change and soil degradation. Development of UK agricultural land is not noted among these risks. In addition to renewable energy, the Scheme is anticipated to enable the recovery of soil organic matter through the reversion of arable land to less intensive agricultural uses for the duration of the operation of the Scheme. For further details please see Paragraph 19.9.14 of <b>6.2.19 Environmental</b></p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<b>Statement – Chapter 19 Soils and Agriculture [APP-057].</b>
MGBPC-03	Soils and Agriculture Energy Need	Agricultural Land Quality	“The solar farm developers say that the land under consideration is low quality land, but this land has still produced valuable crops for generations. There is already a heavy loss on productive agricultural land due to the demand for more housing without more loss from solar panels.”	<p>Agricultural land is not lost to or degraded by the development of a solar farm.</p> <p>The Agricultural Land Classification (ALC) methodology was developed by Ministry of Agriculture, Fisheries and Food (MAFF) specifically to inform land use planning decisions. Information on the ALC Methodology is given in paragraphs 2.1.1 to 2.2.5 of <b>6.3.19.1 Environmental Statement – Appendix 19.1 Agricultural Land Quality, Soil Resources and Farming Circumstances Report [APP-137]</b>. ALC grade is determined by reference to specific physical characteristics of the land, not by cropping or yield.</p> <p>The Applicant notes the Interested Party's comment on the demand for more housing, and notes that any other development proposals will be subject to their own assessments and application of the planning balance.</p>
MGBPC-04	Socio-economics, Tourism and Recreation	Agricultural Economy	“Agriculture is very important to the economy and way of life to a rural County like Lincolnshire. Many farmers are tenants on the land they farm and so have no say over the land being turned over to solar panels and they would lose their	The Applicant recognises the significance of the agricultural industry in the local economy and has assessed the economic impact of the Scheme in Section 18.7 of <b>6.2.18 Environmental Statement – Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b> and the direct impacts on local agriculture in Sections 19.9 and 19.10 of

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>livelihood, causing unemployment and increasing social deprivation."</p>	<p><b>6.2.19 Environmental Statement – Chapter 19 Soils and Agriculture [APP-057].</b></p> <p>The Scheme is anticipated to lead to a maximum loss of approximately 13 full-time equivalent agriculture jobs, as stated in paragraph 18.7.15 of document <b>6.2.18 Environmental Statement – Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b>. The Scheme is estimated to employ 8 full-time equivalent employees from the local area during operation; see Table 18.16. The net change in employment in the local area (defined as West Lindsey and Bassetlaw Districts) during the Scheme's operational life is a loss of approximately 2 full-time jobs, once consideration of direct, indirect and induced employment, and impacts on the tourism and recreation industry is taken into account (see para. 18.7.81). Overall, the economic benefit to the local area is estimated to be £1.5 million per year (see para. 18.7.99).</p> <p>The overall employment and economic benefit to the local area from the two-year construction period is anticipated to be 432 full-time equivalent jobs (see para. 18.7.23), generating £20.0 million per year (see para. 18.7.52).</p> <p>The land included in the Scheme covers 4 farm businesses, all of which are owner occupiers of the land within the Sites comprising the Scheme.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				This is detailed in full in para. 7.1.1-29 of <b>6.3.19.1 Environmental Statement – Appendix 19.1 Agricultural Land Quality, Soil Resources and Farming Circumstances Report [APP-137]</b> .
MGBPC-05	Ecology and Biodiversity  Soils and Agriculture	Soil and Ecological Conditions	"The solar farm developers maintain that soil conditions and insect life improve as a result of less human involvement in the land, but so will pernicious and invasive weeds."	<p><b>7.3_A Outline Landscape and Ecological Management Plan Revision A [EN010132/EX1/WB7.3_A]</b> (OLEMP) contains grassland habitat management prescriptions (particularly Section 4.7) which will ensure that undesirable plant species such as docks, nettles, ragwort, rushes and thistles will be adequately managed through cutting to ensure they do not become dominant. Monitoring from a contracted ecologist (Section 4.10) is also programmed to ensure the management prescriptions can adequately adapt to the particular conditions across the operational Scheme.</p> <p>Measures set out in the OLEMP <b>[EN010132/EX1/WB7.3_A]</b> are secured through Requirement 7 in Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p> <p>Paragraph 19.9.14 of <b>6.2.19 Environmental Statement – Chapter 19 Soils and Agriculture [APP-057]</b> references Defra R&amp;D project SP08016 that identifies the soil health and wider environmental benefits obtained through reversion of arable land to grassland.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
MGBPC-06	Ecology and Biodiversity	Migratory Corridors	"Animal life would suffer as natural food supplies would be reduced and their traditional migratory corridors would be impeded."	<p>The Applicant notes this comment.</p> <p>Section 9.6 of <b>6.2.9 Environmental Statement – Chapter 9 Ecology and Biodiversity [APP-047]</b> sets out the extensive findings of all ecological investigations undertaken within the Order Limits together with an appraisal of the relative importance of each species or species group, habitat or designated site. A comprehensive package of mitigation measures has been identified, in tandem with embedded mitigation (see Section 9.6) which is secured through the ecologically sensitive design of the Scheme (and includes measures such as the wide buffering of all field boundaries and the use of existing hedgerow gaps for accesses). These measures have been further detailed within <b>7.17 Outline Ecological Protection and Mitigation Strategy [APP-326]</b> and <b>7.3_A Outline Landscape and Ecological Management Plan Revision A [EN010132/EX1/WB7.3_A]</b> which will ensure that all identified impacts are minimised as far as possible. In many cases, the reversion from intensive agriculture to pasture or meadow grassland with additional hedgerow, scrub, tree and wetland habitat creation will bring about positive effects for wildlife. In particular, terrestrial and aquatic invertebrates, botanical diversity, small mammals and many species of bird all stand to benefit as set out in Section 9.7 in</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p><b>6.2.9 Environmental Statement - Chapter 9 Ecology and Biodiversity [APP-047].</b></p> <p>More specifically, in our experience of monitoring over 100 active solar arrays, we find that brown hare and badgers are highly active on solar arrays owing to the improved foraging habitat within them. Birds of prey, including owls, are one species group likely to benefit from the provision of large areas of optimal habitat for small mammals such as field voles which require tussocky and dense grassland which will be created within buffered field boundaries.</p> <p>Construction activities will be temporary, and since they are limited primarily to the piling of metal supports into the ground and laying of electrical cabling, they are not considered to create a level of disturbance which significantly exceeds that generated by typical agricultural sowing, spraying and harvesting operations. . The control of construction activities is managed through <b>7.1 Outline Construction Environmental Management Plan [EN010132/EX1/WB7.3_A]</b> and secured by <b>Requirement 13</b> in Schedule 2 in the <b>dDCO [EN010132/EX1/WB3.1_A]</b>.</p>
MGBPC-07	Landscape and Visual	Vistas	"For centuries there has been a beautiful view from Lincoln Ridge, across the Trent Valley and over to Nottinghamshire. If the solar farm	The assessment of both the landscape and visual effects of the 4.5m high solar panels is set out within Section 8.6 of <b>6.2.8 Environmental</b>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>companies get their way, this beautiful vista will be replaced by a sea of ugly panels."</p>	<p><b>Statement – Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> (the 'LVIA') and within the detailed receptor sheets at <b>6.3.8.2 Environmental Statement – Appendix 8.2 Assessment of Potential Landscape Effects [APP-073]</b> and <b>6.3.8.3 Environmental Statement – Appendix 8.3 Assessment of Potential Visual Effects [APP-074]</b>.</p> <p>The effects on the Ridge AGLV when viewed across the low-lying Till Vale associated with the substations, panels and associated infrastructure such as fencing and cameras, and battery storage have been taken into consideration in the assessment of both landscape and visual effects.</p> <p>The LVIA takes into consideration the landscape implications of the Scheme on the AGLV designation, in particular the Ridge AGLV or Laughton Wood AGLV (as identified in paragraphs 8.4.11, 8.5.125, 8.5.126, 8.5.142, 8.5.161, 8.5.162, 8.7.36, 8.7.38, 8.7.86, 8.7.88, 8.7.145, 8.7.147, 8.9.47, 8.9.48, 8.9.49) noting there will be positive changes to the wider setting of the AGLVs due to the additional vegetation enhancing the local landscape character.</p> <p>The LVIA also considers the impacts of the Scheme on the AGLV designation alongside the proposed Gate Burton proposal (see paragraphs</p>



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>8.10.74 to 8.10.79) and has concluded that effects will be <b>Not Significant</b> on landscape character and visual amenity over an extensive area as a result of the cumulative impacts of the schemes.</p> <p>The LVIA [paras 8.5.86] also recognises the importance of long-distance views to the more elevated wooded skylines to the east, long views to the north and south, which are constrained only by the effects of distance, riverside vegetation and hedgerows.</p> <p>The LVIA includes a suite of viewpoints that cover long range views across the Till Vale encompassing the big expansive skies, for example viewpoints VP12, VP15, VP16 and VP35. There are also additional viewpoints at the request of Lincolnshire County Council that were agreed at the LVIA Workshops held prior to submission that also include these long-range views, for example LCC-A from the ridgeline to the east and LCC-J from the wider Trent valley to the west.</p>
MGBPC-08	Landscape and Visual	Tourism	"In turn, this could impact on tourism for the area, which could again result in loss of income and increased social deprivation."	<b>6.2.8 Environmental Statement – Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> includes a full and detailed assessment

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
	Socio-economics, Tourism and Recreation			<p>that deals with both effects on the landscape itself and effects on the visual amenity of people, as well as interrelationships of these with other related topics in the ES. The LVIA process is iterative and as a result, the design of the Scheme has changed to respond to the findings of the assessment to ensure that landscape mitigation is fully considered as part of the process.</p> <p>Where the LVIA <b>[APP-046]</b> has identified significant adverse effects, extensive landscape mitigation is set out in <b>7.3_A Outline Landscape and Ecological Management Plan Revision A [EN010132/EX1/WB7.3_A]</b> which is secured by Requirement 7 in Schedule 2 of the <b>dDCO [EN010132/EX1/WB3.1_A]</b>.</p> <p>is the mitigation measures are also shown on <b>6.4.8.18.1-6.4.8.18.3 Environmental Statement – Figures 8.18.1 to 8.18.3 – Landscape and Ecology Mitigation and Enhancement Measures [WB6.4.8.18.1_A to WB6.4.8.18.3_A]</b>. This mitigation seeks to visually enhance the landscape through the addition of new planting and the positive management of the existing tree and hedgerow stock. This mitigation also seeks to reduce the visibility of the Scheme and help with its assimilation into the landscape from public vantage points including transport routes, public footpaths, permissive footpaths and green lane networks. This mitigation is aimed to benefit the</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>community as a whole as well as tourists, visiting walkers, local residents, ornithologists and cyclists. The landscape mitigation measures include new planting, including new native hedgerows and tree cover,. The LEMP also includes provisions for their management and maintenance.The Applicant and its LVIA consultants at Lanpro have worked closely with the heritage and ecology consultants throughout the application process to inform the LVIA <b>[APP-046]</b> and associated mitigation plans. The mitigation proposals allow for flexibility, but they are also fixed, where appropriate and applicable.</p> <p>The likely impacts on the desirability and use of the area surrounding the Scheme for tourism and recreation have been assessed in Section 18.7 of <b>6.2.18 Environmental Statement – Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b>. The greatest effects during construction are anticipated to be medium-term temporary moderate adverse effect on the landscape setting of tourism attractions (see para. 18.7.57), and a short- to medium-term temporary moderate adverse effect on the Trent Valley Way and National Byways long distance recreational routes (see Table 18.15 and para. 18.7.62). These effects are therefore both <b>significant adverse</b>. These are however the only significant effect anticipated, with no greater than moderate-minor</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>adverse anticipated to any other tourism and recreational receptor during construction (see paras. 18.7.60 to 18.7.69), or to any tourism and recreational receptor during operation (see paras. 18.7.107 to 18.7.117) and decommissioning (see paras. 18.7.147 to 18.7.157). These effects are not anticipated to be significant.</p> <p>The overall impacts on the level of Income as measured by Gross Value Added per person, and access to employment as a measured index of deprivation has been assessed in Section 18.7 [APP-056]. The level of income generated by the Scheme has been assessed to have an overall beneficial effect on the local workforce during construction (para. 18.7.53), operation (18.7.100) and during decommissioning (18.7.141).</p> <p>Access to employment during construction (see para. 18.7.38 and 18.8.12) is anticipated to result in a <b>significant</b> beneficial effect. During operation, access to employment is anticipated to be enhanced through the measures set out in Section 5 of <b>7.10 Outline Skills Supply Chain and Employment Plan [APP-319]</b> (maximising local recruitment and enhancing opportunities for local procurement (para. 5.3.1-5.4.7)), to provide an overall beneficial effect. The Skills, Supply Chain and Employment Plan is secured by Requirement 20 of Schedule 2 to <b>3.1_A Draft</b></p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<b>Development Consent Order Revision A [EN010132/EX1/WB3.1_A].</b>
MGBPC-09	Principle of Development Cultural Heritage	Cumulative Cable Route Impacts on Heritage	<p>"Although not all the proposed solar farms are in the immediate vicinity of our villages of Marton and Gate Burton, the cable routes for ALL of the proposed developments would pass through our Parish in order to link to the Power Station sites on the other side of the River Trent. This area has Roman heritage related to it, the A1500 being the Roman road known as Tillbridge Lane. The local Planning Authority requires archaeological surveys to be undertaken before any development is allowed in the vicinity of the river and we hope that our Roman heritage and the potential for any archaeological remains will not be overlooked if the cable routes are underground."</p>	<p>The Applicant notes this comment and would like to highlight that a full suite of archaeological assessment, survey and field evaluation has been undertaken for the Scheme. The results of various assessments are detailed in the following appendices:</p> <p><b>6.3.13.1 Environmental Statement-- Appendix 13.1 Archaeological Desk-Based Assessments [APP-105 to APP-108];</b></p> <p><b>6.3.13.2 Environmental Statement-- Appendix 13.2 Archaeological Geophysical Survey Reports [APP-109 to APP-114];</b></p> <p><b>6.3.13.3 Environmental Statement-- Appendix 13.3 Geoarchaeological Desk Based Assessment [APP-115];</b></p> <p><b>6.3.13.4 Environmental Statement-- Appendix 13.4 Air Photo and LiDAR Report [APP-116];</b></p> <p><b>6.3.13.5 Environmental Statement-- Appendix 13.5 Heritage Statement [APP-117 to APP-119];</b> and</p> <p><b>6.3.13.6 Environmental Statement-- Appendix 13.6 Archaeological Evaluation Trenching Reports [APP-120 to APP-121].</b></p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>To minimise harm to potential archaeological remains, the West Burton Solar Project, Cottam Solar Project and Gate Burton Energy Park have proposed a shared cable corridor route. The assessments have identified concentrations of previously unrecorded archaeological remains associated with the former Roman Road (A1500), which have been crucial in widening our understanding of Roman settlement and activity adjacent to the River Trent. The results of the assessments have been used to formulate a Mitigation Strategy aimed at safeguarding buried archaeological remains (<b>6.3.13.7 Environmental Statement-- Appendix 13.7 Archaeological Mitigation Written Scheme of Investigation [APP-122]</b>). This is secured through Requirement 12 of Schedule 2 in <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p> <p>Where archaeological remains have been identified within the proposed shared cable corridor route, mitigation in the form of Strip Map and Record has been agreed with the Lincolnshire Historic Place Team (refer to Section 42 Response Table in <b>6.3.13.9 Environmental Statement-- Appendix 13.9 Consultation Response Tables [APP-124]</b>), who provide archaeological advice to the West Lindsey district</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				of Lincolnshire and Bassetlaw district of Nottinghamshire.
MGBPC-10	Alternatives and Design Evolution Energy Need	Alternative Siting	""Brownfield" sites and rooftops should be considered for solar panels before open, productive agricultural land."	<p>Section 3.3 of <b>7.11 Statement of Need [APP-320]</b> describes Government's view that large capacities of low-carbon generation will be urgently required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar".</p> <p>Section 7.6 <b>[APP-320]</b> analyses the potential contribution of "brownfield" solar sites to the national need for solar generation. Brownfield sites, including rooftop and other community energy systems, are likely to grow in the UK and will make a contribution to the decarbonisation of the UK energy system. However, the Statement of Need concludes that on their own, brownfield developments are unlikely to be able to meet the national need for solar. Section 8.5 <b>[APP-320]</b> describes and agrees with Government's view that decentralised and community energy systems are unlikely to lead to the significant replacement of large-scale infrastructure. It is the Applicant's view (and this aligns with Government's view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p>





**Table 2.4.8: Applicant's Response to Saxilby with Ingleby Parish Council [RR-299]**

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
SIPC-01	General	Context of Relevant Representation	"This position statement sets out Saxilby with Ingleby Parish Council and wider community view on the principle of large ground-mounted solar PV developments and identifies planning issues that should be considered by the Planning Inspectorate."	The Applicant notes this comment.
SIPC-02	Site Description General Cultural Heritage Landscape and Visual Impact Socio-economics, Tourism and Recreation	Site Context and Overview of Parish	"Saxilby with Ingleby is a rural historic Parish with the villages of Saxilby and Ingleby making up most of the built up area. Several historic buildings remain in Saxilby with Ingleby which span the centuries: St Botolph's Church (C12th), Saxilby Old Hall (C15th), the Manor Farm House (C16th) and several cottages (C18th). The Fosdyke canal is the oldest artificial waterway in the country, connecting the River trent at Torksey to the River Till at Odder. The Fosdyke has influenced village life in Saxilby with Ingleby significantly throughout the past two millennia. These historic features are brought together within the Bridge Street Conversation Area. The rest of the Parish is rural and is located within the rolling arable landscape of the Till Vale, a stretch of land which runs north south radiating out from the River Till and is bounded to the west by the River Trent and to the east by the abrupt escarpment of Lincoln Cliff, a Jurassic limestone cliff."	<p>The assessment of both the landscape and visual effects of the 4.5m high solar panels is set out within Section 8.6 of <b>6.2.8 Environmental Statement – Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> (the 'LVIA') and within the detailed receptor sheets at <b>6.3.8.2 Environmental Statement – Appendix 8.2 Assessment of Potential Landscape Effects [APP-073]</b> and <b>6.3.8.3 Environmental Statement – Appendix 8.3 Assessment of Potential Visual Effects [APP-074]</b>.</p> <p>The effects on the Ridge AGLV when viewed across the low-lying Till Vale associated with the sub-stations, panels and associated infrastructure such as fencing and cameras, and substation and battery storage have been taken into consideration in the assessment of both landscape and visual effects.</p> <p>The LVIA takes into consideration the landscape implications of the Scheme on the AGLV designation, in particular the Ridge AGLV or</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>Laughton Wood AGLV (as identified in paragraphs 8.4.11, 8.5.125, 8.5.126, 8.5.142, 8.5.161, 8.5.162, 8.7.36, 8.7.38, 8.7.86, 8.7.88, 8.7.145, 8.7.147, 8.9.47, 8.9.48, 8.9.49) noting there will be positive changes to the wider setting of the AGLVs due to the additional vegetation enhancing the local landscape character.</p> <p>The LVIA also considers the impacts of the Scheme on the AGLV designation alongside the proposed Gate Burton proposal (see paragraphs 8.10.74 to 8.10.79) and has concluded that effects will be <b>Not Significant</b> on landscape character and visual amenity over an extensive area as a result of the cumulative impacts of the schemes.</p> <p>The Fosdyke Navigation Canal has been identified in <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b> as a navigable waterway used for recreational use and as such has been assessed for impacts as a result of the Scheme on its desirability and use. Paragraphs 18.7.64, 18.7.111, and 18.7.155 identify that there is no greater than a minor adverse effect anticipated as a result of the Scheme during construction, operation, and decommissioning respectively. These are therefore not significant effects.</p> <p>The Heritage Statement within <b>6.3.13.5 Environmental Statement - Appendix 13.5</b></p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>[APP-117 to APP-119], provides a detailed assessment of all Grade II Listed Buildings and Conservation Areas within 2km of the Scheme, and all Grade I and II* Listed Buildings and Scheduled Monuments with a 5km study area surrounding the Scheme.</p> <p>St. Botolph's Church, Saxilby is discussed in paragraphs. 3.1.79, 3.2.60 – 3.2.63, 3.3.42 – 3.3.47 [APP-117], and it is concluded that there would be <i>Slight Adverse</i> impacts to this asset as a result of the Scheme, but by Year 15 of the operating phase this would be reduced to <i>Neutral</i> as the landscape mitigation (screening) comes into effect. Saxilby Old Hall is discussed in para. 3.1.49, and The Manor House and Saxilby Bridge Conservation Area are discussed in para. 3.1.113. Para. 3.1.113 concludes that there is no intervisibility with the surrounding landscape from any of these Listed Buildings or the Conservation Area and there would be no visual impact from the Scheme.</p>
SIPC-03	Site Description Principle of Development	Proposal and Cumulative Projects	"The West Burton Energy Project (Part 2) led by Island Green Power covers a large area of the Parish to the North of Saxilby and encompasses the small village of Ingleby. Part 2 of the project is linked to parts 1, 3 and 4 and to the Cottam project. In total, the scheme will provide 480 MW of renewable energy, and have the facility to store 20 MW of energy. There are two other	The area consisting the Site at West Burton 2 is described in detail in Section 3.4 of <b>6.2.3 Environmental Statement-- Chapter 3 The Order Limits [APP-041]</b> , whilst the rest of the chapter [APP-041] describes the Order Limits of the Scheme .

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>interrelated projects Gate Burtin and Tillbridge that will have a culumative impact on the area. The West Burton scheme and Cottam scheme are each around 480MW, Cottam includes 600MW of storage. Gate Burton and Tillbridge are around 500MW each. These four schemes will cover 1000 acres."</p>	<p>West Burton 4 was removed from the Scheme prior to the DCO application being made.</p> <p>Cottam Solar Project is a separate DCO application [<b>PINS Ref: EN010133</b>], albeit applied for by the same developer (Island Green Power) as West Burton Solar Project. The two projects share part of their cable route but are otherwise functionally independent from each other.</p> <p>Section 2 of <b>7.7 Grid Connection Statement [APP-316]</b> demonstrates that the West Burton Scheme has an export capacity of 480MW, and an import capacity of 20MW, to and from the National Grid. The quantum of energy storage is defined only by the area allocated for Work No.2 on <b>2.3_B Works Plan Revision B [EN010132/EX1/WB2.3_B]</b>, but is approximated for the purpose of assessment in <b>6.2.7 Environmental Statement-- Chapter 7 Climate Change [APP-045]</b> as 159MWh.</p> <p>The comparative figures for nearby NSIPs is as follows:</p> <p>Cottam [<b>PINS Ref: EN010133</b>]: 600MW export capacity, 600MW import capacity, 1,200 or 2,400MWh battery storage;</p> <p>Gate Burton [<b>PINS Ref: EN010132</b>]: 500MW export capacity, 500MW import capacity, 500MWh battery storage;</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>Tillbridge [<b>PINS Ref: EN010142</b>]: assumed 500MW export capacity, assumed 500MW import capacity, assumed 2,300MWh battery storage.</p> <p>The four projects together will have a cumulative area of circa. 10,000 acres (4,000 hectares).</p>
SIPC-04	Energy Need Principle of Development	Introduction to Parish Considerations	<p>"This Statement sets out a number of considerations to ensure that any schemes for ground-mounted solar PV which come forward in the parish of Saxilby with Ingleby: a) are adequately justified; b) are of an appropriate scale and location; c) respect local landscape, heritage and visual amenity; d) assess the cumulative impacts."</p>	<p>The Applicant notes this comment and has addressed the parish council's considerations in turn in the responses below.</p>
SIPC-05	Planning Policy Energy Need Alternatives and Design Evolution	National Policy and Siting of NSIPs	<p>"The Government's drive for a zero carbon economy by 2050 is supported by the Parish Council which itself has a set of environment related objectives upon which local decisions are based. The Parish Council considers that appropriate renewable energy infrastructure and technology form a central part to achieving this goal. However, the Parish Council also believe that the right balance needs to be achieved between the scale and location of renewable energy infrastructure and losing valued landscapes and biodiversity. Not all of this infrastructure should be provided within a single area. The impacts of such infrastructure should be spread across the Country and in areas where</p>	<p>Section 3.3 of <b>7.11 Statement of Need [APP-320]</b> describes Government's view that large capacities of low-carbon generation will be urgently required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar".</p> <p>Section 8.5 [<b>APP-320</b>] describes and agrees with Government's view that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p> <p>Paragraphs 3.3.17-18 [<b>APP-320</b>] explains Government's view that irradiance, site</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>it causes the least impacts to the environment and communities."</p>	<p>topography and proximity to suitable connection points to the transmission network, are likely to be key inputs to site selection. Section 7.5 [APP-320] describes the site selection process for large scale solar more fully, and Section 7.7 [APP-320] sets out how the design of the Scheme has sought to maximise utilisation of the existing available and contracted grid connection capacity available at the West Burton substation.</p> <p>Section 7 of <b>7.5 Planning Statement [APP-313]</b> concludes with a consideration of the Planning Balance and justifies how the overwhelming national need, as demonstrated in the Statement of Need outweighs any potential significant adverse impacts which, as the <b>Environmental Statement [APP-039 to APP-061]</b> sets out, are limited.</p> <p>Cumulative effects assessments for each environmental topic are set out in each of the ES Chapters and include the assessment of the impacts of the Scheme cumulatively with the Gate Burton Energy Park, West Burton Solar Project and Tillbridge Solar Project (see paragraph 2.5.9 of <b>6.2.2 Environmental Statement-- Chapter 2 EIA Process and Methodology [APP-040]</b>).</p> <p>This assessment has been carried out in accordance with Schedule 4 of the 2017 EIA Regulations and PINS Advice Note 17. The</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				mitigation measures set out across the ES therefore account for anticipated cumulative effects.
SIPC-06	Planning Policy	NPPF	"To help manage the impacts of renewable energy developments, Paragraph 155 (a) and (b) of the National Planning Policy Framework states that Local Plans should: 'provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts)'; and 'consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development'."	The Applicant notes this comment and refers to paragraph 5 of the National Planning Policy Framework (NPPF) which makes it clear that the document does not contain specific policies for Nationally Significant Infrastructure Projects like the Scheme, and therefore whilst the policies in the NPPF should be considered and are important, they are attributed less weight in the Secretary of State's decision making process than the relevant policies in the adopted Energy NPSs and Draft Energy NPSs (Section 5.5 and 5.6 of <b>7.5 Planning Statement [APP-313]</b> ).
SIPC-07	Planning Policy	Limitations of Local Policy	"The Central Lincolnshire Local Plan 2017 (and the emerging 2022 review Plan) fails to identify any 'preferred' locations for renewable energy developments and therefore doesn't provide the framework for guiding such large-scale schemes. This lack of local guidance contributes towards the continuation of an 'unplanned' approach to large scale renewable energy infrastructure across Central Lincolnshire leading to further vulnerability to the environment and a set of cumulative landscape related issues in the future."	Tables 1.1 and 1.2 of Appendix D: Local Planning Policy Accordance Table to <b>7.5 Planning Statement [APP-313]</b> sets out how the Scheme accords with the planning policies set out in both the adopted and emerging draft Central Lincolnshire Local Plans.  The methodology used for the site selection process is considered reasonable and proportionate and complies with the requirements of NPS EN-1 4.4.3 as explained at Section 2.1 of <b>WB6.3.5.1_A Environmental Statement-- Appendix 5.1 Site Selection</b>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p><b>Assessment Revision A [AS-004].</b> The failure of the Local Plan to identify any 'preferred' locations for renewable energy developments therefore cannot be given any weight in the decision making process.</p> <p>Please see the response to SIPC-06 above for further details relating to the policy against which the Scheme will be assessed.</p>
SIPC-08	Principle of Development Energy Need	Parish Approach to Renewable Energy	"The Parish Council works to ensure renewable energy projects are carried out, in a way that minimises impacts on our environment and community, and makes sure that the communities who host such schemes benefit directly from them."	<p>Section 3.3 of <b>7.11 Statement of Need [APP-320]</b> describes Government's view that large capacities of low-carbon generation will be urgently required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar".</p> <p>It is the Applicant's view (and this aligns with Government's view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p> <p>Section 7 of <b>7.5 Planning Statement [APP-313]</b> concludes with a consideration of the Planning Balance and justifies how the overwhelming national need, as demonstrated in the Statement of Need outweighs any potential significant adverse impacts which, as the <b>Environmental</b></p>



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p><b>Statement [APP-039 to APP-061]</b> sets out, are limited.</p> <p>Whilst not a direct and targeted local energy supply benefit, there is benefit to all UK citizens – including local communities – from the UK producing more clean, renewable electricity, in terms of affordability and energy security and resilience. This is considered further in detail in Sections 7.4, 8.7, 8.8, 8.10, 10.2, 10.3 and 11.5 of <b>7.11 Statement of Need [APP-320]</b>.</p> <p>The Applicant has committed to providing a community benefit fund but this does not form part of the DCO application, and this funding is not required to mitigate the impacts of an appropriate mechanism for the funding to be distributed. Further updates on this matter will be provided during the examination.</p>
SIPC-09	Principle of Development  Landscape and Visual Impact	Cumulative Impacts	"A recent increase in applications for large solar farms within the wider area has increased the potential for cumulative negative impact on the rural flat and historic landscape around Saxilby."	<p>The Applicant respectfully disagrees with the Councils comment and considers the approach taken and subsequent conclusions regarding assessing the impacts of the Scheme alongside other applications for solar, including the proposed Cottam, Gate Burton and Tillbridge Solar proposals would not result in significant adverse effects on landscape character and visual amenity over an extensive area.</p> <p>The judgements on the likely significant cumulative effects and conclusions for the</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>landscape and visual receptors are set out within Section 8.10 of <b>6.2.8 Environmental Statement-- Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> (the 'LVIA'), <b>6.3.8.2 Environmental Statement-- Appendix 8.2 Assessment of Potential Landscape Effects [APP-073]</b> and <b>6.3.8.3 Environmental Statement-- Appendix 8.3 Assessment of Potential Visual Effects [APP-074]</b>.</p> <p>The cumulative effect with the Cottam scheme are illustrated on <b>6.4.8.17.1 Environmental Statement-- Figure 8.17.1-- Cumulative Development Augmented ZTV-- Cottam [APP-277]</b>/ These show the Cottam scheme as being located to the north east of the settlements of Stow and Willingham. This demonstrates that cumulative effects between these projects would not occur due to the significant distance between them. The LVIA <b>[APP-046]</b> concludes that with Regional Character Areas and Individual Contributors to Landscape Character, there is potential for cumulative effects, but that these would be <b>Not Significant</b>. The LVIA sets out (para. 8.10.86) for example, with regard to Viewpoint LCC-A-Middle Street that <i>"There may be opportunities (depending upon weather and atmospheric visibility) for successional glimpses of the West Burton and Cottam Sites. However, if available, this would be very glimpsed, transient and</i></p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p><i>filtered by vegetation across the landscape and would be regarded as two detached solar schemes in two separate land parcels."</i></p> <p>The cumulative effects with the Gate Burton scheme are illustrated on <b>6.4.8.17.2 Environmental Statement-- Figure 8.17.2-- Cumulative Development Augmented ZTV-- Gate Burton [APP-278]</b>. These show the Gate Burton scheme as being located to the west of the settlements of Willingham by Stow, Kexby and Upton. This demonstrates that cumulative effects of these projects would not occur due to the significant distance between them. The LVIA <b>[APP-046]</b> concludes that with Regional Character Areas and Individual Contributors to Landscape Character, there is potential for cumulative effects, but that these would be <b>Not Significant</b>. The LVIA sets out (para. 8.10.88) for example, with regard to transport receptor T058/Northern Railway – Saxilby to Gainsborough that <i>"The route continues north through the Gate Burton Energy Park development, with users having views of the surrounding array as they pass through"</i>, but that the effects would be <b>Not Significant</b>.</p> <p>The cumulative effects with the Tillbridge scheme are illustrated on <b>6.4.8.17.3 Environmental Statement-- Figure 8.17.3-- Cumulative Development Augmented ZTV-- Tillbridge [APP-279]</b>. These show the Tillbridge scheme as</p>

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				<p>being located to the west and east of the settlement of Springthorpe and situated between the settlements of Heapham, Hemswell Cliff and Glentworth. This demonstrates that cumulative effects between these projects would not occur due to the significant distance between them. The LVIA [APP-046] concludes that with Regional Character Areas and Individual Contributors to Landscape Character, there is potential for cumulative effects, but that these would be <b>Not Significant</b>. The LVIA sets out (para. 8.10.22) for example, with regard to location and proximity that <i>"The Tillbridge Solar Project continues from the northern extent of the Cottam 1 Site north towards the A631. The Cottam Solar Project is approximately 1.5km north of the West Burton 1 Site. The Tillbridge Solar Project is approximately 7.25km north of the West Burton 1 Site."</i></p>
SIPC-10	Landscape and Visual Impact	Local Landscape Character	<p>"The West Lindsey Landscape Character Assessment (WLLCA), published in 1999, provides a detailed assessment of the special character, distinctiveness and qualities of the various landscape types found across the district. At a strategic level, it divides West Lindsey into four Broad Landscape Character Areas in respect of scale, geology, topography, land-cover and settlement pattern. Within these categories, Saxilby falls into the Trent Valley grouping. Low-lying predominantly agricultural and historic</p>	<p><b>6.2.8 Environmental Statement-- Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> (the 'LVIA') takes account of the landscape and visual features that are part of the special character, distinctiveness and qualities of the various landscape types found across the district. The LVIA also takes account of intervisibility between the Scheme and Lincoln Castle and Lincoln Cathedral, and key sightlines along the River Trent and other water spaces.</p>

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			<p>landscapes of strong rural character, with large, flat, open fields and hedgerows providing enclosure to roads typify this wider Trent Valley area with pockets of woodland scattered intermittently. Due to the flatter nature of the landscape, there are key sightlines and views across the wider area to the Power Stations along the River Trent to the west and Lincoln Cathedral to the East as identified within the Saxilby Character Assessment 2017. All of which are sensitive to radical and rapid change or intensive development."</p>	<p>Detailed consultation with the Heritage topic experts has also been undertaken when developing the landscape and visual baseline and to assess landscape and visual effects for the LVIA in the context of heritage receptors and this is set out within <b>6.3.8.4.3 Environmental Statement-- Appendix 8.4 Consultation [APP-075]</b>.</p> <p>The extent of the Study Area has been determined in accordance with recognised LVIA methodology to encompass all receptors that may experience significant effects. In light of the nature of the surrounding terrain with some elevated viewpoints, the assessment has considered the potential for landscape and visual receptors to be affected that are close to but outside the 5km buffer area.</p> <p>Additional views within <b>6.2.8 Environmental Statement-- Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> suggested by the Canal &amp; River Trust, Lincolnshire County Council and Bassetlaw District Council that take account of locations where heritage assets may be affected are taken into account at Section 8.2 of chapter 8. This includes viewpoint VP35 that is representative of views from the Fosdyke Canal, in addition to viewpoints VP35 and VP49 which are next to water spaces. This assessment has included boaters as a receptor at low speed as</p>

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				<p>their users are likely to be impacted, as well as walkers and horse riders. In addition, boaters mooring on the Fosdyke Canal, who may be in situ for long term, are also taken into account in the LVIA.</p> <p>The LVIA has also included views from the River Trent as a visual receptor, with viewpoints VP49 and LCC-C-K, which are representative viewpoints along this river corridor. For West Burton 3, Bassetlaw District Council also suggested adding Torksey Viaduct as viewpoint LCC-C-N, given it sits at a higher elevation.</p> <p>The LVIA at section 8.5 has also taken account of recognised documents and guidance such as The Historic Landscape Character Assessment of the County of Lincolnshire (September 2011) to ensure the Scheme has been designed in a way that is sensitive to the historic landscape. The relevant section for the Scheme is TVL1 – The Northern Cliff Foothills.</p> <p>There are potential long-distance views to Lincoln Cathedral and Lincoln Castle and while Lincoln lies approximately 8.5km to the southeast of West Burton 1 and West Burton 2, the intervisibility between the Sites and the Study Area have been taken into consideration in the LVIA (paras. 8.4.11 and 8.5.77).</p>

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				'LVIA specific' consultation has been undertaken and it was agreed that the East Midlands Regional Landscape Character Assessment, the West Lindsey District Landscape Character Assessment and The Historic Landscape Character Assessment of the County of Lincolnshire (September 2011) would provide sufficient and relevant baseline for the LVIA.
SIPC-11	<p>Alternatives and Design Evolution</p> <p>Site Description</p> <p>Cultural Heritage</p>	Scale of Development and Heritage Impact	"This application stretches far beyond the boundary of Saxilby with Ingleby and affects the historic settlements of Brampton, Torksey, Broxholme, Willingham, Stow, Sturton by Stow and up to areas like Glentworth all of which have significant heritage assets."	<p><b>6.3.13.5 Environmental Statement-- Appendix 13.5 Heritage Statement [APP-117 to APP-119],</b> provides a detailed assessment of all Grade II Listed Buildings and Conservation Areas within 2km of the Scheme, and all Grade I and II* Listed Buildings and Scheduled Monuments within a 5km study area surrounding the Scheme.</p> <p><b>6.2.13 Environmental Statement-- Chapter 13 Cultural Heritage [APP-051]</b> (Tables 13.32 and 13.33) conclude that in Brampton there would be <i>Slight Adverse</i> residual effects to one Grade II Listed Building and two non-designated historic buildings during the construction phase. At Torksey it is concluded that there would be <i>Slight Adverse</i> residual effects to one non-designated historic building during the construction phase. In Broxholme it was concluded that there would be <i>Slight Adverse</i> residual effects to five Listed Buildings and one Scheduled Monument during</p>

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				the construction phase and one Listed Building during the operational phase. At Stow it was concluded that there would be <i>Slight Adverse</i> residual effects to three non-designated historic buildings during both the operational and decommissioning phases. No impacts to historic buildings or Scheduled Monuments were identified at Sturton by Stow, and as Glentworth is located c.9km to the north-east of the Scheme (at its nearest point) it is considered that there would be no adverse effects from the Scheme at this distance.
SIPC-12	<p>Alternatives and Design Evolution</p> <p>Site Description</p> <p>Landscape and Visual Impact</p> <p>Glint and Glare</p>	Scale of Development	"The impact of such a scale of development will lead to a concentration of solar panel infrastructure and, in some locations, nearly an unbroken sea of artificial structures and reflective glare."	<p>Further information on the design process is provided within <b>6.2.5 Environmental Statement-- Chapter 5 Alternatives and Design Evolution [APP-043]</b>, which sets out that the Applicant has followed a step by step site selection process which demonstrates the location of the Scheme is suitable for a large scale solar farm. This has included the avoidance of sensitive landscape and environmental designations in confirming the site suitability and consideration of alternative sites (para. 5.2.7). There is a requirement to avoid significant harm and development within nationally designated landscapes as set out in section 5.9 of NPS EN1</p> <p>Glint and glare impacts upon nearby receptors are assessed in detail within the <b>6.3.16.1 Environmental Statement - Appendix 16.1</b></p>



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				<p><b>Solar Photovoltaic Glint and Glare Study [APP-132]</b> and summarised in <b>6.2.16 Environmental Statement – Chapter 16 Glint and Glare [APP-054]</b>. The details of the Scheme and its impacts have been shared with the key consultees. Their responses are set out in Table 16.1 <b>[APP-054]</b>. For those receptors that are predicted to experience a “Moderate” impact the Applicant is committed to implement mitigation to reduce the effects to acceptable levels, these are set out in Section 16.6 and 16.8 <b>[APP-054]</b>, and in Table 3.5 of <b>7.14_A Outline Operational Environmental Management Plan Revision A [EN010132/EX1/WB7.14_A]</b> which is secured by Requirement 14 in Schedule 2 of the <b>dDCO [EN010132/EX1/WB3.1_A]</b>.</p>
SIPC-13	<p>Energy Need</p> <p>Principle of Development</p> <p>Landscape and Visual Impact</p> <p>Ecology and Biodiversity</p>	<p>Visual and Ecological Cost of Meeting Energy Need</p>	<p>“The environmental objective of developing renewable energy through large solar farms should not come at the expense of the beauty, character, biodiversity and tranquillity of the countryside, especially in those flatter, more open landscapes where more industrial developments are harder to hide or more difficult to mitigate. In fact, it is difficult to envisage how such a scheme can be mitigated simply due to its sheer expanse.”</p>	<p>Section 3.3 of <b>7.11 Statement of Need [APP-320]</b> describes Government's view that large capacities of low-carbon generation will be urgently required to meet increased demand and replace output from retiring (fossil fuel) plants, and that “a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar”.</p> <p>It is the Applicant's view (and this aligns with Government's view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p>

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				<p>Section 7 of <b>7.5 Planning Statement [APP-313]</b> concludes with a consideration of the Planning Balance and justifies how the overwhelming national need, as demonstrated in the Statement of Need outweighs any potential significant adverse impacts which, as the <b>Environmental Statement [APP-039 to APP-061]</b> sets out, are limited.</p> <p>Further information on the design process is provided within <b>6.2.5 Environmental Statement-- Chapter 5 Alternatives and Design Evolution [APP-043]</b>, which sets out that the Applicant has followed a step by step site selection process which demonstrates the location of the Scheme is suitable for a large scale solar farm. This has included the avoidance of sensitive landscape and environmental designations in confirming the site suitability and consideration of alternative sites (para. 5.2.7). There is a requirement to avoid significant harm and development within nationally designated landscapes as set out in section 5.9 of NPS EN1</p> <p>Section 9.6 of <b>6.2.9 Environmental Statement-- Chapter 9 Ecology and Biodiversity [APP-047]</b> sets out the extensive findings of all ecological investigations undertaken within the Order Limits together with an appraisal of the relative importance of each species or species group, habitat or designated site. A comprehensive</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>package of mitigation measures has been identified, in tandem with embedded mitigation (see Section 9.6) which is secured through the ecologically sensitive design of the Scheme (and includes measures such as the wide buffering of all field boundaries and the use of existing hedgerow gaps for accesses). These measures have been further detailed within <b>7.17 Outline Ecological Protection and Mitigation Strategy [APP-326]</b> and <b>7.3_A Outline Landscape and Ecological Management Plan Revision A [EN010132/EX1/WB7.3_A]</b> which will ensure that all identified impacts are minimised as far as possible. In many cases, the reversion from intensive agriculture to pasture or meadow grassland with additional hedgerow, scrub, tree and wetland habitat creation will bring about positive effects for wildlife. In particular, terrestrial and aquatic invertebrates, botanical diversity, small mammals and many species of bird all stand to benefit as set out in Section 9.7 in <b>6.2.9 Environmental Statement - Chapter 9 Ecology and Biodiversity [APP-047]</b>.</p>
SIPC-14	Soils and Agriculture Socio-economics,	Agricultural Economy and Food Production	<p>"This part of Lincolnshire provides a significant contribution towards food production for the wider economy. In fact, Lincolnshire is widely known as the 'Bread Basket' of the UK due to the quantity (12%) of food produced and the quality of its agricultural land. Agriculture forms the</p>	<p>The Applicant recognises the significance of the agricultural industry in the local economy and has assessed the economic impact of the Scheme in Section 18.7 of <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b> and the direct impacts on</p>

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	Tourism and Recreation		backbone of the local economy and contributes significantly towards the rural character of the Parish and wider area."	<p>local agriculture in Sections 19.9 and 19.10 of <b>6.2.19 Environmental Statement – Chapter 19 Soils and Agriculture [APP-057]</b>.</p> <p>The Scheme is anticipated to lead to a maximum loss of approximately 13 full-time equivalent agriculture jobs, as stated in paragraph 18.7.15 of document <b>6.2.18 Environmental Statement – Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b>. The Scheme is estimated to employ 8 full-time equivalent employees from the local area during operation; see Table 18.16. The net change in employment in the local area (defined as West Lindsey and Bassetlaw Districts) during the Scheme's operational life is a loss of approximately 2 full-time jobs, once consideration of direct, indirect and induced employment, and impacts on the tourism and recreation industry are considered (see para. 18.7.81). Overall, the economic benefit to the local area is estimated to be £1.5 million per year (see para. 18.7.99).</p> <p>The overall employment and economic benefit to the local area from the two-year construction period is anticipated to be 432 full-time equivalent jobs (see para. 18.7.23), generating £20.0 million per year (see para. 18.7.52).</p> <p>The land included in the Scheme covers 4 farm businesses, all of which are owner occupiers of</p>

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				the land within the Sites comprising the Scheme. This is detailed in full in para. 7.1.1-29 of <b>6.3.19.1 Environmental Statement – Appendix 19.1 Agricultural Land Quality, Soil Resources and Farming Circumstances Report [APP-137]</b> .
SIPC-15	<p>Alternatives and Design Evolution</p> <p>Energy Need</p> <p>Soils and Agriculture</p> <p>Planning Policy</p>	Loss of BMV Land	<p>“The proposed loss of this agricultural land across the area which is mostly Grade 1, 2 and 3a will ultimately change agricultural practices and the agricultural history of the Parish and wider area forever. Grade 1, 2 and 3a farmland is in itself a major renewable energy resource as well as supporting the supply of food, and is defined as being ‘the Best and Most Versatile (BMV) agricultural land in the NPPF. It is undesirable to take one renewable energy resource out of effective use in order to develop another.”</p>	<p>Section 3.3 of <b>7.11 Statement of Need [APP-320]</b> describes Government's view that large capacities of low-carbon generation will be urgently required to meet increased demand and replace output from retiring (fossil fuel) plants, and that “a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar”.</p> <p>It is the Applicant's view (and this aligns with Government's view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p> <p>Table 7.1 <b>[APP-320]</b> shows the electricity generated per Ha by different low carbon technologies. At the UK's average solar load factor (11%), solar generation produces much more energy per Ha than biogas, and generates a similar amount of energy as onshore wind.</p> <p>Paragraph 7.6.9 <b>[APP-320]</b> describes Government's anticipated range of 2 to 4 acres for each MW of output generally required for a solar farm along with its associated infrastructure. The Scheme as proposed will</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>deliver a large-scale solar generation asset which is consistent with this range.</p> <p>Section 7 of <b>7.5 Planning Statement [APP-313]</b> concludes with a consideration of the Planning Balance and justifies how the overwhelming national need, as demonstrated in the Statement of Need outweighs any potential significant adverse impacts which, as the <b>Environmental Statement [APP-039 to APP-051]</b> sets out, are limited.</p> <p>Agricultural land will not be permanently lost to the proposed Scheme, and agricultural production can be maintained through its operational phase through uses such as the grazing of sheep. Energy crops can be and are grown on agricultural land. However such crops produce fewer MWh per hectare than solar PV. It is the Applicant's view that attempting to meet renewable energy need with energy crops instead of solar PV will therefore result in a greater displacement of food crops.</p>
SIPC-16	Alternatives and Design Evolution Energy Need Soils and Agriculture	Siting and Land Management	<p>"Poorer quality land, brownfield land or retrofitting existing building roof-space should be used in preference to higher quality land, and the BMV agricultural land (grades 1, 2 and 3a) should be avoided. Where possible and viable, agricultural activity and other environmental/land</p>	<p>Section 3.3 of <b>7.11 Statement of Need [APP-320]</b> describes Government's view that large capacities of low-carbon generation will be urgently required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent</p>

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			<p>management services should be able to continue."</p>	<p>system in 2050 is likely to be composed predominantly of wind and solar".</p> <p>Section 7.6 <b>[APP-320]</b> analyses the potential contribution of "brownfield" solar sites to the national need for solar generation. Brownfield sites, including rooftop and other community energy systems, are likely to grow in the UK and will make a contribution to the decarbonisation of the UK energy system. However, the Statement of Need concludes that on their own, brownfield developments are unlikely to be able to meet the national need for solar. Section 8.5 <b>[APP-320]</b> describes and agrees with Government's view that decentralised and community energy systems are unlikely to lead to the significant replacement of large-scale infrastructure. It is the Applicant's view (and this aligns with Government's view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p> <p>Paragraph 7.6.9 <b>[APP-320]</b> describes Government's anticipated range of 2 to 4 acres for each MW of output generally required for a solar farm along with its associated infrastructure. The Scheme as proposed delivers a large-scale solar generation asset which is consistent with this range.</p>

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				In addition, the agricultural land can remain in productive use through the operational period of the Scheme by, for example, being grazed by livestock (see paras 19.3.3, 19.3.4, 19.10.2, 19.10.6, 19.10.10 of <b>6.2.19 Environmental Statement - Chapter 19 Soils and Agriculture [APP-057]</b> ).
SIPC-17	Ecology and Biodiversity Planning Policy	Impacts on Existing Ecology	"The wide open greenfield land supports an abundance of wildlife. The network of waterways, woodlands and hedgerows are home to a number of native species. These habitats are sensitive to change and provide a series of green corridors for animals to move between habitats. The Parish Council will not support large scale solar PV arrays on sites with high ecological importance. Solar PV arrays will have implications for habitat loss, fragmentation and modification and for displacement of species. The NPPF sets out the approach to ecology in the planning process through a number of guiding principles."	Section 9.6 of <b>6.2.9 Environmental Statement - Chapter 9 Ecology and Biodiversity [APP-047]</b> sets out the extensive findings of all ecological investigations undertaken within the Order Limits together with an appraisal of the relative importance of each species or species group, habitat or designated site. A comprehensive package of mitigation measures has been identified, in tandem with embedded mitigation (see Section 9.6) which is secured through the ecologically sensitive design of the Scheme. This includes the wide buffering of all higher value habitats such field boundaries, waterways and woodlands.  The mitigation measures have been further detailed within <b>7.17 Outline Ecological Protection and Mitigation Strategy [APP-326]</b> and <b>7.3_A Outline Landscape and Ecological Management Plan Revision A [EN010132/EX1/WB7.3_A]</b> which will ensure that all identified impacts are minimised as far as possible. In many cases, the reversion from



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				<p>intensive agriculture to pasture or meadow grassland with additional hedgerow, scrub, tree and wetland habitat creation will bring about positive effects for wildlife. In particular, terrestrial and aquatic invertebrates, botanical diversity, small mammals and many species of bird all stand to benefit as set out in Section 9.7 in <b>6.2.9 Environmental Statement - Chapter 9 Ecology and Biodiversity [APP-047]</b>.</p> <p>In this way, a substantial net gain for biodiversity will be achieved (see <b>6.3.9.12 Environmental Statement - Appendix 9.12 Biodiversity Net Gain Report [APP-088]</b>), predominantly through the creation of extensive low-input grassland resulting in a net gain of 86.80% in habitat units, but also several new ponds and wetland habitat parcels resulting in a net gain of 33.25% in river units, and the planting of several kilometres of species-rich hedgerow resulting in a net gain of 54.71% in hedgerow units.</p>
SIPC-18	Ecology and Biodiversity	Ecological Impacts from the Scheme	"The potential impact from all stages of the development, including construction, operation and decommissioning stages, will need to be addressed. Ecological impact assessments, including specific protected species surveys, may need to be submitted to inform planning decisions. These should follow best practice	<b>6.2.9 Environmental Statement - Chapter 9 Ecology and Biodiversity [APP-047]</b> sets out the extensive findings of all ecological investigations undertaken within the Order Limits together with an appraisal of the relative importance of each species or species group, habitat or designated site. This survey scope has been formulated

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			<p>guidelines and refer to the Natural England Standing Advice. They should also inform and influence the design to ensure potential adverse impacts are mitigated and to maximise biodiversity enhancement opportunities to encourage more wildlife to thrive within the area and protect those species that are endangered."</p>	<p>through consultation and engagement with Natural England as well as Lincolnshire and Nottinghamshire Wildlife Trusts and has deemed to be thorough and appropriate. The extent of consultation between the parties is set out in Section 9.21 in <b>6.2.9 Environmental Statement – Chapter 9 Ecology and Biodiversity [APP-047]</b>.</p> <p>A comprehensive package of mitigation has been provided, in tandem with embedded mitigation which is secured through the ecologically sensitive design of the Scheme (and includes measures such as the wide buffering of all field boundaries and the use of existing hedgerow gaps for accesses).</p> <p>ES Chapter 9 <b>[APP-047]</b> assesses potential impacts from all stages of the development, including construction, operation and decommissioning stages.</p> <p>Habitat enhancements are detailed within <b>7.3_A Outline Landscape and Ecological Management Plan Revision A [EN010132/EX1/WB7.3_A]</b> which includes the large-scale reversion of arable land to meadow with additional hedgerow, scrub, tree and wetland habitat creation which will bring about positive effects for wildlife.</p>

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SIPC-19	Ecology and Biodiversity  Landscape and Visual Impact	Suitability of Ecological Mitigation Measures	"The implementation of an ecological mitigation/management/monitoring plan can result in Solar PV arrays delivering environmental gains such as the creation of enhanced wildlife habitats including wildflower meadows, hedgerows and woodland buffers. However these may not always be appropriate in terms of landscape character and advice should be sought from the District and other relevant authorities when preparing these plans."	<p>Habitat enhancements are detailed within <b>7.3_A Outline Landscape and Ecological Management Plan Revision A [EN010132/EX1/WB7.3_A]</b> which includes the large-scale reversion of arable land to meadow with additional hedgerow, scrub, tree and wetland habitat creation which will bring about positive effects for wildlife.</p> <p>Planting mitigation can be found within ES Figure 8.18.1 to Figure 8.18.3 <b>[WB6.4.8.18.1_A to WB6.4.8.18.3_A]</b> that illustrate the existing hedgerows and key areas of mitigation within the Scheme. The Applicant and its LVIA consultants at Lanpro have worked closely with the ecology consultant throughout the application process to inform the LVIA and associated mitigation plans to ensure that both complement each other.</p> <p>The Landscape and Visual Impact Assessment (LVIA) contained within <b>6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> takes into account the effects on the landscape character in detail, from the national scale, through regional, county district and local scales to the landscape character areas within the 5km Study Area. For further information, please refer to <b>6.3.8.2 Environmental Statement - Appendix 8.2 Assessment of Potential Landscape Effects [APP-073]</b>. These associated appendices provide</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>a detailed assessment of landscape effects on each landscape receptor.</p> <p>Mitigation, including offsets and planting, has been proposed to address and minimise adverse effects on the character of the landscape. This is in line with the agreed methodology and the hierarchy of approach advocated by the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition and relevant published landscape character assessments. The mitigation was also agreed with Lincolnshire County Council at the series of workshops, as set out in <b>6.3.8.4 Environmental Statement - Appendix 8.4 Consultation [APP-075]</b>.</p>
SIPC-20	<p>Landscape and Visual Impact</p> <p>Glint and Glare</p> <p>Transport and Access</p>	Visual and Glint and Glare Impacts	<p>"Solar farms will impact nearby residents, particularly those in Ingleby, and the wider local community hosting the development. Concerns about loss of amenity, visual impact including glint and glare from panels and linked to this road safety will need to be appropriately considered as part of determining the acceptability of the development."</p>	<p>The Applicant notes this comment.</p> <p><b>6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> (the 'LVIA') considers both the landscape and visual effects of the Scheme, including the implications of other related topics such as glint and glare.</p> <p>Glint and glare impacts road safety are assessed in detail within the <b>6.3.16.1 Environmental Statement - Appendix 16.1 Solar Photovoltaic Glint and Glare Study [APP-132]</b> and summarised in <b>6.2.16 Environmental Statement - Chapter 16 Glint and Glare [APP-054]</b>. The details of the Scheme and its impacts</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>have been shared with the key consultees. Their responses are set out in Table 16.1 [APP-054]. For those receptors that are predicted to experience a "Moderate" impact the Applicant is committed to implement mitigation to reduce the effects to acceptable levels, these are set out in Section 16.6 and 16.8 [APP-054], and in Table 3.5 of <b>7.14_A Outline Operational Environmental Management Plan Revision A [EN010132/EX1/WB7.14_A]</b> which is secured by Requirement 14 in Schedule 2 of the <b>dDCO [EN010132/EX1/WB3.1_A]</b>.</p> <p>The landscape mitigation measures include new planting, including new native hedgerows and tree cover,. The LEMP also includes provisions for their management and maintenance.</p>
SIPC-21	<p>Other Environmental Matters (Human Health / Major Accidents and Disasters)</p> <p>Air Quality</p> <p>Noise and Vibration</p>	BESS Fire Safety	"There are also health impacts associated with such schemes where lithium battery storage facilities are also being proposed such as fire, noise and air pollution."	<p>The Applicant has submitted <b>7.9 Outline Battery Storage Safety Management Plan [APP-318]</b> and, through <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>, has secured by Requirement 6 of Schedule 2 that "Work No. 2 must not commence until a battery storage safety management plan has been submitted to and approved by the relevant planning authority."</p> <p>Paragraph 4.1.18 of <b>7.9 Outline Battery Storage Safety Management Plan [APP-318]</b> explains that the design of the BESS has integrated fire</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>detection and suppression systems that will automatically operate to contain battery fires. Paragraph 5.3 states that if fire spreads to multiple units, external firefighting water facilities are available by means of 228,000 litre water storage tanks within the battery compounds.</p> <p>Human health and other environmental impacts resulting from plumes from potential battery fires have been initially assessed in <b>6.2.17 Environmental Statement - Chapter 17 Air Quality [APP-055]</b> and are proposed to be supplemented by additional information during the examination process.</p> <p>Risks to human health as a result of fires or unconfined explosions within the BESS compound are set out in paragraphs 21.6.42 to 21.6.48 of <b>6.2.21 Environmental Statement - Chapter 21 Other Environmental Matters [APP-059]</b> which concludes that there is no significant risk of harm to human health due to the physical separation of the BESS compound from publicly accessible areas.</p> <p>The likely impacts of noise and vibration, including any anticipated impacts to residential properties, have been assessed in Section 15.7 of <b>6.2.15 Environmental Statement - Chapter 15 Noise and Vibration [APP-056]</b>. The noise and</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				vibration effects are not anticipated to be significant.
SIPC-22	General (Consultation)	Adequacy of Consultation	<p>"The Parish Council consider that, for such a large project, there has been inadequate public consultation with only two events being held within Saxilby itself. One of these events clashed with the Lincolnshire Show. The developers have also only met with the Parish Council virtually despite several requests for individual face-to-face meetings. The Parish Council considers that community involvement should be an integral part of the development process. The local community should be consulted by the developer at the conceptual stage with more than just a couple of meetings, ideally utilising local exhibitions and presentations where community views can be sought and recorded. To support this statement, the Parish Council organised a Public meeting on the 17th January 2023 to seek residents' views on the proposal and make sure local views have been considered."</p>	<p>Throughout the consultation process the Applicant has welcomed feedback from a range of stakeholders, including communities, landowners and occupiers, on the Scheme proposals. The outcome of this consultation and engagement is evidenced in <b>5.1 Consultation Report [APP-022]</b>, which was submitted to the Planning Inspectorate and accepted for examination.</p> <p>For example, Table 1.1 of Chapter 1 <b>[APP-022]</b>, details how the cable route corridor for the Scheme has been refined through engagement and consultation with landowners and the community.</p> <p>Table 1.2 of Chapter 1 <b>[APP-022]</b>, details how the Applicant provided consultation documents to landowners to inform them regarding upcoming statutory consultation and methods to provide feedback.</p> <p>Chapter 4 <b>[APP-022]</b> details how the Applicant undertook early engagement with consultees. Table 4.1 details the early engagement meetings which took place between the Applicant and the relevant stakeholders. This table includes the dates of two meetings with Saxilby with Ingleby Parish Council and a summary of what was</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>discussed at the meetings. Table 4.2 details the meetings which took place between the Applicant and near neighbours to the Scheme. Included in this table are the dates the stakeholders met representatives of the Applicant and a summary of what was discussed at the meetings.</p> <p>Table 5.2 within Chapter 5 <b>[APP-022]</b> details the public information events which took place for the first phase of community consultation. The table includes the date, venue and number of attendees to each information event.</p> <p>Chapter 7 <b>[APP-022]</b> describes the Applicant's approach to statutory consultation, including consulting with relevant authorities on a draft Statement of Community Consultation. Table 7.1 sets out the comments received from authorities on the Applicant's approach to consultation and how these were considered by the Applicant. Table 7.3 in Chapter 7 describes how the Applicant complied with commitments made in the Statement of Community Consultation when undertaking statutory consultation.</p> <p>Chapter 8 <b>[APP-022]</b> describes how the Applicant undertook a six-week statutory phase two consultation on the Scheme, to provide communities, stakeholders and landowners a sufficient period of time to provide feedback. A Consultation Summary Report for this phase of</p>



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>statutory consultation was published on the dedicated Scheme website, shared with elected representatives and stakeholders and issued to over 9,000 properties within the vicinity of the Scheme, to help consultees understand how their feedback was being considered. A copy of the Phase Two Consultation Summary Report is provided as <b>5.7 Appendix 5.7: Phase Two Community Consultation Materials [APP-029 to APP-031]</b>.</p> <p>This chapter further details the public information events which took place for the second phase of community consultation. Table 8.2 includes the date, venue and number of attendees to each information event during this phase of consultation.</p> <p>Chapter 11 of <b>5.1 Consultation Report [APP-022]</b> describes the significant volume of responses received to Section 47 consultation (local community), including the issues raised and how these were considered by the Applicant. This is further evidenced by <b>5.12 Appendix 5.12: Consultation Report Appendix – Section 47 Applicant Response [APP-036]</b>.</p> <p>Chapter 12 of <b>5.1 Consultation Report [APP-022]</b> describes the significant volume of responses received to the Section 42 consultation (statutory stakeholders), including the issues</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>raised and how these were considered by the Applicant. This is further evidenced by <b>5.13 Appendix 5.13: Consultation Report Appendix – Section 42 Applicant Response [APP-037]</b>.</p> <p>The host authorities have confirmed that the statutory consultation process was adequate through their <b>Adequacy of Consultation Representations [AoC-001 to AoC-013]</b>.</p>
SIPC-23	Principle of Development	Community Benefits	<p>"The opportunities for community gain are encouraged and should be explored as part of developing projects. Such opportunities can include:</p> <ul style="list-style-type: none"> <li>• Establishing a Community Benefits Trust with funds being contributed annually by the developer for local projects for the lifetime of the project.</li> <li>• Local or community ownership of panels.</li> <li>• Local share issue.</li> <li>• Investment in green infrastructure such as public rights of way provision and management."</li> </ul>	<p>The Applicant is committed to providing a Community Benefit Fund (see paragraph 4.8.1 of <b>7.5 Planning Statement [APP-313]</b>). This fund will be available for community-based benefits such as (but not limited to) community-led energy related projects. No further details were given as a part of the Application because the fund will be progressed separately from the Application and it will not be taken into account in the planning balance. The Applicant is working with the Host Authorities to identify an appropriate mechanism for the funding to be distributed. Further updates on this matter will be provided during the examination.</p> <p>The Applicant has also been in discussions with Saxilby Nature Project to agree the inclusion of habitat management land for community use in the DCO application.</p> <p>A total of 0.8ha of land has been allocated as a habitat management area (Work No.10 in</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>Schedule 1 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>). This area has been designed to assure it aligns with the objectives of Saxilby Nature Project and their neighbouring Hardwick Scrub site (see para. 4.5.90 of <b>6.2.4 Environmental Statement - Chapter 4 Scheme Description [APP-042]</b>).</p> <p>Any financial contributions towards the use of this land by Saxilby Nature Project will be agreed outside the scope of the DCO through the Community Benefit Fund, as described in paragraph 4.8.1 of <b>7.5 Planning Statement [APP-313]</b>.</p> <p>Paragraph 4.6.1 of <b>7.5 Planning Statement [APP-313]</b> goes on to explain that a new permissive path from Track off Sykes Lane along the Codder Lane Belt and then south and west to rejoin Sykes Lane opposite Hardwick Scrub will be in place during the operational phase of the Scheme, thus improving local amenity.</p>
SIPC-24	Principle of Development Energy Need	Location and Need for Development	<p>"Saxilby with Ingleby Parish Council, is in principle, not supportive of the installation of a large scale solar farm within the Parish. Development should be appropriate to the locality and avoid adverse planning and environmental impacts. The Parish Council does not consider that the need for renewables should</p>	<p>Section 7.5 of <b>7.11 Statement of Need [APP-320]</b> describes how suitable locations for large-scale solar are identified and assessed. Paragraph 7.5.2 outlines the broad criteria for determining Site suitability.</p> <p>Figure 7.4 <b>[APP-320]</b> shows the level of photovoltaic power potential at the proposed</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>automatically override environmental protections and an application will only be supported if the impact is or can be made acceptable.”</p>	<p>location. Section 9 describes the advantages of connecting large-scale solar to the existing and robust National Electricity Transmission System at the proposed Point of Connection at West Burton Power Station, and Paragraph 9.4.4 concludes that the Scheme will contribute to national system adequacy and decarbonisation targets.</p> <p><b>6.2.5 Environmental Statement - Chapter 5 Alternatives and Design Evolution [APP-043]</b> and its accompanying appendix <b>WB6.3.5.1_A Environmental Statement - Appendix 5.1 Site Selection Assessment Revision A [AS-004]</b> explain how the Sites for the Scheme were chosen in light of the identified need for large scale solar.</p> <p>Specifically, paragraph 2.1.10 <b>[AS-004]</b> explains the reasons why a site of the size proposed is required to meet the 480MW grid connection offer which the Applicant holds. The methodology used for the site selection process is considered reasonable and proportionate and complies with the requirements of NPS EN-1 4.4.3 as explained at Section 2.1 <b>[AS-004]</b>.</p> <p>The Scheme's compliance with national and local planning policy is detailed in <b>7.5 Planning Statement [APP-313]</b>. It is concluded that the</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>benefits of the Scheme outweigh its adverse impacts (para. 7.1.14 [APP-313]).</p> <p>Furthermore, the <b>Environmental Statement [APP-039 to APP-061]</b> details the beneficial and adverse environmental effects anticipated from the Scheme, with those that are both significant beneficial and adverse effects summarised at <b>6.2.23_A Environmental Statement - Chapter 23 Summary of Significant Effects Revision A [EN010132/EX1/WB6.2.23_A]</b>.</p>
SIPC-25	Energy Need Alternatives and Design Evolution	Alternative Siting	<p>"As a preference, the Parish Council will support solar arrays mounted on existing roofs or integrated into new roofs/buildings. Developments on previously developed and/or contaminated and industrial land are also preferable. Community owned projects would be particularly welcomed."</p>	Please refer to Applicant's Response to SIPC-16
SIPC-26	Landscape and Visual Impact	Landscape Character Designations	<p>"The Parish Council will not support the development of large scale Solar PV arrays in areas identified for their special character or other importance."</p>	Please refer to Applicant's Responses to SIPC-10 & 11
SIPC-27	Ecology and Biodiversity  Cultural Heritage	Existing Designations and Constraints	<p>"The Parish Council will not support large scale solar PV arrays on sites with ecological importance, archaeological or historic interest, or classified as the best and most versatile grades of agricultural land (1, 2, and 3a)."</p>	Please refer to Applicant's Responses to SIPC-14-15, 17-19

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
	Soils and Agriculture Alternatives and Design Evolution			
SIPC-28	Landscape and Visual Impact	Landscape Impact and Mitigation	"For greenfield proposals outside of protected areas, the Parish Council expect proposals to demonstrate the landscape's suitability to receive such a development. Proposals must show how the design of the scheme has accounted for landscape character. Developments should avoid both landscape and visual impacts, or demonstrate appropriate mitigation."	Please refer to Applicant's Response to SIPC-13 & 20
SIPC-29	Principle of Development Soils and Agriculture Ecology and Biodiversity	Land Management	"In addition, land management around panels should allow for continued agricultural use and/or encourage biodiversity improvements."	Please refer to Applicant's Response to SIPC-03-05, 08 and 13-19
SIPC-30	Principle of Development	Cumulative Impacts	"In formulating its views on proposals, the Parish Council has regard to cumulative impacts of multiple solar arrays on landscape character and visual amenity. The impact from a single development when combined with other impacts from similar developments could have a much wider impact within the area, as is the case here."	Please refer to Applicant's Response to SIPC-109

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
SIPC-31	General (Consultation)	Community Engagement	"The consultation and involvement of local communities should be an integral part of the development process and the Parish Council believe that the recent consultation was insufficient in terms of providing clear and meaningful engagement with all sectors of the community."	Please refer to Applicant's Response to SIPC-22

**Table 2.4.9: Applicant's Response to Scampton Parish Council [RR-300]**

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
ScPC-01	Other Environmental Matters (Major Accidents and Disasters)	BESS Safety	"Concerns with the safety of battery storage."	<p>The Applicant has submitted <b>7.9 Outline Battery Storage Safety Management Plan [APP-318]</b> and, through <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>, has secured by Requirement 6 of Schedule 2 that "Work No. 2 must not commence until a battery storage safety management plan has been submitted to and approved by the relevant planning authority."</p> <p>Paragraph 4.1.18 of <b>7.9 Outline Battery Storage Safety Management Plan [APP-318]</b> explains that the design of the BESS has integrated fire detection and suppression systems that will automatically operate to contain battery fires. Paragraph 5.3 states that if fire spreads to multiple units, external firefighting water facilities are available by means of 228,000 litre water storage tanks within the battery compounds.</p> <p>Human health and other environmental impacts resulting from plumes from potential battery fires have been initially assessed in <b>6.2.17 Environmental Statement - Chapter 17 Air Quality [APP-055]</b> and are proposed to be supplemented by additional information during the examination process.</p> <p>Risks to human health as a result of fires or unconfined explosions within the BESS</p>



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				compound are set out in paragraphs 21.6.42 to 21.6.48 of <b>6.2.21 Environmental Statement – Chapter 21 Other Environmental Matters [APP-059]</b> which concludes that there is no significant risk of harm to human health due to the physical separation of the BESS compound from publicly accessible areas.
ScPC-02	Other Environmental Matters (Human Health)  Principle of Development	Cumulative Impact on Mental Health	"The amount of solar farm applications in Lincolnshire and the effects on local residents mental health."	The Applicant is cognisant of the significance of the countryside for physical and mental wellbeing and, as such, likely impacts on the desirability and use of recreational facilities in the countryside, such as public rights of way, have been assessed in Section 18.7 of <b>6.2.18 Environmental Statement – Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b> . The greatest level of effect to access, desirability and use of recreational facilities is limited to short- to medium-term moderate adverse effects on long distance recreational routes (the Trent Valley Way and National Byways) during construction (see Table 18.15 and para. 18.7.62). This is a <b>significant adverse</b> effect. This is however the only significant effect anticipated, with no greater than moderate-minor adverse anticipated to any other recreational receptor during construction (see paras. 18.7.60 to 18.7.69), or to any recreational receptor during operation (see paras. 18.7.107 to 18.7.117) and decommissioning (see paras. 18.7.147 to

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>18.7.157). These effects are not anticipated to be significant.</p> <p>This is re-iterated in Section 21.5 of <b>6.2.21 Environmental Statement – Chapter 21 Other Environmental Matters [APP-059]</b>.</p>
ScPC-03	Energy Need Soils and Agriculture	Use of Agricultural Land	<p>"[Concern with...] The amount of good quality agricultural land being proposed for these applications, especially with a cost of living crisis and potential food shortages, now and in the future."</p>	<p>Section 3.3 of <b>7.11 Statement of Need [APP-320]</b> describes Government's view that large capacities of low-carbon generation will be urgently required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar".</p> <p>It is the Applicant's view (and this aligns with Government's view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p> <p>Paragraph 7.6.9 <b>[APP-320]</b> describes Government's anticipated range of 2 to 4 acres for each MW of output generally required for a solar farm along with its associated infrastructure. The Scheme as proposed will deliver a large-scale solar generation asset which is consistent with this range.</p> <p>Further, there is a benefit to all UK electricity consumers from the UK producing more clean, renewable electricity, in terms of affordability and</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>energy security and resilience. This is considered further in detail in Sections 7.4, 8.7, 8.8, 8.10, 10.2, 10.3 and 11.5 <b>[APP-320]</b>.</p> <p>Paragraph 8.9.5 <b>[APP-320]</b> provides a quote from the British Energy Security Strategy which demonstrates the benefit to UK consumers of developing renewable energy generation schemes on UK land: <i>"If we're going to get prices down and keep them there for the long term, we need a flow of energy that is affordable, clean and above all, secure. We need a power supply that's made in Britain, for Britain."</i></p>

**Table 2.4.10: Applicant's Response to Stow Parish Council [RR-319]**

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
StPC-01	General	Note of registration of Interest	"As part of it lays in the Stow area I would like to register for the Council. I will know if there are any comments at the next meeting."	The Applicant notes this response and awaits the Parish Council's comments.

**Table 2.4.11: Applicant's Response to Sturton by Stow Parish Council [RR-322]**

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
SSPC-01	Principle of Development Soils and Agriculture	Cumulative Scale	"This project is one of four currently under development. The project of West Burton should be considered alongside; Cottam, Gate Burton and Tillbridge Solar. The estimated land loss for these projects is circa 10000 acres."	The Applicant notes this comment.  Development of a solar farm does not result in permanent loss of or degradation to the agricultural land resource. The land can return to the current range of agricultural management options on decommissioning, and during its operational life can remain in agricultural use through activities such as livestock grazing (see paras 19.3.3, 19.3.4, 19.10.2, 19.10.6, 19.10.10 of <b>6.2.19 Environmental Statement - Chapter 19 Soils and Agriculture [APP-057]</b> ).
SSPC-02	General	Commonality of Developer	"The village of Sturton by Stow is going to be surrounded by Cottam Solar Project. West Burton is being developed by the same company."	The Applicant notes this comment.
SSPC-03	Principle of Development Soils and Agriculture	Temporary Nature of Scheme	"The developers have sought to infer that the land use is temporary and for the life of the project."	Once the Scheme ceases to operate, it will be decommissioned.  Decommissioning is estimated to be no earlier than 2066 (see paras. 3.3.15 to 3.3.18 of <b>7.5 Planning Statement [APP-313]</b> ). Decommissioning is expected to take between 12 and 24 months. A 24-month decommissioning period has been assumed for the purposes of a worst-case assessment in the ES, (See paragraph 4.3.6 of <b>6.2.4 Environmental Statement - Chapter 4 Scheme Description [APP-042]</b> ).

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
SSPC-04	Principle of Development (DCO)	Decommissioning and Restoration Safeguarding	"Why is the draft DCO being utilised to carry out CPO's of the land and cable routes. This is surely not the best way forward. What will happen to the acquired land once the project is deemed finished? How will it be repatriated to being actively farmed and not subsequently be deemed as brownfield and then developed either commercially or for housing? Safeguards need to be in place."	<p>The Applicant is seeking compulsory acquisition powers in the <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> to enable the Scheme to be delivered. <b>4.1 Statement of Reasons: Compulsory Acquisition Information [APP-019]</b> sets out the reasons why the powers sought over land are necessary and proportionate to deliver the Scheme. Wherever possible, the Applicant is seeking to enter voluntary agreements with landowners and only where this is not possible will powers of compulsory acquisition be exercised.</p> <p>The <b>7.2 Outline Decommissioning Statement [APP-310]</b> forms part of the Application. Paragraphs 2.1.1 to 2.1.8 set out decommissioning activities for the removal of all the solar panels (PV), structures, enclosures, equipment, and all other apparatus associated with the Scheme. It also sets out how roles, responsibilities and actions required in respect of implementation of the mitigation measures will be managed, along with principles for monitoring and reporting.</p> <p>The Applicant confirms that decommissioning is secured through Requirement 21 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>In addition, to restore the land to its pre-construction condition at the end of operation, the soil resource within the Order Limits will be managed through construction, operation, and decommissioning. <b>6.3.19.2 Environmental Statement Appendix 19.2 Outline Soil Management Plan [APP-138]</b> is included in the Application and it identifies measures to be implemented, through the general principles outlined in paragraph 3.1.1, to ensure the protection and conservation of soil resources maintains the physical properties of the soils during all phases of the Scheme and following decommissioning. On site information relating to the management of soil resources will be provided to the Site operators undertaking the works.</p> <p>A Soils Resource Management Plan, substantially in accordance with <b>6.3.19.2 Environmental Statement Appendix 19.2 Outline Soil Management Plan [APP-138]</b> will be submitted and approved prior to the commencement of development as secured by Requirement 19 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				In combination, the above measures are considered to provide sufficient safeguards to ensure that decommissioning of the Scheme will be undertaken to a high standard.
SSPC-05	Energy Need Soils and Agriculture	Energy Need vs. Agriculture Need	"The current hysteria over cost of utilities is being used to push this form of renewable electricity through. Whilst there is a need for a mix of renewable energy; the use of so much valuable and productive land is not feasible."	<p>Section 3.3 of <b>7.11 Statement of Need [APP-320]</b> describes Government's view that large capacities of low-carbon generation will be urgently required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar".</p> <p>It is the Applicant's view (and this aligns with Government's view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p> <p>Further, there is a benefit to all UK electricity consumers from the UK producing more clean, renewable electricity, in terms of affordability and energy security and resilience. This is considered further in detail in Sections 7.4, 8.7, 8.8, 8.10, 10.2, 10.3 and 11.5 <b>[APP-320]</b>.</p> <p>Paragraph 8.9.5 <b>[APP-320]</b> provides a quote from the British Energy Security Strategy which demonstrates the benefit to UK consumers of developing renewable energy generation schemes on UK land: "<i>If we're going to get prices down and keep them there for the long term, we</i></p>



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p><i>need a flow of energy that is affordable, clean and above all, secure. We need a power supply that's made in Britain, for Britain."</i></p> <p>Paragraph 7.6.9 <b>[APP-320]</b> describes Government's anticipated range of 2 to 4 acres for each MW of output generally required for a solar farm along with its associated infrastructure. The Scheme as proposed will deliver a large-scale solar generation asset which is consistent with this range.</p>
SSPC-06	Principle of Development (DCO)	Compulsory Acquisition Powers	<p>"The draft CPO makes reference to; Compulsory land acquisition including air and subsoil the right to removed hedgerows and trees irrespective of TPO status the rights to block and divert roads; the right to cancel any covenants and rights currently on the affected land. The right to remove any footpath. The right to transfer to another company. There is too broad a sweep and lack of detail for specific circumstances in the draft order."</p>	<p>The Applicant notes this comment and directs the Interested Party to 3.2 Draft Explanatory Memorandum <b>[APP-18]</b>. This explains in detail the purposes of each of the articles and schedules of the <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> and explains why the scope of the powers sought in the DCO is considered necessary and proportionate for the Applicant to carry out the Scheme. It is noted that the compulsory acquisition powers in the DCO can only be exercised for the purpose of carrying out the Scheme, and their exercise is limited to the land shown on the Land Plan <b>[AS-006]</b>. As noted at SSPC-04 above, the Applicant is seeking to enter voluntary agreements with landowners and only where this is not possible will powers of compulsory acquisition be exercised.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				The Applicant also directs the Interested Party to the requirements in Schedule 2 to the DCO [APP-17] and the associated outline management plans referred to therein which are designed to manage and limit how the powers in the DCO can be exercised.
SSPC-07	Ecology and Biodiversity  Hydrology, Flood Risk and Drainage	Impact of Removal of Trees and Hedgerows	"How can there be any biodiversity net gain if hedgerows and trees are felled, removed or lopped? This makes no sense. The countryside is already under great stress with a lack of migration corridors and the removal of hedgerows is something which should have special consideration; Not only for wildlife but the amount of water which these hedges and trees consume would have a tremendous impact on the areas concerned if they were to be removed."	<b>6.2.9 Environmental Statement - Chapter 9 Ecology and Biodiversity [APP-047]</b> assesses the potential impact of the Scheme on hedgerows and trees. A comprehensive package of mitigation has been provided, in tandem with embedded mitigation which is secured through the ecologically sensitive design of the Scheme (and includes measures such as the wide buffering of all field boundaries and the use of existing hedgerow gaps for accesses). The potential for loss of hedgerows and trees to the construction of the array Sites is very limited as the design process has continuously sought to refine down the number of new crossings or gaps required in existing field boundaries. It is anticipated that seven hedgerow gaps will be required during the construction and operation phases. These gaps will measure between 3-6.5m wide. In the context of the Scheme's hedgerow network which comprises approximately 45km within the Sites, such losses are proportionately extremely small. Adherence to these minor hedgerow works (pruning and removal) is set out

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>within <b>7.3_A Outline Landscape and Ecological Management Plan Revision A [EN010132/EX1/WB7.3_A]</b> and will be secured through Requirement 7 in Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p> <p>Similarly, for the cable installation works, new crossings and incursions into hedgerows have been minimised where possible through sensitive siting of the Cable Route Corridor as a result of iterative refinement. The precise route to be taken within the Cable Route Corridor has not yet been proposed, and it is acknowledged that this will be subject to future refinement as the impact of constraints such as ground conditions, vehicular access and construction practicalities cannot be completely fixed at this stage.</p> <p>Nevertheless, it is anticipated that approximately 20 locations will be subject to open-cut crossings along the Cable Route Corridor, and these are set out in a schedule of cable route crossing within <b>WB7.15_A Crossing Schedule Revision A [AS-001]</b>. The majority of species rich hedgerows have been avoided through committing to horizontal directional drilling under these hedgerows which is secured within the <b>7.17 Outline Ecological Protection and Mitigation Strategy [APP-326]</b>.</p> <p>Assuming potential gap widths of between 4.1m and 7.1m, total lengths of between approximately</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>82 and 142m of hedgerow may be affected by the cabling works, which, in the context of the entire length of the Cable Route Corridor is considered to be a minor or moderate magnitude impact. The cable route installation will result in temporary hedgerows losses, as following installation of the cable these hedgerows will be reinstated through translocation or replanting once the trench is backfilled which is secured within the <b>7.17 Outline Ecological Protection and Mitigation Strategy [APP-326]</b>.</p> <p>Consequently, such impacts are considered to be reversible, with mitigation reducing timescales from the long-term replacement (natural succession) to short to medium term, potentially with a long-term positive effect where re-planting exceeds baseline species diversity.</p> <p>Significant enhancement of hedgerows and trees is proposed which is set out within the <b>7.3_A Outline Landscape and Ecological Management Plan Revision A [EN010132/EX1/WB7.3_A]</b> (the 'oLEMP') and will be secured through Requirement 7 in Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>. This includes the planting of new trees with a total area of new woodland (approximately 13.7ha) proposed across the Scheme (para.4.4.4). The oLEMP also focuses on the gapping up of currently defunct</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>hedgerows, creation of new hedgerows (approximately 7.1km) at boundaries where none exist (para. 4.3.11). There will also be replanting around Public Rights of Way and where landscape and visual impact mitigation is required. In addition, limited opportunities for the replanting of old, removed field boundaries (where appropriate) have been pursued, historic hedgerow on West Burton 1 has been identified using 1940s Ordnance survey maps and will be re-planted (para 4.3.2).</p> <p>In this way, a substantial net gain for biodiversity will be achieved (see <b>6.3.9.12 Environmental Statement - Appendix 9.12 Biodiversity Net Gain Report [APP-088]</b>), predominantly through the creation of extensive low-input grassland resulting in a net gain of 86.80% in habitat units, but also several new ponds and wetland habitat parcels resulting in a net gain of 33.25% in river units, and the planting of several kilometres of species-rich hedgerow resulting in a net gain of 54.71% in hedgerow units.</p>
SSPC-08	General (Consultation) Principle of Development	Consultation and Community Benefits	"There has been no meaningful consultation between the developer and communities for reparation of detriment should this project be granted. Sturton by Stow Parish Council would ask that a reparation scheme does not only involve an initial lump sum, but is also in receipt of regular sums to be paid over the entire lifetime	The Applicant acknowledges this comment but is confident that the level of consultation undertaken, and information presented throughout the pre-application stage was in accordance with the Planning Act 2008 and associated guidance. This has been evidenced in <b>5.1 Consultation Report [APP-022]</b> , which was

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>of the project and that preferably the Lincolnshire Communities Fund are involved to help administer the funding. (Lincolnshire Communities Fund administer Tritton Knoll). There is much detail still not specified."</p>	<p>submitted to the Planning Inspectorate and accepted for examination.</p> <p>For example, as described in Chapter 2 <b>[APP-022]</b>, the Applicant undertook two phases of community consultation to share information and invite feedback at different stages of Scheme development.</p> <p>Chapter 7 <b>[APP-022]</b> describes the Applicant's approach to statutory consultation, including consulting with relevant authorities on a draft Statement of Community Consultation. Table 7.1 sets out the comments received from authorities on the Applicant's approach to consultation and how the Applicant has had regard to these in developing the Scheme. Table 7.3 in Chapter 7 describes how the Applicant complied with commitments made in the Statement of Community Consultation when undertaking statutory consultation.</p> <p>Chapter 8 <b>[APP-022]</b> describes how the Applicant undertook a six-week statutory phase two consultation on the Scheme, during which the Applicant presented consultees with environmental information sufficient for consultees to understand the potential likely significant effects of the Scheme in a Preliminary Environmental Impact Report (PEIR). A non-technical summary was published to accompany</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>the PEIR, with public information events and free-to-use communications channels open to help aid accessibility and understanding of the Scheme. A Consultation Summary Report for this phase of statutory consultation was published on the dedicated Scheme website, shared with elected representatives and stakeholders and issued to over 9,000 properties within the vicinity of the Scheme, to help consultees understand how their feedback was being considered. A copy of the Phase Two Consultation Summary Report is provided at pp.36-43 of <b>5.7 Consultation Report - Appendix 5.7 Phase Two Community Consultation Materials - Part 3 of 3 [APP-031]</b>.</p> <p>Chapter 11 of <b>5.1 Consultation Report [APP-022]</b> describes the significant volume of responses received to Section 47 consultation (local community), including the issues raised and how the Applicant has had regard to these in developing the Scheme. Table 11.1 of this chapter shows the questions shared to the public in the Section 47 consultation feedback form and details that Question 10b asked for feedback on community benefits. Table 11.2 provides a summary of feedback received for this question. Complete response tables for this consultation can be found in <b>5.12 Consultation Report - Appendix 5.12 - Section 47 Applicant Response [APP-036]</b>.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>The host authorities have confirmed that the statutory consultation process was adequate through their <b>Adequacy of Consultation Representations [AoC-001 to AoC-013]</b>.</p> <p>The Applicant is committed to providing a Community Benefit Fund (see paragraph 4.8.1 of <b>7.5 Planning Statement [APP-313]</b>). This fund will be available for community-based benefits such as (but not limited to) community-led energy related projects. No further details were given as a part of the Application because the fund will be progressed separately from the Application and it will not be taken into account in the planning balance. The Applicant is working with the Host Authorities to identify an appropriate mechanism for the funding to be distributed. Further updates on this matter will be provided during the examination.</p>



## 2.5 The Applicant's Responses to Persons Whose Interests would be Affected by the Order

Table 2.5.1: Applicant's Response to Catrin Fieldson [RR-038]

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
CF-01	General	Context of Relevant Representation	"Our small 350 acre family farm will effectively be surrounded by 7000 acres of solar panels for the next 40 years. I think it's obvious what the practical, social and emotional impact will be for us:"	The Applicant notes this comment. A response to each of the specific issues raised is set out below.
CF-02	Principle of Development Ecology and Biodiversity	Industrialisation and Enclosure of Land	"The proposals will effectively industrialize the countryside around us. The freedom of movement for us and wildlife will come to an end over- night. The proposed surrounding fencing will effectively coral Deer, traditionally free to roam, in ways yet to be determined or measured. Its reasonable to fear that their numbers will increase on our 350 acres as they will have limited means of escape as they will obviously also be excluded from the surrounding 7000 acres!!. There will be a negative impact over time and we have been offered no channel to deal with this consequence, should our worst fears prevail."	<b>6.2.8 ES Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> (the 'LVIA') looks to provide landscape mitigation that seeks to enhance the landscape character of the Study Area and to reduce the visibility of the Scheme from residential properties and other public vantage points including transport routes, public footpaths, permissive footpaths and green lane network. This mitigation is aimed to benefit the community as a whole as well as enhancing green infrastructure (see paras. 8.1.1 and 8.8.3).  The majority of animal species will be able to freely move through the operational site and the boundary fencing in the same way as they are currently able to in other locations where deer fencing is used. An impact on the movement of deer is likely (Bullet point 9 within paragraph 9.6.5 of <b>6.2.9 Environmental Statement - Chapter 9 Ecology and Biodiversity [APP-047]</b> , although it is acknowledged from the ecological monitoring of numerous active solar schemes

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				that deer are regularly noted within the fenced areas having exploited locations of undulating terrain and other opportunities for entry. Habitats of highest suitability for deer, such as woodland, will not be fenced and will continue to be accessible to these species.
CF-03	Hydrology, Flood Risk and Drainage	Management of Flood Water	"Drainage: This is already a contentious issue, no more so than in these flatlands of Lincolnshire, with ever more housing needing evermore drainage and an over stretched environment authority and infrastructure. Its reasonable to assume that once agriculture is taken out of play, so will the demand placed on the authority tasked with managing it."	<p>Paragraph 10.8.19 of <b>6.2.10 Environmental Statement - Chapter 10 Hydrology Flood Risk and Drainage [APP-048]</b> details maintaining the existing surface water run-off regime by utilising permeable surfacing for the site accesses, linear infiltration trenches around any proposed infrastructure (substations and batteries) and wildflower planting at the leeward edge of solar panels to ensure that the Scheme is unlikely to generate surface water runoff rates beyond the baseline scenario.</p> <p>Lincolnshire County Council have stated (pg. 3 <b>[RR-188]</b>) that <i>'The surface water drainage strategy is appropriate for the development and an appropriate worded requirement can be included within the DCO for the full details.'</i></p> <p>Requirement 11 'Surface and foul water drainage' in Schedule 2 to <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> secures the provision of a detailed surface water drainage scheme</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				following consent and before the Scheme is implemented.
CF-04	Hydrology, Flood Risk and Drainage  General	Lincoln Flood Scheme	"We are very concerned that the Lincoln Flood Scheme ( another Government decision forced upon this small family farm some years ago) will be used more and more going forward as Lincolnshire battles with climate change. When initiated, many acres of our land is deliberately flooded to protect the city of Lincoln, for which we receive NO compensation for loss of crops. Again, we have been given no assurances that any future losses will ever be considered or compensated for."	<p>The Applicant notes this comment. Whilst climate change may lead to the more regular use of the River Till Flood Storage Area, the Scheme itself will not contribute to this.</p> <p>Paragraph 10.8.19 of <b>6.2.10 Environmental Statement - Chapter 10 Hydrology Flood Risk and Drainage [APP-048]</b> details maintaining the existing surface water run-off regime by utilising permeable surfacing for the site accesses, linear infiltration trenches around any proposed infrastructure (substations and batteries) and wildflower planting at the leeward edge of solar panels to ensure that the Scheme is unlikely to generate surface water runoff rates beyond the baseline scenario.</p> <p>Requirement 11 'Surface and foul water drainage' in Schedule 2 to <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> secures the provision of a detailed surface water drainage scheme following consent and before the Scheme is implemented.</p>
CF-05	Principle of Development	On-site Lighting	"Lighting: Lincolnshire has some amazing night skies with very low light pollution. We are only 6 miles away from Lincoln but all our lives, we have been able to look up and see the stars. Miles of	Paragraph 4.5.61 of <b>6.2.4 Environmental Statement - Chapter 4 Scheme Description [APP-042]</b> states that " <i>Lighting is not required within the solar arrays. Lighting will be provided</i>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
	Landscape and Visual Impact		expensive industrialized high fencing will need security through lighting which will have an impact on our ability to enjoy the wonder of our night skies. To have this taken away (when better planning could have negated the need) will be devastating."	<p><i>within substations and within the Energy Storage site to be used only in the event of it being required for maintenance and security purposes. Down lighting would be used on lighting columns of a maximum height of 3m."</i></p> <p><b>6.2.8 ES Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> (the 'LVIA') takes account of lighting and sets out that during the operation of the Scheme (Table 8.49), mitigation will assist in mitigating any potential for light pollution and that "<i>New planting along the boundary of substations and energy storage areas to filter the presence in the landscape and provide softening and screening</i>".</p>
CF-06	Socio-economics, Tourism and Recreation  Landscape and Visual Impact	Impact on Holiday Business	"Income: We have diversified our business (at our own expense which entailed borrowing) into holiday cottage lets. People come to stay here because it is peaceful, they are surrounded by the sound of Birds by day and Owls by night, they can look up and see stars clearly and walk along our farm paths and take in the countryside scenery. The very things they come for will be taken away and so, over time, they will stop coming as no one would knowingly book a farm stay on the edges of industry. We fully expect our business will be lost and we have been offered no channel to deal with this loss should our worst fears prevail."	Impacts on businesses, including those within the accommodation sector, or tourism and recreation sector have been assessed across the Local Impact Area (Bassetlaw and West Lindsey districts) as a whole in Section 18.7 of <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b> . Individual cases of impacts on rural businesses nearby to the Scheme, unless they are identified as a directly impacted receptor in <b>6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> (the 'LVIA'), are therefore not assessed separately.

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				With regard to landscape and visual matters and links to tourism, the LVIA [APP-046] considers both the landscape and visual effects of the Scheme on the local environment and any recognised associations with the views across the landscape. Paragraph 8.5.65 of the LVIA recognises the importance of long-distance views to the more elevated wooded skylines to the east, long views to the north and south, which are constrained only by the effects of distance, riverside vegetation and hedgerows.
CF-07	Socio-economics, Tourism and Recreation  Other Environmental Matters (Human Health)	Wellbeing and Business Viability	"Wellbeing: We are not wealthy absentee Landowners. We are the small family farm left behind to continue to struggle to survive against all the odds. The odds have been placed before us largely due to Government decisions and this latest is another blow to hope. (Please note: it has also been decided this week that plans to develop the local airfield into a visitor attraction, which we hoped would greatly improve our prospects, have been cancelled by the Government due to other Government plans for it) so you see, little scope for hope for this small farm and these small communities."	The Applicant seeks to assure the Interested Party that the only identified significant adverse effect on human health and wellbeing as a result of the Scheme is anticipated to be a short- to medium-term temporary moderate adverse effect during construction (see Table 18.15 and para. 18.7.62 of <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b> ). No other significant adverse effects to human health and wellbeing have been identified in the Environmental Statement, as summarised in Section 21.5 of <b>6.2.21 Environmental Statement - Chapter 21 Other Environmental Matters [APP-059]</b> . Mitigation measures to ensure safety, human health and wellbeing are maintained throughout the Scheme's construction, operation,

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>and decommissioning are secured through the control documents secured by Requirements 13, 14 and 21 in Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p> <p>Impacts on the agricultural industry have been assessed in Section 18.7 of <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b> and the direct impacts on local agriculture in <b>6.2.18 Environmental Statement - Chapter 19 Soils and Agriculture [APP-057]</b>. Together, these assessments do not identify any significant adverse impacts to farm businesses neighbouring the Scheme with regard to economic performance or agricultural circumstances.</p> <p>The Applicant is also aware of the conflict regarding the proposed use of RAF Scampton: this being West Lindsey District Council's policy ambitions for a mixed use redevelopment of the site versus the current proposals by Government for use as accommodation for asylum seekers. Assessments of either proposal have not been included in the cumulative assessment of socio-economic effects due to the limited available information from Government at the point of the DCO Application being submitted (January 2023). Nonetheless, the Applicant is cognisant of the emerging information regarding the site and as</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				such will seek to ensure any cumulative impacts from this site are understood as the examination progresses.
CF-08	Other Environmental Matters (Human Health)  Landscape and Visual Impact	Mental Wellbeing	"A sense of helplessness has crept into our everyday lives as we witness the reality of so called consultation. After many generations of farming and being part of this idyllic rural community, we feel time is up for us. Our voices are unheard, our needs are diminished and our future in farming squeezed between lit fencing, the sound of batteries and silver horizons instead of green and the constant worry of floods. These proposals are very depressing and I am concerned about the impact on my husbands [REDACTED], as a farmer, he simply cannot envisage being fenced in for the rest of his life."	<p>The Applicant is confident that the methods used, level of consultation undertaken and information presented throughout the pre-application stage met the legislative requirements of the Planning Act 2008 and associated guidance, which makes clear the importance of consulting local communities and parish councils. This is set out in detail in the <b>5.1 Consultation Report [APP-022]</b>, which was submitted to the Planning Inspectorate and accepted for examination.</p> <p>For example, Table 1.1 of Chapter 1 <b>[APP-022]</b>, details how the West Burton 4 site and the associated cabling infrastructure was removed from the Scheme in its entirety by considering the extensive consultation feedback received alongside a range of factors as part of the design refinement process of the Scheme.</p> <p>Table 1.2 of Chapter 1 <b>[APP-022]</b>, details how the Applicant provided a six-week community consultation, the publication of materials for this and methods to provide feedback.</p> <p>Chapter 7 <b>[APP-022]</b> describes the Applicant's approach to statutory consultation, including consulting with relevant authorities on a draft Statement of Community Consultation. Table 7.1</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>sets out the comments received from local authorities on the Applicant's approach to consultation and how these were considered by the Applicant. Table 7.3 in Chapter 7 describes how the Applicant complied with commitments made in the Statement of Community Consultation when undertaking statutory consultation.</p> <p>Chapter 8 <b>[APP-022]</b> describes how the Applicant undertook a six-week statutory phase two consultation on the Scheme, to provide communities, stakeholders and landowners a sufficient period of time to provide feedback. A Consultation Summary Report for this phase of statutory consultation was published on the dedicated Scheme website, shared with elected representatives and stakeholders and issued to over 9,000 properties within the vicinity of the Scheme, to help consultees understand how their feedback was being considered. A copy of the Phase Two Consultation Summary Report is provided as <b>5.7 Appendix 5.7: Phase Two Community Consultation Materials [APP-029 to APP-031]</b>.</p> <p>Chapter 11 of <b>5.1 Consultation Report [APP-022]</b> describes the significant volume of responses received to Section 47 consultation (local community), including the issues raised and how these were considered by the Applicant. This</p>



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>is further evidenced by <b>5.12 Appendix 5.12: Consultation Report Appendix – Section 47 Applicant Response [APP-036]</b>.</p> <p>With regard to landscape and visual matters and links to health and well-being, <b>6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> (the 'LVIA') includes a full and detailed assessment that deals with both effects on the landscape itself and effects on the visual amenity of people, as well as interrelationships of these with other related topics in the ES. The LVIA process is iterative and as a result, the design of the Scheme changed to respond to the findings of the assessment to ensure that landscape mitigation is fully considered as part of the process.</p> <p>For example, the LVIA mitigation has had regard to the need to consider the landscape character and visual amenity for the users of Public Rights of Way ('PRoW'). This is set out in <b>6.3.8.3 Environmental Statement - Appendix 8.3 Assessment of Potential Visual Effects [APP-074]</b>. Public Rights of Way Receptor PR006 (Brox/198/1) on sheet [EN010132/APP/WB6.3.8.3] shows in this instance that the Embedded Mitigation would include panels set a minimum of 15m from the adjacent PRoW. Secondary Mitigation would also be implemented,</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>comprising of native hedgerows within and on the boundaries of the West Burton 1 Site being retained and reinforced with new native trees. Hedgerows would also be maintained at a taller height (c5m). The landscape proposals include for a new native woodland shelterbelt and scattered trees along the southern boundary of the WB1 Site. Once established, these measures, combined with the additional tree planting across the Site, would help break up the views of the Array, substation and associated infrastructure. During the spring and summer, when the vegetation is out in leaf, the hedgerows and trees would soften and filter views. Available views would be limited to transient views through gate entrances and over low hedgerows.</p>

**Table 2.5.2: Applicant's Response to Christine Warren [RR-046]**

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
CW-01	General (Consultation)	Accuracy of Information Conveyed In Person	Mrs Warren has now spoken to two different representatives on different occasions posting notices relating to the current stage of the DCO application on Gainsborough Road. Both representatives identified themselves to be from Dalcour Maclaren and both have told Mrs Warren that the private lane known as Sandhill Lane is to be used for HGV access for a period of 9 months for the construction of the Grid Connection for the West Burton Solar Project. We understand that on both occasions the representatives looked at plans before reiterating to Mrs Warren that access was definitely going via [REDACTED].	<p>The Applicant is aware that Dalcour Maclaren representatives have been in communication with Mrs Warren in person, phone calls and email exchanges. At no point during the pre-submission stage has Sandhill Lane been proposed to be used for construction access for the grid connection. This was reiterated to Mrs Warren during that communication.</p> <p>The proposed route for construction from Gainsborough Road is the existing quarry access which is the to the south of Sandhill Lane and then runs parallel to it as it goes northwards. This is shown in <b>2.3_B Works Plan Sheet 10 of 10 [EN010132/EX1/WB2.3_B]</b>.</p>
CW-02	Alternatives and Design Evolution  Site Description  Principle of Development	Location and Scope of Works	"This has obviously come as a surprise to Mrs Warren as during the consultation on the proposed West Burton Solar Project scheme; as although reference was made to underground electricity cables connecting West Burton 1 to 4 to the West Burton Substation and from there to the National Grid substation at West Burton Power Station. The scheme consultation had referred to a new West Burton 400kV Substation and energy storage facility being located to the northwest of West Burton Power Station. As such the consultation on the proposed scheme has not involved land to the south of the Power Station	Chapter 8 of <b>5.1 Consultation Report [APP-022]</b> describes how the Applicant undertook a six-week statutory phase two consultation on the Scheme, during which the Applicant presented consultees with environmental information sufficient for consultees to understand the potential likely significant effects of the Scheme in the PEIR. A non-technical summary was published to accompany the PEIR. The PEIR presented the areas for the solar panels and associated development, cable route search corridor and potential area for energy storage and associated development. The area to the northwest of West

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			becoming the siting of the Grid Connection as now proposed."	Burton Power Station was not shown as the main grid connection point, that was always proposed to be within the power station. The proposed Scheme substation within the vicinity of West Burton Power Station was removed from the Scheme design when the West Burton 4 site was removed from the Scheme. The land to the south of the power station was included within the cable route search corridor at PEIR stage. This is still shown within the Application as Works No 5A on Sheet 10 of <b>2.3_B Works Plan Revision B [EN010132/EX1/WB2.3_B]</b> , which is works to lay electrical cables, accesses and temporary laydown areas for the electrical cables as set out in <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> .
CW-03	General Site Description	Location of Residential Property	"The property St Ives is a residential property whose western and northern site boundaries abut the EDF owned Power Station site. The eastern boundary of St Ives abuts the West Burton Meadow Local Wildlife Site owned by the Nottinghamshire Wildlife Trust. The southern boundary of St Ives abuts Sandhill Lane."	The Applicant notes this comment.
CW-04	General (Consultation)	Accuracy of Information Conveyed In Person	"We have represented Mrs Warren for many years in relation to planning matters, she has asked us to look into this matter. It is therefore concerning that the information that has been given to Mrs Warren by representatives of the	The Applicant acknowledges this comment but is confident that the level of consultation undertaken, and information presented throughout the pre-application stage met the legislative requirements of the Planning Act 2008 and associated guidance. This has been

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>applicants is directly contradictory to the material that has been submitted for the DCO application."</p>	<p>evidenced in <b>5.1 Consultation Report [APP-022]</b>, which was submitted to the Planning Inspectorate and accepted for examination.</p> <p>For example, as described in Chapter 2 <b>[APP-022]</b>, the Applicant undertook two phases of community consultation to share information and invite feedback at different stages of Scheme development.</p> <p>Chapter 7 <b>[APP-022]</b> describes the Applicant's approach to statutory consultation, including consulting with relevant authorities on a draft Statement of Community Consultation. Table 7.1 sets out the comments received from local authorities on the Applicant's approach to consultation and how the Applicant has had regard to these in developing the Scheme. Table 7.3 in Chapter 7 describes how the Applicant complied with commitments made in the Statement of Community Consultation when undertaking statutory consultation.</p> <p>Chapter 8 <b>[APP-022]</b> describes how the Applicant undertook a six-week statutory phase two consultation on the Scheme, during which the Applicant presented consultees with environmental information sufficient for consultees to understand the potential likely significant effects of the Scheme in a Preliminary Environmental Impact Report (PEIR). A non-</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>technical summary was published to accompany the PEIR, with public information events and free-to-use communications channels open to help aid accessibility and understanding of the Scheme. A Consultation Summary Report for this phase of statutory consultation was published on the dedicated Scheme website, shared with elected representatives and stakeholders and issued to over 9,000 properties within the vicinity of the Scheme, to help consultees understand how their feedback was being considered. A copy of the Phase Two Consultation Summary Report is provided as <b>5.7 Appendix 5.7: Phase Two Community Consultation Materials [APP-029 to APP-031]</b>.</p> <p>Chapter 11 of <b>5.1 Consultation Report [APP-022]</b> describes the significant volume of responses received to Section 47 consultation (local community), including the issues raised and how the Applicant has had regard to these in developing the Scheme. This is further evidenced by <b>5.12 Appendix 5.12: Consultation Report Appendix - Section 47 Applicant Response [APP-036]</b>.</p> <p>The host authorities have confirmed that the statutory consultation process was adequate <b>[AoC-001 to AoC-014]</b>.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>Dalcour Maclaren have been making attempts to communicate with Ms Warren since 29<sup>th</sup> September 2021, when initial Landowner Questionnaires were issued. Subsequent follow up methods have included reminder letters, Land Interest Questionnaires, and site visits. Ms Warren was also in receipt of a Statutory Consultation Notice issued on the 14<sup>th</sup> June 2022.</p> <p>Dalcour Maclaren have received 3 phone calls from Ms Warren and an email in response to site notices erected to identify land interests of unregistered land, details of which were passed to the Engagement team .</p>
CW-05	General Alternatives and Design Evolution	Ease of Navigation through DCO Application Documents	<p>"The nature and format of the information submitted for the DCO application which encompasses 356 documents is impractical for the general public to circumnavigate and trying to locate information even for ourselves is not a straightforward task. It is noted that the submitted Design and Access Statement Part 1 (Document APP-314) on page 100 still includes the 'Substation and Energy Storage Area' plan (unreferenced) being to the north-west of the Power Station site. This adds to the confusion regarding the grid connection."</p>	<p>The Applicant is confident that the methods used, level of consultation undertaken and information presented throughout the pre-application stage met the legislative requirements of the Planning Act 2008 and associated guidance, which makes clear the importance of consulting local communities and parish councils. This is set out in detail in the <b>5.1 Consultation Report [APP-022]</b>, which was submitted to the Planning Inspectorate and accepted for examination.</p> <p>The page referenced in the Design and Access Statement <b>[APP-314]</b> is showing the PEIR layouts which did show the energy storage and a substation to the north west of the power station</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				which has been changed in the submission, Please refer to Section 5.5 which explains the layout which was submitted and <b>6.4.4.2 Environmental Statement Figure 4.3 Illustrative Site Layout West Burton 4 [APP-144]</b> . The Design and Access Statement sets out the narrative behind how the design evolved throughout the pre-submission stage.
CW-06	General (Consultation)	Private Consultation	"Mrs Warren is disappointed that nobody from the project has ever sought to visit her, given that her property is located immediately adjacent to the Power Station complex."	<p>The Applicant is confident that the methods used, level of consultation undertaken and information presented throughout the pre-application stage met the legislative requirements of the Planning Act 2008 and associated guidance, which makes clear the importance of consulting local communities and parish councils. This is set out in detail in the <b>5.1 Consultation Report [APP-022]</b>, which was submitted to the Planning Inspectorate and accepted for examination.</p> <p>Voluntary consultation with individual property owners was undertaken throughout the duration of the Scheme development and the preparation of the ES including discussion over bespoke mitigation relevant to individual properties.</p> <p>Dalcour Maclaren have made the following attempts to communicate with Ms Warren regarding the project to date:</p>



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response	
				24/09/21	Landowner Questionnaire (LOQ) issued
				19/10/21	LOQ reminder letter 1 issued
				08/11/21	LOQ reminder letter 2 issued
				23/11/21	Site visit to follow up LOQ
				07/12/21	2 <sup>nd</sup> Site visit to follow up LOQ
				17/03/22	Land Interest Questionnaire (LIQ) issued
				20/03/22	LIQ for further land issued
				07/04/22	LIQ reminder letter issued
				10/06/22	Phone call incoming
				14/06/22	S.48 Notice issued
				24/07/22	Statutory Consultation letter issued
				01/03/23	Phone call incoming
				17/03/23	Phone call incoming
				30/05/23	Email incoming
				30/05/23	Discussion while notice monitoring

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
CW-07	Landscape and Visual Impact	Identification of Property in ES	<p>"Mrs Warren has noted that photographs have been taken of her property, which she assumes may be connected with the DCO application. The property St Ives is not indicated to be a 'Singular building' on Figure 8.8.4 West Burton 3 to West Burton Power Station - Residential Receptors. As such it must be assumed that no assessment of the impact of the proposal on this property has been made at all in the Environmental Statement. It calls into question whether the applicants are actually aware of the presence of St Ives as a residential property that lies less than 20m from the DCO Limits boundary."</p>	<p>The Applicant was in contact with Mrs Warren at the time she reported that somebody was taking photographs of her property. The Applicant checked with all of their consultant team and it was confirmed to her that the person taking photographs was not related to the Scheme.</p> <p><b>6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> (the 'LVIA') takes into account the effects on residential receptors and this includes singular buildings, groups of buildings and towns or villages. Table 8.16 of the LVIA sets out the selection of initial residential receptors for the purpose of the assessment, the reason for their selection being that the receptors are all within the 1km Study Area for the Scheme and the 0.5km Study Area from the outer boundary of the Cable Route Corridor. This property is taken into account as part of Residential Receptor R094 Sturton le Steeple. Please refer to individual receptor assessment sheets at <b>6.3.8.3 Environmental Statement - Assessment of Potential Visual Effects [APP-074]</b>. Paragraph 8.3.10 of the LVIA notes the [Secretary of State's] need to <i>"judge whether the visual effects on sensitive receptors, such as local residents, and other receptors, such as visitors to the local area, outweigh the benefits of the project"</i>. The LVIA also sets out details of the offsets that are proposed</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>around sensitive receptors such as settlement edges, individual residential properties, PRoW and transport routes (see section 8.11) which aim to assist in the integration and dispersion of the Scheme across the landscape.</p> <p>In respect of noise, the nearest noise activities are associated with construction, and the transport assessment indicates that up to two to three vehicle movements per hour are anticipated. Noise effects related to these activities are considered to be negligible at the St.Ives property. This is set out in "Assessment of Construction Traffic Noise Cable Route Corridor" Section 15.7 of <b>6.2.15 Environmental Statement - Chapter 15 Noise and Vibration [APP-053]</b>.</p> <p>The property is close to the cable route access 101, the location of which is set out and assessed in Section 14.7 of <b>6.2.14 Environmental Statement - Chapter 14 Transport and Access [APP-052]</b> and in the associated <b>6.3.14.1_A Environmental Statement - Appendix 14.1 Transport Assessment Revision A [EN010132/EX1/WB6.3.14.1_A]</b>, pages 24 to 27 and pages 32 and 33. The access would be used for around 90 days during the construction phase with an estimated 4 HGV's , 4 LGV's and 10 cars arriving per day.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>Whilst there may not be specific receptors at the St Ives property , it has been incorporated into the construction dust assessments in accordance with the relevant guidance. The mitigation measures outlined within the assessments are sufficient to reduce the potential impacts during the construction phase to a negligible impact as outlined in <b>6.3.17.1 – 6.3.17.3 Environmental Statement - Appendices 17.1 to 17.3 QDA and CDMP [APP-133 to APP-135]</b>. The vehicle movements associated with the Scheme within the vicinity of the St. Ives property are significantly below the relevant thresholds for detailed modelling assessment, and are considered to not have any significant effects, as outlined in paragraph 17.4.6 of <b>6.2.17 Environmental Statement - Chapter 17 Air Quality [APP-055]</b>. An Outline Construction Traffic Management Plan (CTMP) has been prepared to support the application at <b>6.3.14.2_A Environmental Statement - Appendix 14.2 Construction Traffic Management Plan Revision A [EN010132/EX1/WB6.3.14.2_A]</b>. The measures set out in the CTMP are secured through Requirement 15 in Schedule 2 of the <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
CW-08	Site Description Air Quality Transport and Access Noise and Vibration	Use of Quarry Track to Access Works	"It is understood from the DCO Limits Plan that in fact Sandhill Lane is not included within the DCO application and instead construction access will be taken from the access track that was constructed in parallel to the south of Sandhill Lane for the quarry that has not yet been commenced (referred to as Access 101 on submitted plans). However, HGV movements on that access track would adversely affect the living conditions of the occupiers of St Ives through noise, disturbance and dust."	<p>The anticipated worst-case (combined West Burton Sites 1, 2 and 3 and Battery Energy Storage System (BESS)) peak day vehicle movements associated with the Scheme during the construction phase are forecast to be 46 HGV movements, and 326 car and LGV movements, which are therefore below the relevant thresholds for detailed modelling assessment, and are considered to not have any significant effect. Additionally, mitigation measures for the construction and decommissioning phases are outlined within the Dust Management Plans <b>6.3.17.1 – 6.3.17.3 Environmental Statement - Appendices 17.1 to 17.3 QDA and CDMP [APP-133 to APP-135]</b>. These mitigation measures will reduce and minimise the potential for adverse effects associated with fugitive dust emissions.</p> <p>An Outline Construction Traffic Management Plan (CTMP) has been prepared to support the application within <b>6.3.14.2_A Environmental Statement - Appendix 14.2 Construction Traffic Management Plan Revision A [EN010132/EX1/WB6.3.14.2_A]</b> which is secured through Requirement 15 in Schedule 2 of the <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p> <p>The outline CTMP submitted as part of the DCO application provides a framework for the management of construction vehicle movements</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>to and from the Scheme, to ensure that the effects of the temporary construction phase on the local highway network are minimised and made acceptable.</p> <p>The construction vehicle movements associated with the installation of cables are set out in paragraph 9.14 of the Outline CTMP. This states, <i>"Each access along the Cable Route Corridor will only generate traffic flows for 90 days. Each access is only forecast to generate eight arrivals and eight departures per day for the delivery of material and equipment (half by 10m tipper, half by LGV), and around 10 construction workers arriving by car and shuttle bus. These movements will again be spread throughout the day, and will avoid the network peak hours"</i>.</p> <p>A handful of larger vehicle movements associated with the cable drum are expected, although this will not be a daily movement.</p>
CW-09	Transport and Access  Principle of Development (DCO)	Information on Use of Access	<p>"It is unclear from the submitted information as to how long this construction access route would be used. It appears that this access would be used for Works Package 4 (National Grid Connection), Works Package 5 (Grid Connection Cable Route) and Works Package 5A(vii) as shown on Application Doc No. WB2.3. It is slightly unclear what Works Package 5A(vii) actually involves."</p>	<p>The final design of the works which will take place within West Burton Power Station are dependent on agreement with National Grid at the time of construction. The works associated with Work No. 4 are works to the National Grid substation and within their operational boundary.</p> <p>Work No. 5 relates to works in connection with electrical cabling. Detailed design work relating to this works package will be secured through a</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>number of the management plans including Requirement 13 for the Construction Environmental Management Plan and Requirement 15 for the Construction Traffic Management Plan as contained in <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p> <p>The construction vehicle movements associated with the installation of cables are set out in paragraph 9.14 of the Outline CTMP. This states, <i>"Each access along the Cable Route Corridor will only generate traffic flows for 90 days. Each access is only forecast to generate eight arrivals and eight departures per day for the delivery of material and equipment (half by 10m tipper, half by LGV), and around 10 construction workers arriving by car and shuttle bus. These movements will again be spread throughout the day, and will avoid the network peak hours"</i>.</p> <p>A handful of larger vehicle movements associated with the cable drum are expected, although this will not be a daily movement.</p> <p>For clarity, Work No. 5A(vii) refers solely to temporary construction laydown areas in connection with electrical cabling. The area to the south of West Burton Power Station was erroneously shown as Work No. 5A(vii) only, and as such has been updated to be designated for</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>Work No. 5A, so that all works to lay electrical cables, accesses, and temporary construction laydown areas for the electrical cables (as described in Schedule 1 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>) can take place in this location. This has been amended and presented in <b>22.3_B Works Plan Revision B [EN010132/EX1/WB2.3_B]</b>.</p>
CW-10	Principle of Development	Engineering Drawings	<p>"In Appendix 4.1 (Engineering Drawings) we can find no drawings which details any of the actual works involved at the West Burton Power Station end of the proposal."</p>	<p>The final design of the works which will take place within West Burton Power Station is dependent on agreement with National Grid at the time of construction. The works associated with Work No. 4 are works to the National Grid substation and within their operational boundary.</p> <p>Work No. 5 relates to works in connection with electrical cabling. Information pertaining to cable construction works is set out in paragraphs 4.5.40 – 4.5.56 of <b>6.2.4 Environmental Statement - Chapter 4 Scheme Description [APP-042]</b>. Detailed design work relating to this works package will be secured through a number of the management plans including Requirement 13 for the Construction Environmental Management Plan and Requirement 15 for the Construction Traffic Management Plan as contained in <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p>



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
CW-11	Principle of Development	Scope of Works at Grid Connection Point	<p>"In Section 4 of the ES (Scheme Description) paragraph 4.5.39 indicates that the: "Works at the existing National Grid West Burton 400kV substation Site to facilitate connection to the Scheme will include extending an existing busbar and associated gas zones to allow for the connection of a new generator bay with a 400kV circuit breaker, current transformers, metering current transformer/voltage transformer (CT/VT) units and line disconnecter for the 400kV connection to the West Burton 3 Solar Site. Provision of a stand-alone building to house duplicate feeder protection systems, commercial metering systems, National Grid owned protection and control equipment and User Remote Control and data acquisition apparatus." Despite our best efforts to look we can find not drawings that details these works within Works Packages 4 and 5 within the Power Station site further."</p>	<p>The final design of the works which will take place within West Burton Power Station are dependent on agreement with National Grid at the time of construction. As such, no detailed design drawings are able to be presented for Work No. 4.</p> <p>As set out at response CW-10 above, Work No. 5 relates to works in connection with electrical cabling. Information pertaining to cable construction works are set out in paragraphs 4.5.40 – 4.5.56 of <b>6.2.4 Environmental Statement - Chapter 4 Scheme Description [APP-042]</b>. Detailed design work relating to this works package will be secured through a number of the management plans including Requirement 13 for the Construction Environmental Management Plan and Requirement 15 for the Construction Traffic Management Plan as contained in <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p>
CW-12	Principle of Development	Scope of Works at Grid Connection Point	<p>"The Grid Connection Statement in section 3.8 describes the West Burton National Grid Substation Works as: "Works will be required within the existing 400kV GIS extension building attached to the southwest of the main indoor West Burton Air Insulated Switchgear (AIS) substation, to create a new generation bay enabling the Scheme to connect to the grid. The</p>	<p>The final design of the works which will take place within West Burton Power Station are dependant on agreement with National Grid at the time of construction. The works associated with Work No. 4 are works to the National Grid substation and within their operational boundary.</p> <p>Works at the existing National Grid West Burton 400kV substation Site to facilitate connection to</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>works required are anticipated to consist of the provision of:</p> <ul style="list-style-type: none"> <li>• Extending Main Busbar 4 and reserve busbar ¾ gas zones to allow for the connection of a new Island Green Power GIS substation bay comprising the below;</li> <li>• A 400kV 3phase 4000A circuit breaker for control and protection of the outgoing circuit serving the new scheme;</li> <li>• A 3phase set of current transformers for protection of the new outgoing 400kV feeder circuit and the overlap with the National Grid system;</li> <li>• A 3phase High Accuracy Metering Current and Voltage Transformer assembly for commercial metering of the connection;</li> <li>• A 3phase 400kV Line disconnector/earth switch for isolation and earthing of the outgoing 400KV feeder circuit;</li> <li>• A 3phase set of 400kV high voltage cable sealing ends and cables connecting the National Grid site with the Scheme's site at West Burton 3; and</li> <li>• A 3phase Power Quality ready Capacitor Voltage transformer.</li> </ul>	<p>the Scheme will include extending an existing busbar and associated gas zones to allow for the connection of a new generator bay with a 400kV circuit breaker, current transformers, metering current transformer/voltage transformer (CT/VT) units and line disconnector for the 400kV connection to the West Burton 3 Solar Site. Provision of a stand-alone building to house duplicate feeder protection systems, commercial metering systems, National Grid owned protection and control equipment and User Remote Control and data acquisition apparatus. This is set out in <b>6.2.4 Environmental Statement Chapter 4 Scheme Description [APP-042]</b>. These works will be similar to the existing apparatus that are currently located in the Power Station.</p> <p>Work No. 5 relates to works in connection with electrical cabling and the detailed design work relating to this works package will be secured through a number of the management plans including Requirement 13 for the Construction Environmental Management Plan and Requirement 15 for the Construction Traffic Management Plan as contained in <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			Also required is protection, control and ancillary apparatus for the circuit to be housed within a stand-alone building sized approximately 6m x 3 m, comprising duplicate feeder protection systems, commercial metering systems, National Grid owned protection and control equipment and User Remote Control and data acquisition apparatus." Unfortunately, the Grid Connection Statement does not include any drawings of these works in order to allow their impact on the property St Ives to be assessed."	
CW-13	Principle of Development	Scope of Works at Grid Connection Point	"In Section 4 of the ES (Scheme Description) paragraph 4.5.40 indicates that the Works Package 5A involves: "A 400kV cable circuit (consisting of up to 3 No. cables) cables will export the power generated by the Scheme and power stored at the BESS from the substation at West Burton 3, to the National Grid substation at West Burton Power Station. The length of this cable is approximately 9.93 km.""	The Applicant notes this comment.
CW-14	Principle of Development	Scope of Works at Grid Connection Point	"No specific indication of what works are precisely involved in the area marked as Works Package 5A(vii). It is assumed that as part of the cable route phase, all works will be underground with no above ground structures, however, from the information available we cannot be certain of this."	The area to the south of West Burton Power Station was erroneously shown as Work No. 5A (vii) only, and as such has been updated to be designated for Work No. 5A, so that all works to lay electrical cables, accesses, and temporary construction laydown areas for the electrical cables (as described in Schedule 1 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> ) can take place in this

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				location. This has been amended and presented in <b>2.3_B Works Plan Revision B [EN010132/EX1/WB2.3_B]</b> . As such, this will include below ground works and some surface structures and works (in temporary construction laydowns areas) as set out in paragraphs 4.5.40 – 4.5.56 of <b>6.2.4 Environmental Statement - Chapter 4 Scheme Description [APP-042]</b> .
CW-15	Principle of Development Transport and Access	Length and Intensity of Access Use	“There is contradictory information about the length of time the construction access routes will be used. The timetable given for the grid connection is specified as being an overall 21 months. Paragraph 6.13.15 of the Planning Statement states: “In relation to the construction of the cable within the Cable Route Corridor, it is anticipated that this will be built out in phases and each of the 19 accesses for the Cable Corridor Route will be used for approximately 90 days during the construction phase. It is likely that four or five accesses will be in use concurrently. It is forecast that each access will generate up to eight arrivals and eight departures per day for the delivery of material and equipment. Around half of these will be HGV trips and half LGV trips. There will also be around 10 construction workers per access, arriving by car and shuttle bus.” However, the Planning Statement does not give any details of the	<p>The proposed construction access arrangements are set out in <b>6.3.14.1_A Environmental Statement - Appendix 14.1 Transport Assessment Revision A [EN010132/EX1/WB6.3.14.1_A]</b>.</p> <p>The construction vehicle movements associated with the installation of cables are set out in paragraph 9.14 of the Outline <b>6.3.14.2_A Environmental Statement - Appendix 14.2 Construction Traffic Management Plan Revision A [EN010132/EX1/WB6.3.14.2_A]</b> which is secured by Requirement 13 in Schedule 2 of the <b>dDCO [EN010132/EX1/WB3.1_A]</b>. This states, “Each access along the Cable Route Corridor will only generate traffic flows for 90 days. Each access is only forecast to generate eight arrivals and eight departures per day for the delivery of material and equipment (half by 10m tipper, half by LGV), and around 10 construction workers arriving by car and</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>construction access impacts associated with the Grid Connection in Works Package 4."</p>	<p><i>shuttle bus. These movements will again be spread throughout the day, and will avoid the network peak hours".</i> At this stage the same assumptions are assumed for Works Package 4.</p> <p>A handful of larger vehicle movements associated with the cable drum are expected, although this will not be a daily movement. As a worst-case considering all movements to be HGVs the resulting noise impact at the St. Ives property will be insignificant.</p> <p>Assessment of the cable corridors has been included within <b>6.3.17.1 – 6.3.17.3 Environmental Statement - Appendices 17.1 to 17.3 QDA and CDMP [APP-133 to APP-135]</b>. Whilst there may not be specific receptors at the construction accesses , they have been incorporated into the assessments in accordance with the relevant guidance. The mitigation measures outlined within the assessments are sufficient to reduce the potential impacts during the construction phase to negligible.</p> <p>The vehicle movements associated with the cable corridors are significantly below the relevant thresholds for detailed modelling assessment, and are considered to not have any significant effects, as outlined in paragraph 17.4.6 of <b>6.2.17 Environmental Statement - Chapter 17 Air Quality [APP-055]</b>. Additionally, mitigation</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>measures for the construction and decommissioning phases are outlined within the Construction Dust Management Plans [APP-133 to APP-135] as part of the DCO application. These mitigation measures will reduce and minimise the potential for adverse effects associated with fugitive dust emissions. Dust Management Plans are further secured through <b>7.1_A Outline Construction Environmental Management Plan Revision A [EN010132/EX1/WB7.1_A]</b> which is secured through Requirement 13 of the <b>dDCO [EN010132/EX1/WB3.1_A]</b>.</p>
CW-16	Principle of Development Transport and Access	Length and Intensity of Access Use	<p>"We do of course note that the representatives from Dalcour Maclaren posting the notices spoken to by Mrs Warren have said access 101 will be used for a 9-month period. The Transport Statement details different vehicle movements for the: "Cable Route Corridor • HGV – 16 (32 total movements) • LGV – 16 (32 total movements) • Car/Shuttle associated with construction workers – 40 (80 total movements)" There is no information in the Transport Statement that seems to deal with the construction access impacts associated with the Grid Connection in Works Package 4. This is an important omission."</p>	<p>The construction vehicle movements associated with the installation of cables are set out in paragraph 9.14 of the Outline <b>6.3.14.2_A Environmental Statement - Appendix 14.2 Construction Traffic Management Plan Revision A [EN010132/EX1/WB6.3.14.2_A]</b> which is secured by Requirement 13 in Schedule 2 of the <b>dDCO [EN010132/EX1/WB3.1_A]</b>. This states, <i>"Each access along the Cable Route Corridor will only generate traffic flows for 90 days. Each access is only forecast to generate eight arrivals and eight departures per day for the delivery of material and equipment (half by 10m tipper, half by LGV), and around 10 construction workers arriving by car and shuttle bus. These movements will again be spread throughout the day, and will avoid the network peak hours"</i>.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				A handful of larger vehicle movements associated with the cable drum are expected, although this will not be a daily movement.
CW-17	Principle of Development Site Description Transport and Access	Choice of Access	<p>"There is also no explanation or consideration as to why the reasonable alternative of utilising the access Power Station access gate and 'South Road' within the Power station site cannot actually be used to access both Works Package 4 and Works Package 5A(vii) instead of access 101. To get from the temporary access route into the Power Station site will already necessitate removal of part of the hedgerow boundary to the Power Station site to get to Works Package 4. This would be no different to the situation if access was instead taken through the Power Station access gate and 'South Road' with part of the hedgerow boundary then removed to get to the area of Works Package 5A(vii). This alternative option would remove vehicle movements from being immediately adjacent to St Ives and the Local Wildlife Site and instead use the existing Power Station road network that was specifically created to facilitate two-way HGV vehicle movements."</p>	

Table 2.5.3: Applicant's Response to E C Morgan [RR-076]

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
ECM-01	Site Description General (Consultation)	Consultation Regarding Use of Land for Cable Route	Part of the cable route seems to cross the south west corner of my land and I have not had any communication or the chance to discuss. With a large field to the south and west why is this required. I have no objection to the whole project.	<p>The Applicant can confirm that the cable corridor does not cross the respondent's land but abuts the south west corner of it as shown on Sheet 8 of <b>2.2_A Land Plans Revision A [AS-006]</b>.</p> <p>The Applicant has previously issued the Interested Party with notices and correspondence required under Section 42 and Section 56 of the Planning Act 2008, as this Interested Party is a landowner with land interests that are adjacent to the Scheme's Order Limits.</p>



**Table 2.5.4: Applicant's Response to Emma Hill [RR-087]**

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
EH-01	Planning History Principle of Development Socio-economics, Tourism and Recreation General (Consultation)	Planning Permission Impacted by Cable Route	<p>"my husband and i own a field on the grid connection corridor to the proposed solar panels , we have obtained planning permission to build 2 agricultural buildings and yard on our field to create an agricultural business the cable positions could have a devastating impact to our business and future development of it This is causing me and my family untold stress and holding our business back due to all the uncertainties , we feel we are being bullied and pressured , please read all the documents relating to this planning application west lindsey 145882.""</p>	<p>The Applicant acknowledges this comment but is confident that the level of consultation and engagement undertaken and information presented throughout the pre-application stage met the legislative requirements of the Planning Act 2008 and associated guidance. This has been evidenced in <b>5.1 Consultation Report [APP-022]</b>, which was submitted to the Planning Inspectorate and accepted for examination.</p> <p>The Applicant notes that the business referred to has recently been granted planning permission for the erection of 2 agricultural barns. This permission was granted on 18<sup>th</sup> January 2023 The Applicant has undertaken technical modelling work to confirm that the cables for the Scheme and the other NSIP projects would all fit within the order limits without impacting upon the barns, and intends to discuss this in detail with the landowner.</p> <p>The Environmental Statement has sought to identify adverse effects to the surrounding area where it can be reasonably assessed. Impacts on the agricultural industry are assessed in Section 18.7 of <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b> and the direct impacts on</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				local agriculture in <b>6.2.19 Environmental Statement - Chapter 19 Soils and Agriculture [APP-057]</b> . Together, these assessments do not identify any significant adverse impacts to farm businesses neighbouring the Scheme with regard to economic performance or agricultural circumstances.
EH-02	Transport and Access	Construction Traffic Impacts	"my other concerns are the amount of new traffic that we will see on an already busy road when they are putting the cables in and the solar panels up"	<p>An Outline Construction Traffic Management Plan (CTMP) has been prepared to support the application within <b>6.3.14.2_A Environmental Statement - Appendix 14.2 Construction Traffic Management Plan Revision A [EN010132/EX1/WB6.3.14.2_A]</b> which is secured through Requirement 15 in Schedule 2 of the <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p> <p>The outline CTMP submitted as part of the DCO application provides a framework for the management of construction vehicle movements to and from the Scheme, to ensure that the effects of the temporary construction phase on the local highway network are minimised and made acceptable.</p> <p>The Transport Assessment within <b>6.3.14.1_A Environmental Statement - Appendix 14.1 Transport Assessment Revision A [EN010132/EX1/WB6.3.14.1_A]</b> provides an assessment of the transport effects of the</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				Scheme and concludes, through paragraphs 11.1 to 11.11, that the Scheme is acceptable from a transport perspective.
EH-03	Ecology and Biodiversity	Impact on Hedgerows	"other concerns are ... the ancient hedgerows that will be in jeopardy"	In certain locations where existing accesses do not exist, some very minor hedgerow removal is necessary to accommodate access roads between fields, land parcels and solar panel areas. Hedgerow removal is to be permanent in limited circumstances where required to retain access to the solar sites, but all hedgerow removal will only be temporary for the installation of the electrical cabling. The extent of hedgerow removal is set out in <b>Hedgerow Removal Plans</b> which are contained within <b>7.3_A Outline Landscape and Ecological Management Plan Revision A [EN010132/EX1/WB7.3_A]</b> . This removal will involve only very short sections of hedgerow to accommodate internal access roads and will not involve loss of trees, in particular trees protected under any Tree Preservation Orders (TPOs).
EH-04	Hydrology, Flood Risk and Drainage	Impact on Major Flood Defences	"other concerns are ... the flood defences for the villages because they will be going through a major flood bank and under the river"	The development of the proposed Scheme layout included consideration of statutory easements from watercourses. This is stated in Paragraph 10.7.1 of <b>6.2.10 Environmental Statement – Chapter 10 Hydrology Flood Risk and Drainage [APP-048]</b> , which details the embedded mitigation including the required easements.

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				Trenchless construction techniques will be utilised where the required cable connection crosses watercourses. Therefore, the flood defences will not be impacted by the proposed cable crossing points. The impacts of using this technique have been assessed in the <b>6.2.9 Environmental Statement in Chapter 9 Ecology and Biodiversity [APP-047]</b> in Section 9.7 and <b>6.2.10 Chapter 10 Hydrology, Flood Risk and Drainage [APP-048]</b> .
EH-05	Landscape and Visual Impact	Visual Impacts from the Scheme	"other concerns are ... the batteries and the solar panels will be an eyesore and all the fencing that will be surrounding them"	With regard to landscape and visual matters, <b>6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> has taken account of the requirement for fencing around the Sites to ensure the best possible fit with their landscape setting. The photography and photomontage information at <b>6.4.8.13.1 – 6.4.8.13.72 Environmental Statement Figures 8.14.1 to Figure 8.14.72 [APP-194 to APP-265]</b> shows how the proposed landscape mitigation will play a key role in making sure the battery storage, fencing and panels are comfortably accommodated within the existing landscape to minimise significant effects. For example, <b>6.4.8.13.24 Environmental Statement - Figure 8.13.24 Viewpoint 24 Photography and Photomontage [APP-217]</b> shows the fencing and panels set back from the existing hedgerows to allow for their proposed thickening and growth.

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				The photomontage also shows how the planting mitigation has been designed with new native tree and shrub planting, improvements to existing hedgerows and new hedgerows.
EH-06	General (Supply Chain) Climate Chain	Environmental Impact of Importing Infrastructure	"other concerns are ... if they are imported from another country that would be an environmental disaster shipping them over here ."	<p>Paragraph 5.4.7 of <b>7.10 Outline Skills Supply Chain and Employment Plan [APP-319]</b> states that <i>"Any procurement of supplies internationally will comply with both national and international law, and all policy and safety measures will be adhered to in the transportation of supplies."</i></p> <p>The environmental impact of international and intercontinental shipping of materials has been assessed in paragraph 7.8.28 of <b>6.2.7_A Environmental Statement - Chapter 7 Climate Change_ Revision A [EN010132/EX1/WB6.2.7_A]</b>. As such, this has already been considered in calculating the environmental cost (in terms of greenhouse gas emissions) of construction of the Scheme.</p>

Table 2.5.5: Applicant's Response to Jill Cowley [RR-147]

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
JC-01	General	Registration of Interest	"I live next to the proposed site and am concerned to have my views heard during the consultation period."	The Applicant acknowledges this comment and is confident that the level of consultation and engagement undertaken and information presented throughout the pre-application stage met the legislative requirements of the Planning Act 2008 and associated guidance. This has been evidenced in <b>5.1 Consultation Report [APP-022]</b> , which was submitted to the Planning Inspectorate and accepted for examination.

**Table 2.5.6: Applicant's Response to Kate Skelton [RR-172]**

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
KS-01	Principle of Development Energy Need	Cumulative Development	"The West Burton Solar Project is one of four NSIP proposals in a small area of West Lindsey, covering 10,000 acres of farmland. With Lincolnshire already earmarked for around 20,000 acres of solar development including 8 NSIPs, and having a solar NSIP already at "Little Crow" in Scunthorpe. This is a disproportionate amount of giant solar power plants in one district and indeed one county."	<p>Paragraph 12.1.3 of <b>7.11 Statement of Need [APP-320]</b> concludes that "Large-scale solar generation is essential to support the urgent decarbonisation of the GB electricity sector" and paragraph 4.4.11 describes that the location of the Scheme presents a "highly suitable solution for the efficient delivery of solar at scale over timeframe which will provide significant decarbonisation benefits". It concludes that this Scheme and others located near it will all be essential for the decarbonisation of the UK electricity sector.</p> <p>Paragraph 8.5.10 and Section 8.5 more generally of <b>7.11 Statement of Need [APP-320]</b> describe and express agreement with the Government's view that decentralised and community energy systems are unlikely to lead to the significant replacement of large-scale infrastructure. The Applicant therefore supports Government's view that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p> <p>Paragraphs 3.3.17 and 3.3.18 of <b>7.11 Statement of Need [APP-320]</b> explain the Government's view that irradiance, site topography and proximity to suitable connection points to the transmission network are likely to be key inputs</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>into site selection. Section 7.5 of <b>7.11 Statement of Need [APP-320]</b> describes the site selection process for large-scale solar more fully, and Section 7.7 of <b>7.11 Statement of Need [APP-320]</b> sets out how the design of the Scheme seeks to maximise utilisation of the grid connection capacity available at West Burton Substation.</p> <p>Chapter 9 of the <b>7.11 Statement of Need [APP-320]</b> describes the suitability of the proposed location for the Scheme and its proximity to a point of connection to the National Grid, which enables it to contribute to the urgent need for increased energy security and a low-carbon electricity supply. The Applicant has secured an agreement to connect to the grid at West Burton substation as demonstrated in <b>7.7 Grid Connection Statement [APP-316]</b>.</p>
KS-02	<p>Alternatives and Design Evolution</p> <p>Soils and Agriculture</p> <p>Energy Need</p>	Agricultural Land Use	<p>"Solar should not be given such preference over all this farmland, it is so land hungry and its generating profile so poor at just 10% of its rated capacity that roof tops are the only sensible option for these installations. The farmland taken up by these proposals would be far better used continuing to grow the nations crops than the limited amount of electricity generation that would be yielded by these solar projects. This is "robbing Peter to pay Paul". Nuclear and Wind are far less land hungry low</p>	<p>The selection of the Scheme's location has followed a systematic step-by-step process as set out in detail within <b>6.3.5.1 ES Appendix 5.1 Site Selection Assessment [AS-004]</b>. This took a sequential approach to the consideration of potential sites in terms of agricultural land classification. As a result, the Scheme maximises the utilisation of low grade, non-best and most versatile (BMV) agricultural land with 73.76% of the land being classified as non BMV land.</p>



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>carbon alternatives with more impressive generating statistics."</p>	<p>Paragraphs 2.1.23 to 2.1.31 of <b>6.3.5.1 ES Appendix 5.1 Site Selection Assessment [AS-004]</b> detail the consideration of brownfield land and roof tops and sets out why these were discounted as unsuitable. The methodology used for the site selection process is considered reasonable and proportionate and complies with the requirements of NPS EN-1 4.4.3.</p> <p><b>Chapter 4 of 7.11 Statement of Need [APP-320]</b> sets out the UK's legal requirement to decarbonise and explains how that requirement has created an increased need and urgency to meet the UK's obligations under the Paris Agreement (2015) as detailed within paragraph 4.2.7.</p> <p>The Chapter summarises the latest expert views on the urgency for, and amount of, low-carbon infrastructure needed to deliver the UK's Net Zero legal obligations and demonstrates that there is an urgent need for the development of large-scale solar schemes. Large-scale solar is especially relevant given the closure by 2028 of all but 1.2GW of existing nuclear power stations, and the closure by September 2024 of the last of the UK's operating coal fired power stations. The current and future UK electricity generation mix, and risks associated with technology</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				developments, are analysed in Chapter 5 of <b>7.11 Statement of Need [APP-320]</b> .
KS-03	Alternatives and Design Evolution Energy Need	Alternative energy technologies/sources	"We should also safeguard our scarce Grid connections from such inadequate proposals and save them for the more reliable and effective power generators. Hundreds of thousands of acres of farmland and countryside is now at threat due to the UK solar industry's flagrant drive to put the vast majority of the proposed 70GW of solar on farmland. This will be shortsighted folly and the root cause of other issues in a few years time."	<p>Section 3.3 of document <b>7.11 Statement of Need [APP-320]</b>, specifically paragraphs 3.3.2, 3.3.5 and 3.3.11, describes the Government's view that large capacities of low-carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar". This support for large scale solar as part of the 'answer' to net zero and energy security has been repeated in its recent policy documents published in March 2023.</p> <p>Solar is now a leading low-cost generation technology and Figure 10.3 of <b>7.11 Statement of Need [APP-320]</b> shows that on a levelised cost of energy basis (the estimated cost per unit of energy across the productive lifetime of an electricity generating station), large scale solar is already cheaper than offshore wind, and the Government's projections are that it will remain cheaper in the future. In 2021, Great Britain sourced 42% of its electricity from renewables, of which approximately 9.4% was from solar.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>Section 8.8 of <b>7.11 Statement of Need [APP-320]</b> describes the energy security benefits of solar generation when it is deployed alongside a portfolio of wind.</p> <p>Alternative low carbon technologies to utilise the West Burton Power Station point of connection were considered but were not considered suitable in the Order limits as set out in paragraphs 5.6.1-5.6.5 in <b>6.2.5 Environmental Statement- Chapter 5 Alternatives and Design Evolution [APP-043]</b>.</p> <p>The selection of the Scheme's location has followed a systematic step-by-step process as set out in detail within <b>6.3.5.1 ES Appendix 5.1 Site Selection Assessment [AS-004]</b>. This took a sequential approach to the consideration of potential sites in terms of agricultural land classification. As a result, the Scheme maximises the utilisation of low grade, non-best and most versatile (BMV) agricultural land with 73.76% of the land being classified as non BMV land.</p>
KS-04	Soils and Agriculture Energy Need	Loss of farmland	"Land competition is too great in the UK. We must not be railroaded down this ruinous path! We must protect the "Bread basket of England" This is madness! Let us do the right thing?"	The Applicant does not consider that the Scheme would result in adverse food security impacts either alone or cumulatively. The UK annual balance of domestically produced food is

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>sensitive to non-planning factors including weather and markets. The relevant assessment for policy purposes (and therefore decision-making purposes under the Planning Act 2008) is one that is based on the grade of the agricultural land, rather than its current use and the intensity of that use. As such, it should be noted that the Scheme Sites are predominantly ALC Grade 3b, not "best and most versatile" agricultural land (see para 19.8.4 of <b>6.2.19 ES Chapter 19 Soils and Agriculture [APP-057]</b>).</p> <p>In terms of key threats to UK food security, the Defra UK Food Security Report <sup>4</sup> highlights that the main threat is climate change.</p> <p>As the Scheme will be decommissioned, there will not be a permanent loss of agricultural land resource. In addition, the agricultural land can remain in productive use through the operational period, being grazed by livestock (see paras 19.10.2, 19.10.6, 19.10.10 of <b>6.2.19 ES Chapter 19 Soils and Agriculture [APP-057]</b>).</p> <p>The decommissioning is secured through Schedule 2, Requirement 21 of the <b>3.1 dDCO [EN010132/EX1/WB3.1_A]</b></p>

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<sup>4</sup> UK Food Security Report 2021, Department for Environment Food & Rural Affairs

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>Section 3.3 of document <b>7.11 Statement of Need [APP-320]</b>, specifically paragraphs 3.3.2, 3.3.5 and 3.3.11, describes the Government's view that large capacities of low-carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar". This support for large scale solar as part of the 'answer' to net zero and energy security has been repeated in its recent policy documents published in March 2023.</p> <p>Section 7.5 of <b>7.11 Statement of Need [APP-320]</b> describes how suitable locations for large-scale solar are identified and assessed. Paragraph 7.5.2 outlines the broad criteria for determining site suitability.</p> <p>Figure 7.4 shows the level of photovoltaic power potential at the proposed location. Section 9 describes the advantages of connecting large-scale solar to the existing and robust National Electricity Transmission System at the proposed Point of Connection at West Burton Power Station, and Paragraph 9.4.4 concludes that the Scheme will contribute to national system adequacy and decarbonisation targets.</p>



**Table 2.5.7: Applicant's Response to Lanpro Services (on behalf of Cottam Solar Project) [RR-181]**

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
CSP-01	General	Context of Relevant Representation	Cottam Solar Project Limited is the undertaker for the Cottam Solar Project DCO (PINS reference EN010133). The DCO application for the Cottam Solar Project was accepted for examination on the 9th February 2023. Cottam Solar Project Limited wishes to register as an Interested Party for the West Burton Solar Project DCO Examination, as it may wish to participate in the Examination given the proximity of the two schemes, the commonality of certain stakeholders and the potential for similar or cumulative environmental effects and coordination of mitigation measures.	The Applicant notes the comment.
CSP-02	Principle of Development (DCO)	Draft DCO	Protective provisions for the benefit of Cottam Solar Project Limited have also been included within the draft DCO for the West Burton Solar Project.	The Applicant notes the comment. A Cooperation Agreement has also been entered into between the Applicant, Cottam Solar Project Limited, Gate Burton Energy Park Limited and Tillbridge Solar Limited.
CSP-03	General (Procedure)	Examination Process	The Examining Authority for the West Burton Solar Project DCO Examination may also wish to direct related questions to Cottam Solar Project Limited.	The Applicant notes the comment.

**Table 2.5.8: Applicant's Response to Nicholas Hill [RR-238]**

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
NH-01	Principle of Development Planning History Alternatives and Design Evolution	Nature of the Scheme	"I have been granted planning permission (west Lindsey application number 145882)for 2 agricultural buildings and a yard for my new agricultural business I had great support for my application and the only negative objection was from Gate Burton energy park please read the planning application and all the comments and all the documents relating to this application my new agricultural business agricultural buildings and yard are directly on the grid connection at its narrowest point if this proposal goes a forward it could totally wreck my new agricultural business I will not allow this to happen and will have no choice but to fight this proposal till the bitter end please understand the devastating impact this proposal will have on mine and my family's life if granted."	<p>The design of the cable route for the Scheme, and the consideration of alternatives that has been undertaken is set out in <b>6.2.5 Environmental Statement - Chapter 5 Alternatives and Design Evolution [APP-043]</b>. This document includes the consideration of alternative sites (Section 5.5), alternative technologies (Section 5.6), alternative layouts (Section 5.7), alternative substation locations (section 5.8) and most importantly, in relation to the Party's comment, alternative cable routes (Section 5.9). Paragraphs 5.10.2, 5.10.3 and 5.10.4 <b>[APP-043]</b> conclude that alternative potential development areas did not perform as well as the Sites. As such, the routing of the cable is reflective of the land required for the Scheme which has been demonstrated (within <b>6.3.5.1 Environmental Statement - Appendix 5.1 Site Selection Assessment [AS-004]</b>) to perform better than 8 of the assessed Potential Development Areas (PDAs) and equal to the remaining one following the site selection process.</p> <p>The Applicant is aware of the recent grant of planning permission for the erection of 2 agricultural barns, on 18<sup>th</sup> January 2023. The Applicant has undertaken technical modelling work to confirm that the cables for the Scheme</p>



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				and the other NSIP projects would all fit within the order limits without impacting upon the barns, and intends to discuss this in detail with the landowner.
NH-02	General (Procedure)	Cumulative Assessment	"This single application should be looked at with Gate Burton energy park, cottom 1,2,3 and till bridge solar park"	<p>Cumulative effects assessments have been prepared for the Application within <b>the Environmental Statement [APP-039 to APP-061]</b>. Cumulative effects assessments for each environmental topic are set out in each of the ES Chapters and include the assessment of the impacts of the Scheme cumulatively with the NSIPs identified in paragraph 2.5.9 of <b>6.2.2 Environmental Statement - Chapter 2 EIA Process and Methodology [APP-040]</b>. This assessment is in accordance with Schedule 4 of the 2017 EIA Regulations and PINS Advice Note 17. The mitigation measures set out across the ES therefore account for anticipated cumulative effects.</p> <p>A cumulative effects assessments summary table which has the assessments for West Burton alongside Cottam, Gate Burton and Tillbridge will be provided as part of the <b>WB8.1.9_A Joint Interrelationships with other Nationally Significant Infrastructure Projects [EN010132/EX1/WB8.1.9_A]</b> being drafted during examination stage to ensure updates from the</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				publication of the PEIR for Tillbridge Solar are included in the decision-making process.
NH-03	General (Consultation)	The Applicant	"having had dealing with these company's I feel these company's will bully and pressure to achieve there objectives and in my opinion are not to be trusted its all about them making money in my opinion"	<p>The Applicant notes this comment and refers the Party to Figure 1.1 and Table 1.2 in <b>5.1 Consultation Report [APP-022]</b> which detail the key stages of pre-application consultation.</p> <p>Chapter 7 of <b>5.1 Consultation Report [APP-022]</b> describes the Applicant's approach to statutory consultation, including consulting with relevant authorities on a draft Statement of Community Consultation. Table 7.1 sets out the comments received from local authorities on the Applicant's approach to consultation and how these were considered by the Applicant. Table 7.3 in Chapter 7 describes how the Applicant complied with commitments made in the Statement of Community Consultation when undertaking statutory consultation.</p> <p>The Applicant shared the results of consultation with consultees and communities following each phase of consultation by publishing interim Consultation Summary Reports. The Applicant has taken an issue-led approach to considering comments, in order to incorporate feedback and address concerns where practicable.</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>The Applicant is confident that the methods used, level of consultation undertaken and information presented throughout the pre-application stage met the legislative requirements of the Planning Act 2008 and associated guidance, which makes clear the importance of consulting local communities and parish councils. This is set out in detail in <b>5.1 Consultation Report [APP-022]</b>, which was submitted to the Planning Inspectorate and accepted for examination.</p> <p>When deciding whether to accept an application for examination, the Planning Inspectorate takes into account any Adequacy of Consultation Representations from relevant local authorities on whether the Applicant has complied with s42, s47 and s48 of the Planning Act 2008. The Applicant notes that 24 relevant local authorities submitted Adequacy of Consultation Representations to confirm the statutory consultation process was considered adequate <b>[AoC-001 to AoC-014]</b>.</p>

**Table 2.5.9: Applicant's Response to Philip Bartle [RR-259]**

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
PB-01	General	Context of Relevant Representation	"I am Registering as I am a tenant farmer who farms the land on which will be used to take the cable line to Cottam and I would like to be kept informed of all situation which may affect my cropping etc."	<p>The Applicant notes the comment and acknowledges that the land subject to this comment is within the Cable Route Corridor for the Scheme.</p> <p>The Applicant has issued the respondent with the notices and correspondence required under Section 42 and Section 56 of the Planning Act 2008, as they are registered as a tenant having land interests falling within the Order Limits for the Scheme within the Cable Route Corridor.</p>

**Table 2.5.10: Applicant's Response to Rodger Brownlow [RR-281]**

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
RB-01	General Alternatives and Design Evolution Ecology and Biodiversity	Context of Relevant Representation	Cable crossing my land. Concern about disrupting wet marshland	<p>The Applicant notes the comment.</p> <p>The Applicant has issued the respondent with the notices and correspondence required under Section 42 and Section 56 of the Planning Act 2008, as they are registered as a tenant, having land interests falling within the Order Limits for the Scheme within the Cable Route Corridor. The potential impacts resulting from installation of the cable are assessed within <b>6.2.9 Environmental Statement - Chapter 9 Ecology and Biodiversity [APP-047]</b>. The <b>7.17 Outline Ecological Protection and Mitigation Strategy [APP-326]</b>, which is secured by Requirement 8 in Schedule of the <b>dDCO [EN010132/EX1/WB3.1_A]</b>, sets out how grassland habitat types, such as floodplain grazing, will be reinstated following installation of the cable. There are commitments to enhance the habitats that are affected during the cable route installation in instances where the original turf cannot be reinstated. In these cases, an appropriate seed mix will be used which will be in keeping with, or of greater diversity than, the habitat type and species assemblage as recorded during baseline habitat surveys.</p>

**Table 2.5.11: Applicant's Response to Sally Elliott [RR-289]**

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
SE-01	Landscape and Visual Impact  Scheme Description	Loss of Views and Impact on Privacy	"1. VIEWS & PRIVACY Our property and farming business is in a beautiful rural location. The proposed solar panels project is only 59 metres away from our garden boundary overlooking directly into our kitchen, lounge, private patio bedrooms. The 4.5 m solar panels are a total blot on the landscape and will completely ruin our private views to the south towards Lincoln and Easterly aspects. Furthermore the security cameras on the fences will be a total invasion of our privacy. This is causing our whole family anxiety and stress. Our family's future is heavily invested in our arable farm and this will greatly affect our future plans moving forward."	<p><b>6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> (the 'LVIA') has considered both the landscape and visual effects of the Scheme, including the proximity to people's houses, views and privacy, to ensure the impacts and effects on the views and visibility have been taken into account (paras. 8.4.28 to 8.4.32). This includes singular buildings, groups of buildings and towns or villages. Table 8.15 of the LVIA sets out the selection of initial residential receptors for the purpose of the assessment and the reason for their selection are those receptors within the 1km Study Area for the Scheme and the 0.5km Study Area from the outer boundary of the Cable Route Corridor (para. 8.4.12). The detailed analysis is set out at <b>6.3.8.3 Environmental Statement - Appendix 8.3 Assessment of Potential Visual Effects [APP-074]</b>. Please refer to Residential Receptor R024 Castle Farm which was one of the residential viewpoints assessed in the LVIA.</p> <p>Mitigation, including offsets and planting, has been proposed to address and minimise adverse effects on the character of the landscape and promote wildlife conservation. This is in line with the agreed methodology and the hierarchy of approach advocated by the Guidelines for Landscape and Visual Impact Assessment, 3rd</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>Edition and matters agreed with LCC at the series of workshops set out in <b>6.3.8.4 Environmental Statement - Appendix 8.4 Consultation [APP-075]</b>.</p> <p>For example, the assessment has taken account of the 50m off set from residential properties to ensure the best possible fit with their setting. The photography and photomontage information at <b>6.4.8.13.1 – 6.4.8.13.72 Environmental Statement Figures 8.14.1 to Figure 8.14.72 [APP-194 to APP-265]</b> shows how the proposed landscape mitigation will play a key role in making sure the panels are comfortably accommodated within the existing landscape.</p> <p>Security CCTV will be mounted on poles no more than 3m in height, and will be directed to face into the site, as stated in paragraph 4.5.59 of <b>6.2.4 Environmental Statement - Chapter 4 Scheme Description [APP-042]</b>. The Applicant has no need to view and monitor land using CCTV beyond the Order Limits.</p>
SE-02	Other Environmental Matters (Human Health, Electromagnetic Fields)	Impact on Human Health	"2. HEALTH RISKS My husband Neil Elliott suffers with Electromagnetic Hyper Sensitivity- to the extent of severe headaches, dizziness and nausea. The electrical inverters are very close to our property boundary with the proposed solar panels area. According to the World Health Organisation, the range of symptoms that are	<p>The Applicant has corresponded with the Party during the Section 42 consultation on this matter. The Applicant and was emailed the Party on the 2 September 2022, stating the following:</p> <p><i>"Looking at our preliminary site layout plans, we can confirm the panels will be at least 70 metres from</i></p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>triggered by exposure to electromagnetic radiation fields (EMF) These are:- headaches, fatigue, skin rashes and sleep disturbance. All are very serious and will affect quality of life if exposure is increases to where we live. They further state that the people who are affected by EMF are not to live close to solar panels project."</p>	<p><i>your property and at least 50 metres from your curtilage.</i></p> <p><i>As part of our scoping work, we undertook an electromagnetic fields assessment. The conclusions of the assessment were that the electrical equipment would not generate high enough electromagnetic fields to require further investigation work or mitigation. Levels of electromagnetic radiation are all predicted to be well below the 1998 International Commission on the Non-Ionising Radiation Protection (ICNIRP) reference levels at all surrounding locations where, if exceeded, further investigation into impacts to human health is warranted.</i></p> <p><i>We understand your concerns about the potential visual impacts of the proposals. As part of Preliminary Environmental Information Report (PEIR) the project team have undertaken a full Landscape and Visual Impact Assessment (LVIA). The full details of our LVIA can be found in chapter 8 of West Burton PEIR online here. To minimise the visual impact of our proposals as much as possible features such as and hedgerows, trees and ditches will be protected and enhanced where possible. Our secondary mitigation measures will also look to achieve the retention of all trees and hedgerows across the site in addition to a scheme of planting. These measures are currently being developed in addition to the layouts for each Site. These measures will look to</i></p>



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p><i>add inherent value to the landscape character and visual amenity of the site and its environment and to exceed planning policy expectations.</i></p> <p><i>Regarding the proposals potential effect on property prices, we understand that this is a very important issue to the local community, as was conveyed in the feedback that we received during both phases of our consultation process. As far as we are aware, there is no empirical research or evidence that suggests solar farms affect property values. As such, we do not expect this to happen. However, our first principle is to ensure that we design a project which minimises effects on residential properties to an acceptable level, thereby mitigating any potential effect on property value. "</i></p> <p>The Applicant's position regarding EMF has not changed since the above response was provided to the Party and is set out in Section 21.2 of <b>6.2.21 Environmental Statement - Chapter 21- Other Environmental Matters [APP-059]</b>.</p> <p>The World Health Organisation have published information and guidance surrounding electromagnetic fields<sup>5</sup> which recognises that "short-term exposure to very high levels of</p>

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<sup>5</sup> World Health Organisation (2016). Radiation: Electromagnetic fields. Available at: <https://www.who.int/news-room/questions-and-answers/item/radiation-electromagnetic-fields> [Accessed 31 May 2023].

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				electromagnetic fields can be harmful to health", but that "despite extensive research, to date there is no evidence to conclude that exposure to low level electromagnetic fields is harmful to human health."
SE-03	Scheme Description Alternatives and Design Evolution Hydrology, Flood Risk and Drainage	Cable Construction	"3. CABLES The 1430 metres of trenches for the cabling to the proposed solar park to be dug across our agricultural fields to a Width of 3 metres and Depth of 1.2 metres. This will cause a lot of damage to our essential valuable land drainage system. Once it has all been dug through by the contractors and then our land is to be supposedly reinstated to it's original condition. The method is entirely unsatisfactory because the drains will sink and stop working, therefore not clearing the excess water away from our land where the crops are planted. This will be catastrophic for our agricultural land , as it will become waterlogged and cost us 100's of thousands of pounds to rectify. The percentage level of compensation stated in the documents is UN-WHOLLY UNACCEPTABLE. It is no-where near the true amount of costs to rectify the damage."	<p>Landowners along the proposed Cable Route Corridor, including this Party, have been identified and contacted in order to commence discussions regarding the laying of cables as part of the Scheme. An in-person site meeting took place with these landowners on 22nd February 2023. The landowners have concerns with the solar site layout adjacent to their property and so do not wish to negotiate terms on the cable route any further. The Applicant regularly continues to confirm this is the case via contact with their land agent.</p> <p>The Applicant recognises that as the comment refers to private land drains, these have not been identified in <b>7.15_A Crossing Schedule Revision A [AS-001]</b>. Nevertheless, land drains on the land subject to which this comment relates have been identified through <b>6.3.13.2 Environmental Statement - Appendix 13.2 Archaeological Geophysical Survey Reports - Part 5 of 6 [APP-113]</b>, specifically pages 58-63.</p> <p>Impacts on utility infrastructure will be mitigated through the measures set out in Table 3.14 in</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p><b>7.1_A Outline Construction Environmental Management Plan Revision A [EN010132/EX1/WB7.1_A]</b> (CEMP) and have been expanded to include for private land drains. These measures are secured as part of the Scheme through Requirement 13 of Schedule 2 to <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>. The Applicant is confident that the soil retention and reinstatement proposals set out in <b>6.3.19.2 Environmental Statement Appendix 19.2 Outline Soil Management Plan [APP-138]</b> are sufficient to ensure long-term damage to buried infrastructure as a result of trenching on the Cable Route is mitigated. This is secured through Schedule 2, Requirement 19 of <b>3.1 dDCO [EN010132/EX1/WB3.1_A]</b>.</p>
SE-04	Principle of Development General (Consultation)	Financial Compensation	<p>"4. LEVEL OF COMPENSATION These have been no where near the level is should have been, there has not been enough contact directly with Island Green Power to ourselves, as land owners, or to the wider community. There should have been more detailed meetings taken place with the landowners directly affected. The arrangement of consultations between Island Green Power and the landowners has not been</p>	<p>The Applicant has a statutory obligation under the Planning Act 2008 to identify, contact and consult with landowners affected by the Scheme.</p> <p>Throughout the consultation process the Applicant has welcomed feedback from a range of stakeholders, including communities, landowners and occupiers, on the Scheme proposals. The outcome of this consultation and engagement is evidenced in <b>5.1 Consultation Report [APP-022]</b>, which was submitted to the</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			<p>dealt with adequately, it should have been a two-way procedure."</p>	<p>Planning Inspectorate and accepted for examination.</p> <p>For example, Table 1.1 of Chapter 1 <b>[APP-022]</b>, details how the Cable Route Corridor for the Scheme has been refined through engagement and consultation with landowners and the community.</p> <p>Table 1.2 of Chapter 1 <b>[APP-022]</b>, details how the Applicant provided consultation documents to landowners to inform them regarding upcoming statutory consultation and methods to provide feedback.</p> <p>Chapter 7 <b>[APP-022]</b> describes the Applicant's approach to statutory consultation, including consulting with relevant authorities on a draft Statement of Community Consultation. Table 7.1 sets out the comments received from local authorities on the Applicant's approach to consultation and the Applicant has had regard to these in developing the Scheme. Table 7.3 in Chapter 7 describes how the Applicant complied with commitments made in the Statement of Community Consultation when undertaking statutory consultation.</p> <p>Chapter 8 <b>[APP-022]</b> describes how the Applicant undertook a six-week statutory phase two consultation on the Scheme, to provide communities, stakeholders and landowners a</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>sufficient period of time, and sufficient environmental information about the Scheme, to provide meaningful feedback. A Consultation Summary Report for this phase of statutory consultation was published on the dedicated Scheme website, shared with elected representatives and stakeholders and issued to over 9,000 properties within the vicinity of the Scheme, to help consultees understand how their feedback was being considered. A copy of the Phase Two Consultation Summary Report is provided as <b>5.7 Appendix 5.7: Phase Two Community Consultation Materials [APP-029 to APP-031]</b>.</p> <p>Chapter 11 of <b>5.1 Consultation Report [APP-022]</b> describes the significant volume of responses received to Section 47 consultation (local community), including the issues raised and how the Applicant has had regard to these in developing the Scheme. This is further evidenced by <b>5.12 Appendix 5.12: Consultation Report Appendix – Section 47 Applicant Response [APP-036]</b>.</p> <p>20 responses were received to Section 42 consultation from Section 44 landowners. How the Applicant has had regard to these in developing the Scheme is evidenced in <b>5.13</b></p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response																
				<p><b>Appendix 5.13: Consultation Report Appendix – Section 42 Applicant Response [APP-037].</b></p> <p>Dalcour Maclaren have made the following attempts to communicate with Mr Elliot (as the registered freeholder) regarding the project to date:</p> <table border="1"> <tr> <td>24/09/21</td> <td>Landowner Questionnaire (LOQ) issued</td> </tr> <tr> <td>28/09/21</td> <td>Phone call incoming (1)</td> </tr> <tr> <td>28/09/21</td> <td>Phone call incoming (2)</td> </tr> <tr> <td>11/10/21</td> <td>LOQ response received</td> </tr> <tr> <td>17/03/22</td> <td>Land Interest Questionnaire (LIQ) issued</td> </tr> <tr> <td>14/04/22</td> <td>LIQ response received</td> </tr> <tr> <td>14/06/22</td> <td>S.48 Notice issued</td> </tr> <tr> <td>27/04/23</td> <td>S.56 Notice issued</td> </tr> </table>	24/09/21	Landowner Questionnaire (LOQ) issued	28/09/21	Phone call incoming (1)	28/09/21	Phone call incoming (2)	11/10/21	LOQ response received	17/03/22	Land Interest Questionnaire (LIQ) issued	14/04/22	LIQ response received	14/06/22	S.48 Notice issued	27/04/23	S.56 Notice issued
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27/04/23	S.56 Notice issued																			
SE-05	Soils and Agriculture	Use of Agricultural Land	"5. REMOVING VALUABLE AGRICULTURAL LAND OUT OF USE This is completely unacceptable, as	The key policy tests for the decision maker in respect of the Scheme's impact upon agricultural																

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
	Energy Need Alternatives and Design Evolution		an independent county of the United Kingdom, we are striving for self-sufficiency to support our British Farmers and supply our own population with essential food. It is absolute lunacy for this level of solar panel projects in our area to be considered."	<p>land are found in NPS EN-1, paragraph 5.10.8, Revised Draft NPS EN-1 (2023), para 5.11.22, and Revised Draft NPS EN-3 (2023), para. 3.10.15 states <i>"Whilst the development of ground mounted solar arrays is not prohibited on agricultural land classified 1, 2 and 3a, or sites designated for their natural beauty, or recognised for ecological or archaeological importance, the impacts of such are expected to be considered and are discussed under paragraphs 2.10.66 – 2.10.83 and 2.10.98 – 2.10.110."</i> Paragraph 5.10.15 (adopted NPS EN-1) then states that the Secretary of State should give little weight to loss of ALC grades 3b, 4 and 5 agricultural land, while Revised Draft NPS EN-3, para. 3.10.136 requires the Secretary of State to ensure mitigation measures to minimise impacts on soils and soil resources are appropriately provided by the Applicant. This is addressed in Appendix 3 (pages 62 and 63) <b>7.5 Planning Statement [APP-313]</b>.</p> <p>The Applicant does not consider that the Scheme would result in adverse food security impacts either alone or cumulatively. The UK annual balance of domestically produced food is sensitive to non-planning factors including weather and markets. The relevant assessment for policy purposes (and therefore decision-making purposes under the Planning Act 2008) is one that is based on the grade of the agricultural</p>

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>land, rather than its current use and the intensity of that use. As such, it should be noted that the Scheme Sites are predominantly ALC Grade 3b, not "best and most versatile" agricultural land (see para 19.8.4 of <b>6.2.19 Environmental Statement - Chapter 19 Soils and Agriculture [APP-057]</b>).</p> <p>In terms of key threats to UK food security, the Defra UK Food Security Report <sup>6</sup> highlights that the main threat is climate change.</p> <p>Paragraph 3.3.7 of document <b>7.11 Statement of Need [APP-320]</b> describes Government's view that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar". This support for large scale solar as part of the 'answer' to net zero and energy security has been repeated in its recent policy documents published in March 2023.</p> <p>Figure 7.2 <b>[APP-320]</b> shows National Grid Electricity System Operator's projections for the future installed capacity of different electricity generation technologies in Net-Zero consistent scenarios. In all scenarios, solar is required to</p>

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<sup>6</sup> UK Food Security Report 2021, Department for Environment Food & Rural Affairs



Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
				<p>make a significant contribution to the future generation mix.</p> <p>Section 7.5 <b>[APP-320]</b> describes how suitable locations for large-scale solar are identified and assessed. Figure 7.4 shows the level of photovoltaic power potential at the proposed location and Section 7.4 describes the decarbonisation benefits of solar energy. Section 8.8 and Section 8.9 describe the energy security benefits of solar energy. Chapter 9 describes the advantages of connecting large-scale solar to the existing and robust National Electricity Transmission System at the proposed Point of Connection at West Burton Power Station. Section 9.4 concludes that the Scheme will contribute to national system adequacy and decarbonisation targets.</p> <p>Section 10.2 and Section 10.3 <b>[APP-320]</b> describe the economic benefits of solar energy within the UK electricity system.</p>
SE-06	General Principle of Development	Overall Objection	<p>"6. IN SUMMARY These are very important factors directly affecting the entire community within our agricultural business area, ALL our homes and the villages surrounding. Please read the objections and consider clearly the massive impact on our Lincolnshire historical and EXTREMELY VALUABLE FARMLAND."</p>	<p>The Applicant notes this comment.</p>



**Table 2.5.12: Applicant's Response to SNSE Ltd [RR-308]**

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
SNSE-01	Principle of Development (DCO)	Impact on Use of Land	"We object to the proposals for inclusion of infrastructure across the landowner client's land which affects their existing and future use of the land in question, south of West Burton Power Station."	The Applicant is aware of the permitted sand and gravel quarry at Sturton Le Steeple. This was discussed with Nottinghamshire County Council during engagement with them as set out <b>6.2.12 Environmental Statement - Chapter 12 Minerals [APP-050]</b> . The Cable Route Corridor has been positioned so that it crosses the quarry access road, but will not be located in the permitted area of mineral working.

**Table 2.5.13: Applicant's Response to SNSSED Ltd [RR-309]**

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
SNSSED-01	Principle of Development (DCO)	Impact on Use of Land	"We object to the proposals for inclusion of infrastructure across the landowner client's land which affects their existing and future use of the land in question, south of West Burton Power Station."	The Applicant is aware of the permitted sand and gravel quarry at Sturton Le Steeple. This was discussed with Nottinghamshire County Council during engagement with them as set out <b>6.2.12 Environmental Statement - Chapter 12 Minerals [APP-050]</b> . The Cable Route Corridor has been positioned so that it crosses the quarry access road but will not be located in the permitted area of mineral working.

**Table 2.5.14: Applicant's Response to Tillbridge Solar Limited [RR-333]**

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
TSL-01	General	Context of Relevant Representation	<p>"Tillbridge Solar Limited is proposing to build a project for the construction, operation (including maintenance) and decommissioning of ground mounted solar photovoltaic (PV) panel arrays and a Battery Energy Storage System (BESS), connecting to the National Grid (the Scheme). The Scheme is defined as a Nationally Significant Infrastructure Project under Sections 14(1)(a) and 15(2) of the Planning Act 2008 as an onshore generating station in England exceeding 50 megawatts and Tillbridge Solar will therefore make an application to the Secretary of State for a Development Consent Order (DCO) for the Scheme. The Scheme is currently in the pre-application stage and Tillbridge Solar intends to commence Statutory Consultation in Q2 2023 with the application for development consent to be submitted later in 2023. The Scheme is located approximately five kilometres to the east of Gainsborough and approximately 13 kilometres to the north of Lincoln. The Scheme comprises two distinct sections, which are: - 'the Principal Site', which is the location where ground mounted solar photovoltaic (PV) panels, electrical sub-stations and BESS will be installed; and - 'the Cable Route Corridor', which will comprise the underground electrical infrastructure required to connect the Principal Site to national</p>	The Applicant notes this comment.

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
			transmission system. The Principal Site covers an area of approximately 1,400 hectares and is located to the south of Harpswell Lane (A631), to the west of Middle Street (B1398) and largely to the north of Kexby Road and to the east of Springthorpe. The Cable Route Corridor is approximately 16km long and crosses the administrative areas of West Lindsey District Council and Bassetlaw District Council - design refinement is on-going."	
TSL-02	General (Procedure)	Registration of Interest	"Tillbridge Solar Limited wishes to register as an Interested Party for the West Burton Solar Project DCO Examination, as it may wish to participate in the Examination given the proximity of the two schemes, the commonality of certain stakeholders and the potential for similar or cumulative environmental effects and coordination of mitigation measures."	The Applicant notes this comment.
TSL-03	Principle of Development (DCO)	Protective Provisions in Draft DCO	"Tillbridge Solar Limited proposes to include protective provisions for the benefit of West Burton Solar within its development consent order and requests that West Burton Solar includes reciprocal protective provisions for the benefit of Tillbridge Solar Limited within the development consent order."	A Cooperation Agreement has been entered into between the Applicant, Cottam Solar Project Limited, Gate Burton Energy Park Limited and Tillbridge Solar Limited.  Protective provisions for the benefit of Tillbridge will be added to the draft DCO as and when the Tillbridge DCO Application has been submitted to the Planning Inspectorate (acting on behalf of the Secretary of State) and accepted for examination.

Reference	Theme	Issue	Comments / Issue Raised	Applicant's Response
TSL-04	General (Procedure)	Examination Process	"The Examining Authority for the West Burton Solar DCO Examination may also wish to direct related questions to Tillbridge Solar Limited."	The Applicant notes this comment.

### 3 Applicant's Response to Relevant Representations

#### 3.1 Air Quality

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
AIR-01	RR-010; RR-019; RR-021; RR-022; RR-034; RR-040; RR-042; RR-044; RR-053; RR-054; RR-062; RR-063; RR-066; RR-067; RR-071; RR-075; RR-079; RR-088; RR-095; RR-097; RR-102; RR-106; RR-108; RR-110; RR-115; RR-118; RR-121; RR-124; RR-137; RR-139; RR-152; RR-153; RR-154; RR-156; RR-157; RR-175; RR-190; RR-194; RR-202; RR-211; RR-220; RR-222; RR-224; RR-235; RR-246; RR-247; RR-252; RR-255; RR-272; RR-273; RR-274; RR-275; RR-276; RR-278; RR-292; RR-294; RR-301; RR-312; RR-316; RR-319;	BESS/Fire risk	<p>Concern that the Scheme will cause a fire risk.</p> <p>Some comments refer to the BESS which may cause this risk, including comments referring to lithium ion batteries.</p> <p>Some comments cite examples of previous exploded batteries.</p> <p>Some comments refer to the Leeds battery facility dropped by the developers due to the West Yorkshire Fire and Rescue Service stating that there is a very real risk of an explosion.</p>	<p>The risk to human health as a result of fires or unconfined explosions within the BESS compound has been assessed asset out in paragraphs 21.6.42 to 21.6.48 of <b>6.2.21 Environmental Statement - Chapter 21 Other Environmental Matters [APP-059]</b> This concludes that there is no significant risk of harm to human health due to the physical separation of the BESS compound from publicly accessible areas.</p> <p>The Applicant has submitted <b>7.9 Outline Battery Storage Safety Management Plan [APP-318]</b> and, through <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>, secures through Requirement 6 (1) of Schedule 2 that "Work No. 2 (the BESS facility) must not commence until a battery storage safety management plan has been submitted to and approved by the relevant planning authority" and (3) of Requirement 6 which requires "The relevant planning authority must consult with Lincolnshire Fire and Rescue and the Environment Agency before determining an application for approval of the battery storage safety management plan".</p>



Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
	RR-325; RR-327; RR-328; RR-340		Some comments refer to a perceived lack of arrangements in place from the developer to deal with a potential fire.	Paragraph 4.1.18 of <b>7.9 Outline Battery Storage Safety Management Plan [APP-318]</b> explains that the design of the BESS has integrated fire detection and suppression systems that will automatically operate to contain any battery fires. Section 5.2 of the Plan demonstrates how the Site has been designed to allow for firefighting access. Paragraph 5.3.1 states that if fire spreads to multiple units, external firefighting water facilities are available by means of 228,000 litre water storage tanks within the battery compounds. The design of firefighting and fire suppression systems has been informed by consultation with both Lincolnshire's and Nottinghamshire's fire and rescue authorities throughout the pre-submission process. Furthermore, Lincolnshire County Council state they are "satisfied that the details meet the requirements the Council set out in Fire Safety Position statement" <b>[RR-188]</b> .
			Some comments refer to the BESS as a risk to children in the local area.  Some comments refer to locating the BESS in close proximity to residential properties as dangerous.	The technical report <b>6.3.17.4 Environmental Statement - Appendix 17.4 BESS Fire Technical Note [APP-136]</b> assesses potential impacts associated with a battery fire at the West Burton BESS Site (located within the West Burton 3 Site). The closest residential receptors are located more than 490m away from the BESS Site boundary. The assessment report concluded that there is low risk of adverse effects at the closest receptors and good practice BESS fire safety measures

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
			<p>Some comments refer to potential of releasing poisonous gas if a fault with the BESS should occur.</p> <p>Some comments refer to potential fires causing asthma attacks.</p>	<p>have been produced in the case of a BESS fire at the proposed development.</p> <p>The Applicant is undertaken additional fire risk and plume assessment for the BESS. This document is intended to provided consistency in approach to air quality assessment across NSIPs in the West Lindsey area as requested by UKHSA. This will be submitted at Deadline 2.</p> <p>Potential battery fire impacts have been assessed using dispersion modelling tools to ensure the protection of human health and the health of workers. The predicted BESS fire pollutant concentrations at relevant sensitive receptor locations are assessed and compared against relevant UK Air Quality Standards for the protection of human health, relevant British occupational exposure limits for the protection of the health of workers, and the UK Daily Air Quality Index (DAQI). The DAQI tells the public about levels of air pollution and provides recommended actions and health advice for at-risk individuals including adults and children with lung problems and adults with heart problems.</p>
			<p>Some comments refer to the BESS located at Willingham by Stow as one of the world's largest BESS.</p>	<p>The Applicant understands this refers to the BESS as part of the nearby Cottam Solar Project (<b>PINS reference: EN010133</b>), which is not part of this Scheme. The Applicant therefore refers the Interested</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				Parties to the documents available on the Cottam Solar Project page on the PINS website.
			Some comments refer to the BESS being a danger to health due to EMR (electromagnetic radiation).	Guidance for controlling levels of electromagnetic fields (EMF) generated by electrical infrastructure is based on ICNIRP (1998) monitoring levels detailed in para. 21.2.3 of <b>6.2.21 Environmental Statement - Chapter 21 Other Environmental Matters [APP-059]</b> . EMF strength decreases rapidly with distance away from sources, and the BESS compound is located more than 300m from any residential property or location accessible to the public. EMF generated by the BESS is not anticipated to exceed ICNIRP monitoring levels even within the BESS compound, and thus it is concluded there is no impact on human health resulting from EMF from the BESS.
			Some comments refer to a need for an independent study to take place to provide rigorous scrutiny of the BESS.	The documentation submitted by the Applicant will be reviewed and scrutinised through the examination process by: the Examining Authority on behalf of the Planning Inspectorate, the host Local Planning Authorities, any relevant Statutory Undertakers such as the UK Health Security Agency and the Health and Safety Executive and any other interested parties, as required.  Furthermore, <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> secures through Requirement 6 of Schedule 2 "Work No. 2 (the

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p>BESS facility) must not commence until a battery storage safety management plan has been submitted to and approved by the relevant planning authority" and (3) of Requirement 6 which requires "The relevant planning authority must consult with Lincolnshire Fire and Rescue and the Environment Agency before determining an application for approval of the battery storage safety management plan". This therefore provides a further opportunity for detailed management of the BESS to be scrutinised.</p>
			<p>Some comments refer to BESS materials being untested and from dubious quality sources.</p>	<p>Paragraph 5.4.7 of <b>7.10 Outline Skills Supply Chain and Employment Plan [APP-319]</b> states that "Any procurement of supplies internationally will comply with both national and international law, and all policy and safety measures will be adhered to in the transportation of supplies."</p> <p>The Applicant confirms that a detailed Skills, Supply Chain and Employment Plan is secured by Requirement 20 of Schedule 2 to <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>. This requirement states that "No part of the authorised development may commence until a skills, supply chain and employment plan in relation to that part has been submitted to and approved by the relevant planning authority for that part or, where the part falls within the</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				administrative areas of multiple planning authorities, each of the relevant planning authorities."
			Some comments refer to impacts on the quality of agricultural land in China due to lithium ion batteries and warn not to follow in their footsteps with this Scheme.	<p>The impacts on the quality of agricultural land in China have not been assessed within the Environmental Statement. The Applicant assumes the Party is making reference to the sourcing of raw materials. Paragraph 5.4.7 of <b>7.10 Outline Skills Supply Chain and Employment Plan [APP-319]</b> states that "Any procurement of supplies internationally will comply with both national and international law, and all policy and safety measures will be adhered to in the transportation of supplies."</p> <p>A detailed Skills, Supply Chain and Employment Plan is secured through Requirement 20 in Schedule 2 of the <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p>
AIR-02	RR-007; RR-019	Microclimate	<p>Concern that a microclimate will be created.</p> <p>Some comments refer to a microclimate in Saxilby if the Scheme goes ahead.</p>	<p>Solar farms have the potential to affect the microclimate beneath panels, which could impact on the potential growth of certain plant species. The planting and monitoring for the Scheme is provided within <b>7.3_A Outline Landscape and Ecological Management Plan Revision A [EN010132/EX1/WB7.3_A]</b>, as secured by Requirement 7 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p> <p>The ecological assessments carried out within <b>6.2.9 Environmental Statement - Chapter 9 Ecology and</b></p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p><b>Biodiversity [APP-047]</b> are based on the considered professional judgment of an experienced ecological consultant who has been involved with the monitoring of nearly 200 active solar farms in the UK. At present, the Order Limits almost entirely occupy intensively managed arable systems which constitute a relatively modern and man-made habitat. The proposed Scheme will result in the reversion of this system to low-input and extensively-managed semi-natural grassland types. While it is true that the presence of solar panels has the potential to cause local shading directly beneath them, valuable grassland habitat mosaics can be successfully created in a relatively short space of time, and this is what is proposed as part of this Scheme, which will result in an anticipated biodiversity net gain (See paragraphs 2.2.2, 4.7.6 and Appendix B of <b>7.3_A Outline Landscape and Ecological Management Plan Revision A [EN010132/EX1/WB7.3_A]</b>).</p>

### 3.2 Alternatives and Design Evolution

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
ALT-01	RR-003; RR-006; RR-010; RR-011; RR-013; RR-015; RR-020; RR-021; RR-022; RR-026; RR-027; RR-036; RR-040; RR-045; RR-049; RR-052; RR-053; RR-061; RR-064; RR-066; RR-067; RR-070; RR-072; RR-074; RR-078; RR-079; RR-082; RR-085; RR-096; RR-097; RR-100; RR-102; RR-104; RR-105; RR-106; RR-107; RR-108; RR-110; RR-112; RR-115; RR-116; RR-121; RR-129; RR-131; RR-132; RR-134; RR-136; RR-138; RR-142; RR-143; RR-145; RR-150; RR-152; RR-153; RR-156; RR-159; RR-161; RR-162; RR-163; RR-164; RR-166; RR-168; RR-169; RR-170; RR-173; RR-174; RR-175; RR-180; RR-183; RR-185; RR-187; RR-190;	Alternative sites	<p>Comments that brownfield sites should have been considered or chosen to host solar panels instead.</p> <p>Some comments refer to industrial build locations as possible sites e.g. commercial roofs.</p> <p>Some comments refer to new build houses as possible sites.</p> <p>Some comments refer to existing houses as possible sites.</p> <p>Some comments refer to retired airfields, e.g. RAF Scampton, as a possible site.</p> <p>Some comments refer to ex Ministry Of Defence sites.</p> <p>Some comments refer to car parks as a possible site, including roofs on car parks, and cite French examples of this in practice.</p>	<p>Section 3.3 of document <b>7.11 Statement of Need [APP-320]</b>, specifically paragraphs 3.3.5 and 3.3.11, describes the Government's view that large capacities of low-carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that <i>"a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar"</i>. This support for large scale solar as part of the 'answer' to net zero and energy security has been repeated in the draft national policy statements EN-1 and EN-3, published in March 2023.</p> <p>Paragraph 7.6.3 <b>[APP-320]</b> analyses the potential contribution of "brownfield" solar sites to the national need for solar generation. Brownfield sites, including rooftop and other community energy systems, are likely to grow in the UK and will make a contribution to decarbonisation of the UK energy system.</p> <p>However, <b>7.11 Statement of Need [APP-320]</b> concludes in Section 7.6, that on their own, brownfield developments are unlikely to be able to meet the national need for solar. Paragraph 8.5.10 and Section 8.5 more generally <b>[APP-320]</b> describe and express</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
	RR-191; RR-192; RR-194; RR-196; RR-199; RR-202; RR-203; RR-206; RR-209; RR-210; RR-214; RR-217; RR-221; RR-222; RR-223; RR-227; RR-228; RR-229; RR-239; RR-241; RR-247; RR-252; RR-254; RR-257; RR-258; RR-264; RR-267; RR-271; RR-273; RR-276; RR-278; RR-284; RR-290; RR-292; RR-295; RR-301; RR-303; RR-305; RR-306; RR-307; RR-311; RR-312; RR-318; RR-325; RR-330; RR-332; RR-339; RR-343; RR-348		<p>Some comments refer to the decommissioned power station sites as possible sites.</p> <p>Some comments refer to central reservations on motorways as possible sites.</p> <p>Some comments refer to nearby moors housing sheep as possible sites.</p> <p>Some comments refer to the North Sea as a possible site.</p> <p>Some comments refer to placing solar panels in a different location in a general manner.</p> <p>Some comments request solar panels on buildings to become UK law.</p>	<p>agreement with Government's view that decentralised and community energy systems are unlikely to lead to the significant replacement of large-scale infrastructure. The Applicant therefore supports the Government's view that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p> <p>The consideration of alternatives has been undertaken within <b>6.2.5 Environmental Statement - Chapter 5 Alternatives and Design Evolution [APP-043]</b> and its accompanying appendix <b>6.3.5.1_A Environmental Statement - Appendix 5.1 Site Selection Assessment Revision A [AS-004]</b>. Specifically, paragraphs 2.1.23 to 2.1.31 detail the consideration of brownfield land and roof tops and sets out why these were discounted as unsuitable. The methodology used for the site selection process is considered reasonable and proportionate and complies with the requirements of NPS EN-1 4.4.3.</p>



Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
ALT-02	RR-003; RR-005; RR-007; RR-008; RR-010; RR-011; RR-013; RR-015; RR-019; RR-021; RR-022; RR-026; RR-034; RR-040; RR-045; RR-053; RR-054; RR-057; RR-062; RR-063; RR-066; RR-069; RR-072; RR-080; RR-082; RR-083; RR-095; RR-103; RR-106; RR-110; RR-111; RR-115; RR-119; RR-126; RR-129; RR-139; RR-155; RR-156; RR-157; RR-160; RR-164; RR-168; RR-171; RR-173; RR-175; RR-194; RR-196; RR-198; RR-202; RR-205; RR-210; RR-220; RR-222; RR-224; RR-225; RR-226; RR-228; RR-247; RR-251; RR-252; RR-257; RR-269; RR-271; RR-272; RR-278; RR-303; RR-304; RR-307; RR-312; RR-325; RR-334; RR-336; RR-338	Efficiency of Solar	Solar is an inefficient source of power compared to alternatives, for a variety of reasons.	Section 3.3 of document <b>7.11 Statement of Need [APP-320]</b> , specifically paragraphs 3.3.5 and 3.3.11, describes the Government's view that large capacities of low-carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that " <i>a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar</i> ". This support for large scale solar as part of the 'answer' to net zero and energy security has been repeated in the draft national policy statements EN-1 and EN-3, published in March 2023.
			Some comments refer to solar inefficiency in terms of energy output.	Paragraph 5.5.8 of <b>7.11 Statement of Need [APP-320]</b> states that solar generated 11.7TWh of energy in 2019, over 12.1TWh in 2020 and 2021 generation was 11.2TWh: an important and reliable annual contribution to national demand.
			Some comments refer to statistics which indicate that solar is an inefficient source of energy.	Table 7.1 of <b>7.11 Statement of Need [APP-320]</b> shows the electricity generated per hectare by different low-carbon technologies. At the UK's average solar load factor (11%), solar generation produces much more energy per hectare than biogas, and generates a similar amount of energy as onshore wind.  Furthermore, paragraph 7.6.8 of <b>7.11 Statement of Need [APP-320]</b> states that: "Draft NPS EN-3 includes an anticipated range of 2 to 4 acres for each MW of

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p>output generally required for a solar farm along with its associated infrastructure." The Scheme as proposed delivers a large-scale solar generation asset which is consistent with this range, as is described through paragraphs 4.2.1 to 4.2.3 of <b>6.2.4 Environmental Statement – Chapter 4 Scheme Description [APP-042]</b>. This demonstrates that the proposed locations for the Scheme are suitable sites which can accommodate an asset which is consistent with government's view of best practice ratios of land take and installed capacity.</p>
			<p>Some comments refer to the operation length of 40 years exacerbating the negative feeling towards solar inefficiency.</p>	<p>The Applicant notes this comment and is cognisant that the operational lifetime of the Scheme will be felt as substantial to those living in the surrounding area. the assessments within the <b>Environmental Statement [APP-039 to APP-061]</b> assess the effects of the Scheme throughout its operational lifetime. Furthermore, the mitigation and enhancement measures set out in the ES and secured through the relevant control documents will be in place for the lifetime of the Scheme. This therefore means that enhancement measures that form part of the Scheme will also be in place for at least the assessed operational lifetime. These enhancement measures include:</p> <ul style="list-style-type: none"> <li>• Enhancements to local employment and to qualification and skills attainment (please refer to <b>6.2.18 Environmental Statement - Chapter 18</b>)</li> </ul>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p><b>Socio Economics Tourism and Recreation [APP-056] and 7.10 Outline Skills Supply Chain and Employment Plan [APP-319]);</b></p> <ul style="list-style-type: none"> <li>• Enhancements to recreational walking as a result of a new permissive path (please refer to <b>6.2.4 Environmental Statement - Chapter 4 Scheme Description [APP-042]</b> and <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b>);</li> <li>• Biodiversity Net Gain (please refer to <b>6.2.9 Environmental Statement - Chapter 9 Ecology and Biodiversity [APP-047]</b> and <b>6.3.9.12 Environmental Statement - Appendix 9.12 Biodiversity Net Gain Report [APP-088]</b>);</li> <li>• Landscape and ecological enhancements (please refer to <b>6.4.8.18.1_A-6.4.8.18.3_A Environmental Statement – Figures 8.18.1-A to 8.18.3-A – Landscape and Ecology Mitigation and Enhancement Measures [WB6.4.8.18.1_A to WB6.4.8.18.3_A]</b> and <b>7.3_A Outline Landscape and Ecological Management Plan [EN010132/EX1/WB7.3_A]</b>); and</li> <li>• Community Benefit Fund (refer to paragraph 4.8.1 of <b>7.5 Planning Statement [APP-313]</b>) (it is noted that this does not form part of the Scheme, but is</li> </ul>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p>being delivered as a separate commitment by the Applicant).</p> <p>The environmental benefits from the Scheme as identified in the Environmental Statement, its appendices, and other documents supporting the DCO Application, are secured by the requirements as set out in Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p>
			<p>Some comments refer to solar inefficiency due to location of the Scheme in comparison to other locations, examples used are southern England and other countries such as Australia.</p> <p>Some comments refer to solar inefficiency due to change in weather conditions, seasonal changes and lack of operation at night.</p>	<p>Paragraphs 3.3.17 and 3.3.18 of <b>7.11 Statement of Need [APP-320]</b> explain the Government's view that irradiance, site topography and proximity to suitable connection points to the transmission network are likely to be key inputs to site selection. Section 7.5 of <b>7.11 Statement of Need [APP-320]</b> describes the site selection process for large-scale solar more fully, and Section 7.7 of <b>7.11 Statement of Need [APP-320]</b> sets out how the design of the Scheme seeks to maximise utilisation of the grid connection capacity available at the West Burton National Grid Substation. Figure 7.4 of <b>7.11 Statement of Need [APP-320]</b> shows the level of photovoltaic power potential at the proposed location.</p>
			<p>Some comments refer to solar inefficiency in relation to the cost of construction of panels and installing them.</p>	<p>Solar panels and electrical infrastructure have become larger and more efficient. Figure 10.2 of <b>7.11 Statement of Need [APP-320]</b> shows that many solar cells are over 20% efficient and some are within reach of 30% efficiency, meaning that more low-carbon</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				electricity can be generated from the same area of land compared to what was previously possible.
			Some comments refer to solar inefficiency in relation to the amount of land being used for the Scheme.	The quoted 20-30% efficiency figures refer directly to the panels' ability to convert the sunlight that is striking them at any given moment to electrical energy. The UK's average solar load factor of 11% refers to the actual level of electricity output over the course of a year in comparison to the maximum possible output by the panels. This is dependent on such factors as weather and hours of daylight over the course of the year.
			Some comments refer to the generation figures provided by the developer being misleading.	<p><b>7.11 Statement of Need</b> Figure 10.2 <b>[APP-320]</b> shows that many solar cell cells are over 20% efficient and some are within reach of 30% efficiency, meaning that more low-carbon electricity can be generated from the same area of land as was previously possible.</p> <p>Table 7.1 <b>[APP-320]</b> shows the electricity generated per Ha by different low-carbon technologies. At the UK's average solar load factor (11%), solar generation produces much more energy per Ha than biogas, and generates a similar amount of energy as onshore wind.</p> <p>It is the Applicant's view (and this aligns with Government's view) that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
			<p>Some comments refer to the inefficiency of other green energy technologies, and claim this will be the same for solar and this Scheme.</p>	<p>Table 7.1 of <b>7.11 Statement of Need [APP-320]</b> shows the electricity generated per hectare by different low-carbon technologies. At the UK's average solar load factor (11%), solar generation produces much more energy per hectare than biogas, and generates a similar amount of energy as onshore wind.</p>
			<p>Some comments refer to a sacrifice the community is having to make due to the unpredictable behaviour of solar generation.</p>	<p>The Applicant notes this comment and is cognisant that the operational lifetime of the Scheme will be felt as substantial to those living in the surrounding area. the assessments within the <b>Environmental Statement [APP-039 to APP-061]</b> assess the effects of the Scheme throughout its operational lifetime. Furthermore, the mitigation and enhancement measures set out in the ES and secured through the relevant control documents will be in place for the lifetime of the Scheme. This therefore means that enhancement measures that form part of the Scheme will also be in place for at least the assessed operational lifetime. These enhancement measures include:</p> <ul style="list-style-type: none"> <li>• Enhancements to local employment and to qualification and skills attainment (please refer to <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b> and <b>7.10 Outline Skills Supply Chain and Employment Plan [APP-319]</b>);</li> </ul>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<ul style="list-style-type: none"> <li>• Enhancements to recreational walking as a result of a new permissive path (please refer to <b>6.2.4 Environmental Statement - Chapter 4 Scheme Description [APP-042]</b> and <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b>);</li> <li>• Biodiversity Net Gain (please refer to <b>6.2.9 Environmental Statement - Chapter 9 Ecology and Biodiversity [APP-047]</b> and <b>6.3.9.12 Environmental Statement - Appendix 9.12 Biodiversity Net Gain Report [APP-088]</b>);</li> <li>• Landscape and ecological enhancements (please refer to <b>6.4.8.18.1_A-6.4.8.18.3_A Environmental Statement – Figures 8.18.1 to 8.18.3 – Landscape and Ecology Mitigation and Enhancement Measures [WB6.4.8.18.1_A to WB6.4.8.18.3_A]</b> and <b>7.3-A Outline Landscape and Ecological Management Plan [EN010132/EX1/WB7.3_A]</b>); and</li> <li>• Community Benefit Fund (refer to paragraph 4.8.1 of <b>7.5 Planning Statement [APP-313]</b>) (it is noted that this does not form part of the Scheme, but is being delivered as a separate commitment by the Applicant).</li> </ul> <p>The environmental benefits from the Scheme as identified in the Environmental Statement, its appendices, and other documents supporting the DCO</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				Application, are secured by the requirements as set out in Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> .
ALT-03	RR-303	Appropriateness of use of "greenfield" land	Comment that just because the fields are available does not mean that solar PV is appropriate. Comment goes on to compare appropriateness to that of air source heat pumps, in that they are not appropriate for draughty older houses with poor insulation, but are appropriate for modern houses built to modern standards with good insulation and good air tightness because they only provide a moderate level of background heat.	<p>Paragraph 8.9.15 of <b>7.11 Statement of Need [APP-320]</b> states that the bringing forward electricity into home heating, and supporting the rollout of electric vehicles as part of Government's electric vehicle infrastructure strategy, will increase demand for electricity in future years.</p> <p>Section 3.3 of document <b>7.11 Statement of Need [APP-320]</b>, specifically paragraphs 3.3.2, 3.3.5 and 3.3.11, describes the Government's view that large capacities of low-carbon generation will be required to meet that increased demand and replace output from retiring (fossil fuel) plants, and that "<i>a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar</i>". This support for large scale solar as part of the 'answer' to net zero and energy security has been repeated in the draft national policy statements EN-1 and EN-3, published in March 2023.</p> <p>Section 7.5 of <b>7.11 Statement of Need [APP-320]</b> describes how suitable locations for large-scale solar</p>



Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p>are identified and assessed. Paragraph 7.5.2 outlines the broad criteria for determining Site suitability.</p> <p>Figure 7.4 shows the level of photovoltaic power potential at the proposed locations for the Scheme. Section 9 describes the advantages of connecting large-scale solar to the existing and robust National Electricity Transmission System at the proposed Point of Connection at West Burton Power Station, and Paragraph 9.4.4 concludes that the Scheme will contribute to national system adequacy and decarbonisation targets.</p> <p><b>6.2.5 Environmental Statement - Chapter 5 Alternatives and Design Evolution [APP-043]</b> and its accompanying appendix <b>6.3.5.1_A Environmental Statement - Appendix 5.1 Site Selection Assessment Revision A [AS-004]</b> explain how the Scheme Sites were chosen in light of that need.</p> <p>Specifically, paragraph 2.1.10 of <b>6.3.5.1_A Environmental Statement - Appendix 5.1 Site Selection Assessment Revision A [AS-004]</b> explains the reasons why sites of the size proposed are required to meet the 480MW grid connection offer. The methodology used for the site selection process is considered reasonable and proportionate and complies with the requirements of NPS EN-1 4.4.3, as explained at Section 2.1 <b>[AS-004]</b>.</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
ALT-04	RR-277	Location of Substation	Question regarding the feasibility of the substation being placed underground.	Underground substations have been developed as a solution where above ground space is limited e.g. in city centres. It is not considered a cost-effective solution for the Scheme, nor do the assessments as set out in the <b>Environmental Statement [APP-039 to APP-061]</b> show that this would be required to mitigate significant environmental effects arising from the siting of the substations on the Scheme. As such, underground substations have not been considered as part of the Scheme and are not part of the application.
ALT-05	RR-135	West Burton 2	Concern that West Burton 2 is too close to Saxilby and the site should be moved away from residential areas.	<b>6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> (the 'LVIA') takes into account the effects on residential receptors and this includes singular buildings, groups of buildings and towns or villages. Table 8.20 of the LVIA sets out the selection of initial residential receptors for the purpose of the assessment, the reason for their selection being that the receptors are all within the 2km Study Area for the Scheme and the 0.5km Study Area from the outer boundary of the Cable Route Corridor. This assessment has included residential areas in Saxilby.  The visual effects are set out in <b>6.3.8.3 Environmental Statement - Appendix 8.3 Assessment of Potential Visual Effects [APP-074]</b> , which shows that some effects on visual receptors would be <b>significant</b>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p><b>adverse</b> at construction and year 1 of operation, but with mitigation this is reduced across the majority of the landscape receptors to <b>not significant</b> at year 15 of operation.</p> <p>Public vantage points from in and around the villages and residential areas are also considered within the LVIA, for example viewpoints VP01 and VP08 associated with the settlement of Broxholme, VP18 and VP28 the settlement of Ingleby and VP21, VP22 and VP23 with the settlement of Saxilby. These public vantage points are shown on <b>6.4.8.12.1-A – 6.4.8.12.3-A Environmental Statement - Figures 8.12.1-A to 8.12.3-A [APP-190 to APP-192]</b>.</p> <p>With regard to other views, Table 8.76 of the LVIA [<b>APP-046</b>] notes in respect to Viewpoints VP18 and VP28 and Transport Receptor T009 that “<i>Views of open arable farmland to the north of Saxilby would remain reinforcing the rural location of this settlement</i>”.</p> <p>The landscape mitigation measures are shown on <b>EN010132/EX1/WB6.4.8.18.1_A</b>- to <b>EN010132/EX1/WB6.4.8.18.3_A</b> Figures 8.18.1-A to 8.18.3-A Landscape and Ecology Mitigation and Enhancement Plans [<b>WB6.4.8.18.1_A to WB6.4.8.18.3_A</b>].</p> <p>Please also refer to EN010132/EX1/WB7.3-A <b>Outline Landscape and Ecological Management Plan</b></p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<b>[EN010132/EX1/WB7.3_A]</b> which is secured by Requirement 7 in Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> .
ALT-06	RR-088	Routing of Grid Connection Cable	Comment refers to cable route causing the loss of use of fields for holding pregnant mares and for producing grass and hay for feeding horses	The Applicant notes this comment and has identified that the West Burton Solar Project does not impact directly upon the commenter's land. Agricultural land will not be permanently lost to the proposed Scheme, and agricultural production can be maintained through its operational phase through.

### 3.3 Climate Change

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
CLI-01	RR-340	Carbon Capture	Concern that there will be a loss of carbon capture due to the Scheme.	<p>The Applicant is unclear as to what it is the Party is alluding to. The Applicant assumes the party is referring to an assumed loss of plants, vegetation and temporary loss of crop growing capabilities (as facilitators of carbon capture).</p> <p>In any case, the reversion from intensive agriculture to pasture or meadow grassland with additional hedgerow, scrub, tree and wetland habitat creation will bring about positive effects for carbon capture.</p> <p>A substantial net gain for biodiversity is anticipated to be achieved (see <b>6.3.9.12 Environmental Statement - Appendix 9.12 Biodiversity Net Gain Report [APP-088]</b>), predominantly through the creation of extensive low-input grassland resulting in a net gain of 86.80% in habitat units, but also several new ponds and wetland habitat parcels resulting in a net gain of 33.25% in river units, and the planting of several kilometres of species-rich hedgerow resulting in a net gain of 54.71% in hedgerow units.</p>

### 3.4 Cultural Heritage

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
CUL-01	RR-019; RR-021; RR-075; RR-082; RR-130; RR-133; RR-156; RR-165; RR-202; RR-244; RR-247; RR-306	Heritage loss	Concern that cultural and historical heritage will be lost.	<p><b>6.3.13.5 Environmental Statement - Appendix 13.5 Heritage Statement [APP-117 to APP-119]</b>, provides a detailed assessment of all Grade II Listed Buildings and Conservation Areas within 2km of the Scheme, and all Grade I and II* Listed Buildings and Scheduled Monuments within a 5km study area surrounding the Scheme. <b>6.2.13 Environmental Statement - Chapter 13 Cultural Heritage [APP-051]</b> (see paragraphs. 13.5.11 to 13.5.22, 13.7.23 to 13.7.26, 13.7.45 to 13.7.46 and 13.8.5 to 13.8.8) provides further detailed assessment of the predicted impacts upon the historic built environment. The assessment identifies that there would be negligible to minor adverse (i.e. not significant) impacts to the settings of nine Listed Buildings during the construction phase: <i>Negligible Adverse</i> impacts were identified at four Grade II Listed Buildings, potential for <i>Minor Adverse</i> impacts at four Grade II Listed buildings and one Grade I Listed building resulting in <i>Slight Adverse</i> effects. During the operational phase, there would be impacts to the settings of nine Listed Buildings, two of which were scored as effects of <i>Neutral</i> significance, whilst three were scored as <i>Slight Adverse</i>. In addition to this, it was concluded that there would be impacts of <i>Minor Adverse</i></p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p>magnitude at four Grade II Listed Buildings and one Grade II* Listed Building, all of which would result in effects of <i>Slight Adverse</i> significance, i.e., 'not significant' in EIA terms.</p> <p><b>6.2.13 Environmental Statement - Chapter 13 Cultural Heritage [APP-051]</b> also provides an assessment of potential impacts caused by the Scheme upon archaeological remains and Historic Landscape Character (HLC).</p> <p>Assessment works <b>[APP-051]</b> have identified numerous new archaeological sites and have greatly enhanced the archaeological and historic record. During the field evaluation it was identified that ploughing was causing a high level of destruction to archaeological deposits. Consequently, the Applicant considers that the Scheme will provide an opportunity to protect archaeological remains that are currently at risk of destruction from agricultural activity (Paragraphs 13.7.43 and 13.7.44 <b>[APP-051]</b>).</p> <p><b>6.3.13.7 Environmental Statement - Appendix 13.7 Archaeological Mitigation WSI</b> (Written Scheme of Investigation) <b>[APP-122]</b> details the mitigation proposed by the Applicant, enabling a mechanism for archaeological remains to be recorded or preserved in situ. This WSI is secured in Requirement 12 of Schedule</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p>2 to the <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p>
			<p>Some comments refer to the proximity of the site to a scheduled monument.</p>	<p><b>6.3.13.5 Environmental Statement - Appendix 13.5 Heritage Statement [APP-117 to APP-119]</b>, provides a detailed assessment of all Grade II Listed Buildings and Conservation Areas within 2km of the Scheme, and all Grade I and II* Listed Buildings and Scheduled Monuments within a 5km study area surrounding the Scheme.</p>
			<p>Some comments refer to a cultural heritage site near or on the site of West Burton 3. This is: Medieval Bishop's Palace and Deer Park. List Entry Number: 1019229.</p>	<p>As stated in Paragraph 3.3.34 of the Heritage Statement (<b>6.3.13.5 Environmental Statement - Appendix 13.5 Heritage Statement [APP-117 to APP-119]</b>), the Applicant acknowledges that the Scheme has the potential to physically and visually isolate the three Scheduled areas that make up the medieval bishop's palace and deer park Scheduled Monument (NHLE 1019229). However as identified in Paragraph 3.3.35 of the Heritage Statement [<b>APP-117 to APP-119</b>], the Applicant believes that the relationship between the three surviving components of the deer park has already been adversely compromised. Modern activity including the ex MOD petroleum storage facility and a railway line completely bisect the deer park, resulting in there being no intervisibility between the west park pale, and the Bishop's Palace and east park pale. While intervisibility exists between the Bishop's Palace and</p>



Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p>the east park pale, their historical relationship can only be experienced through the fossilisation of the parkland boundary by later mature trees and hedgerow. Conversely although this intervisibility exists, the Applicant highlights that the overall legibility of the northern section of the deer park is problematic. Desk-based research has demonstrated that there are several possibilities for the locations of the pales in the north of the deer park, which would have each joined the east and west park pales to the Bishop's Palace (Paragraphs 3.2.27-3.2.48 <b>[APP-117 to APP-119]</b>).</p>
			<p>Some comments refer to Gate Burton Hall and the Chateau as particular sites of historic value.</p>	<p>Burton Chateau (NHLE 1064085) and Gate Burton Hall (NHLE 1359458) are both Grade II* listed buildings located within the 5km study area surrounding the Scheme as identified in Table 13.15 of <b>6.2.13 Environmental Statement - Chapter 13 Cultural Heritage [APP-051]</b>. Due to their separation from the Scheme and intervening screening, both assets were scoped out of further consideration (para. 3.1.56 and 3.1.76 of <b>6.3.13.5 Environmental Statement - Appendix 13.5 Heritage Statement [APP-117]</b>).</p>

### 3.5 Ecology and Biodiversity

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
ECO-01	RR-004; RR-005; RR-007; RR-010; RR-015; RR-017; RR-019; RR-021; RR-022; RR-023; RR-024; RR-025; RR-027; RR-040; RR-044; RR-053; RR-055; RR-056; RR-059; RR-061; RR-063; RR-064; RR-067; RR-068; RR-069; RR-070; RR-071; RR-072; RR-075; RR-079; RR-081; RR-083; RR-084; RR-088; RR-095; RR-097; RR-100; RR-102; RR-103; RR-106; RR-113; RR-114; RR-115; RR-116; RR-117; RR-118; RR-120; RR-121; RR-124; RR-125; RR-128; RR-131; RR-132; RR-139; RR-141; RR-142; RR-148; RR-150; RR-153; RR-156; RR-158; RR-159; RR-160; RR-162; RR-163; RR-166; RR-169; RR-171; RR-174;	Ecology	Comments that the Scheme will detrimentally impact local biodiversity, wildlife, habitats and ecosystems.	<p>Section 9.7 of <b>6.2.9 Environmental Statement - Chapter 9 Ecology and Biodiversity [APP-047]</b> sets out the extensive findings of all ecological investigations undertaken within the Order Limits together with an appraisal of the relative importance of each species or species group, habitat or designated site. This survey scope has been formulated through consultation with Natural England as well as Lincolnshire and Nottinghamshire Wildlife Trusts and has deemed to be thorough and appropriate (see <b>6.3.9.1 Environmental Statement - Appendix 9.1 Consultation Responses [APP-077]</b>).</p> <p>A comprehensive package of mitigation has been provided, in tandem with embedded mitigation (see Section 9.6 which sets out the details of the embedded mitigation which has been incorporated into the ecologically sensitive design of the Scheme, such as the wide buffering of all field boundaries and the use of existing hedgerow gaps for accesses).</p> <p>These additional mitigation measures are further detailed within <b>7.17 Outline Ecological Protection and Mitigation Strategy [APP-326]</b> and <b>7.3_A Outline Landscape and Ecological Management Plan</b></p>

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	RR-175; RR-176; RR-182; RR-183; RR-184; RR-186; RR-187; RR-189; RR-190; RR-193; RR-194; RR-195; RR-196; RR-197; RR-198; RR-202; RR-204; RR-205; RR-206; RR-207; RR-208; RR-209; RR-210; RR-211; RR-214; RR-217; RR-218; RR-220; RR-222; RR-227; RR-229; RR-235; RR-237; RR-239; RR-240; RR-246; RR-247; RR-248; RR-252; RR-253; RR-254; RR-255; RR-256; RR-257; RR-258; RR-262; RR-263; RR-264; RR-268; RR-269; RR-270; RR-271; RR-274; RR-275; RR-277; RR-278; RR-280; RR-286; RR-287; RR-288; RR-290; RR-292; RR-301; RR-302; RR-303; RR-304; RR-305; RR-306; RR-312; RR-314; RR-315; RR-316; RR-317; RR-318; RR-319; RR-327; RR-329; RR-336;			<p><b>[EN010132/EX1/WB7.3_A]</b> which will ensure that all identified impacts are minimised as far as possible. This is secured through Requirement 7 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p> <p>In many cases, the reversion from intensive agriculture to pasture or meadow grassland with additional hedgerow, scrub, tree and wetland habitat creation will bring about beneficial effects for wildlife. In particular, terrestrial and aquatic invertebrates, botanical diversity, small mammals and many species of bird all stand to benefit.</p> <p>In this way, a substantial net gain for biodiversity is anticipated to be achieved (see <b>6.3.9.12 Environmental Statement - Appendix 9.12 Biodiversity Net Gain Report [APP-088]</b>), predominantly through the creation of extensive low-input grassland resulting in a net gain of 86.80% in habitat units, but also several new ponds and wetland habitat parcels resulting in a net gain of 33.25% in river units, and the planting of several kilometres of species-rich hedgerow resulting in a net gain of 54.71% in hedgerow units.</p> <p>Requirement 9 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> provides that "No part of the authorised development may commence until a</p>

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	RR-337; RR-339; RR-340; RR-343; RR-345		<p>Some comments refer to hares, deer, birds of prey etc. as wildlife that will be affected by the Scheme.</p>	<p>biodiversity net gain strategy has been submitted to and approved by the relevant planning authority, in consultation with the relevant statutory nature conservation body."</p> <p>Section 9.7 of <b>6.2.9 Environmental Statement - Chapter 9 Ecology and Biodiversity [APP-047]</b> sets out the extensive findings of all ecological investigations undertaken within the Order Limits together with an appraisal of the relative importance of each species or species group, habitat or designated site.</p> <p>In many cases, the reversion from intensive agriculture to pasture or meadow grassland with additional hedgerow, scrub, tree and wetland habitat creation will bring about beneficial effects for wildlife. In particular, terrestrial and aquatic invertebrates, botanical diversity, small mammals and many species of bird all stand to benefit.</p> <p>In the Applicant's consultant's experience of monitoring over 100 active solar arrays, the findings are that brown hare are highly active on solar arrays owing to the improved foraging habitat within them.</p> <p>An impact on the movement of deer is likely (see bullet point 9 within paragraph 9.6.5 of <b>6.2.9 Environmental Statement - Chapter 9: Ecology and Biodiversity [APP-047]</b>), although it is acknowledged from the ecological monitoring of numerous active solar</p>

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				<p>schemes that deer are regularly noted within the fenced areas having exploited locations of undulating terrain and other opportunities for entry. The reversion from intensive agriculture to pasture or meadow grassland with additional hedgerow, scrub, tree and wetland habitat creation will likely improve habitat for deer.</p> <p>Birds of prey, including owls, are one species group likely to benefit from the provision of large areas of optimal habitat for small mammals such as field voles which require tussocky and dense grassland which will be created within buffered field boundaries.</p>
			<p>Some comments refer to a negative impact towards endangered species in the local area.</p>	<p>Section 9.7 of <b>6.2.9 Environmental Statement - Chapter 9 Ecology and Biodiversity [APP-047]</b> sets out the extensive findings of all ecological investigations undertaken within the Order Limits together with an appraisal of the relative importance of each species or species group, habitat or designated site. This survey scope has been formulated through consultation with Natural England as well as Lincolnshire and Nottinghamshire Wildlife Trusts and has deemed to be thorough and appropriate (see <b>6.3.9.1 Environmental Statement - Appendix 9.1 Consultation Responses [APP-077]</b>).</p> <p>A comprehensive package of mitigation has been provided, in tandem with embedded mitigation (see</p>

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				<p>Section 9.6 which sets out the details of the embedded mitigation which has been incorporated into the ecologically sensitive design of the Scheme, such as the wide buffering of all field boundaries and the use of existing hedgerow gaps for accesses).</p> <p>These additional mitigation measures are further detailed within <b>7.17 Outline Ecological Protection and Mitigation Strategy [APP-326]</b> and <b>7.3_A Outline Landscape and Ecological Management Plan [EN010132/EX1/WB7.3_A]</b> which will ensure that all identified impacts are minimised as far as possible. These two management documents are secured through Requirements 8 and 7 respectively of Schedule 2 to <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p>
			<p>Some comments state that wildlife will be more restricted due to the fencing required for the Scheme.</p>	<p>The majority of animal species will be able to freely move through the operational Sites and the boundary fencing in the same way as they are currently able to in other locations where deer fencing is used. An impact on the movement of deer is likely (see bullet point 9 within paragraph 9.6.5 of <b>6.2.9 Environmental Statement - Chapter 9: Ecology and Biodiversity [APP-047]</b>), although it is acknowledged from the ecological monitoring of numerous active solar schemes that deer are regularly noted within the</p>

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				<p>fenced areas having exploited locations of undulating terrain and other opportunities for entry.</p> <p>The details of fencing and other means of enclosure are secured through Requirement 10 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> where it is stated that <i>"No part of the authorised development may commence until written details of all proposed temporary fences, walls or other means of enclosure, including those set out in the construction environmental management plan, for that part have been submitted to and approved by the relevant planning authority or, where the part falls within the administrative areas of multiple relevant planning authorities, each of the relevant planning authorities."</i></p>
			<p>Some comments refer to concern regarding the loss of hedgerows, as well as the importance/benefits of hedgerows to wildlife and human activity. Some comments referring to a loss of hedgerows cite a statistic of 55km of hedgerows being lost, and include requests for hedgerows to be protected as a condition of planning.</p>	<p>The Applicant is aware of the landscape, ecological, and heritage importance of hedgerows, and as such, the importance of these hedgerows is set out in <b>2.9 Important Hedgerows Plan [APP-014]</b>. Schedule 13 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> seeks powers of removal of hedgerows over the extents referred to in the relevant representation responses. However, the Applicant seeks to assure these parties that there is no intention for the removal of the entirety of the extents referenced. The reason for the inclusion of this power in the draft DCO is to include the extent of any</p>

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			<p>Some comments refer to the removal of hedgerows as contradictory to government policy on planting new hedgerows.</p>	<p>hedgerow that <i>may</i> need to be removed, where the exact location of the removal has not yet been determined and will be identified as part of the detailed design if the DCO is granted. For example, where existing accesses do not exist, some very minor hedgerow removal is necessary to accommodate access roads between fields, land parcels and solar panel areas. The approximate location and extent of this removal is set out in <b>Hedgerow Removal Plans [EN010132/EX1/WB7.3_A]</b>, which demonstrates that a far smaller amount of hedgerow removal (both temporary and permanent) will take place as part of the Scheme as compared with the extent of the power included in article 38 and Schedule 13 to the Draft DCO <b>[EN010132/EX1/WB3.1_A]</b>. This removal will involve only very short sections of hedgerow to accommodate internal access roads and will not involve loss of trees, in particular trees protected under any Tree Preservation Orders (TPOs). This will be secured at detailed design, and secured through the Landscape and Ecological Management Plan required by Requirement 7 of Schedule 2 to <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p> <p>A substantial net gain for biodiversity is anticipated to be achieved (see <b>6.3.9.12 Environmental Statement - Appendix 9.12 Biodiversity Net Gain Report [APP-</b></p>



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			<p>Some comments refer to research on migratory birds and the negative impact solar panels have on them.</p> <p>Some comments refer to alternative options for renewable energy, which do not affect wildlife or biodiversity, and that these should be prioritised instead of this Scheme.</p> <p>Some comments refer to statistics from wider sources detailing the loss of birdlife in the UK.</p>	<p><b>088</b>), including the planting of several kilometres of species-rich hedgerow resulting in a net gain of 54.71% in hedgerow units.</p> <p>The current guidance on this subject indicates that the risk posed to birds from solar panels is low, including the conclusions of a 2016 Natural England literature review (NEER012 – Evidence Review of the Impact of Solar Farms on Birds, Bats and General Ecology 2016). Furthermore, Natural England have responded in Section 42 consultation on the Scheme to confirm that impacts upon birds associated with the Humber Estuary SPA are unlikely (see pg.219-220 of <b>5.13 Consultation Report - Appendix 5.13 - Section 42 Applicant Response [APP-037]</b>).</p> <p>The Applicant is not aware of any glint and glare issues affecting local wildlife and captive animals. Solar reflections originating from solar panels will be similar to the one originating from a body of water. Therefore, effects upon animals are likely to be similar to those assessed in Appendix B of <b>6.3.16.1 Environmental Statement - Appendix 16.1 Solar Photovoltaic Glint and Glare Study [APP-132]</b>.</p> <p>Section 9.6 of <b>6.2.9 Environmental Statement - Chapter 9 Ecology and Biodiversity [APP-047]</b> sets out the extensive findings of all ecological investigations undertaken within the Order Limits together with an</p>

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				<p>appraisal of the relative importance of each species or species group, habitat or designated site. A comprehensive package of mitigation measures has been identified, in tandem with embedded mitigation (see Section 9.6) established through the ecologically sensitive design of the Scheme (such as the wide buffering of all field boundaries and the use of existing hedgerow gaps for accesses). These measures have been further detailed within <b>7.17 Outline Ecological Protection and Mitigation Strategy [APP-326]</b> and <b>7.3_A Outline Landscape and Ecological Management Plan [EN010132/EX1/WB7.3_A]</b> which will ensure that all identified impacts are minimised as far as possible. In many cases, the reversion from intensive agriculture to pasture or meadow grassland with additional hedgerow, scrub, tree and wetland habitat creation will bring about positive effects for wildlife. In particular, terrestrial and aquatic invertebrates, botanical diversity, small mammals and many species of bird all stand to benefit. These two management documents are secured through Requirements 8 and 7 respectively of Schedule 2 to <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p> <p>In the Applicant's consultant's experience of monitoring over 100 active solar arrays, birds of prey, including owls, are one species group likely to benefit from the</p>

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				<p>provision of large areas of optimal habitat for small mammals such as field voles which require tussocky and dense grassland which will be created within buffered field boundaries.</p>
			<p>Some comments refer to the loss of the hawthorn hedge, which provides good habitat for birds.</p>	<p>Some very minor hedgerow removal is necessary to accommodate access roads between fields, land parcels and solar panel areas. The approximate location and extent of this removal is set out in <b>Hedgerow Removal Plans [EN010132/EX1/WB7.3_A]</b>. This removal will involve only very short sections of hedgerow to accommodate internal access roads and will not involve loss of trees, in particular trees protected under any Tree Preservation Orders (TPOs). This will be secured at detailed design, and secured through the Landscape and Ecological Management Plan required by Requirement 7 of Schedule 2 to <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p> <p>Mitigation measures to ensure birds and other species are protected during the removal of sections of hedgerow are further detailed within the <b>7.17 Outline Ecological Protection and Mitigation Strategy [APP-326]</b></p> <p>A substantial net gain for biodiversity is anticipated to be achieved (see <b>6.3.9.12 Environmental Statement - Appendix 9.12 Biodiversity Net Gain Report [APP-</b></p>

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			<p>Some comments refer to wildlife mitigation taking 15 years to grow, meaning the first 15 years will see no mitigation.</p>	<p><b>088</b>), including the planting of several kilometres of species-rich hedgerow resulting in an overall net gain of 54.71% in hedgerow units.</p> <p>The LVIA Methodology (set out in <b>6.3.8.1 Environmental Statement - Appendix 8.1 LVIA Methodology [APP-072]</b>) that underpins the assessment places a reliance on planting to mitigate adverse effects setting out the three ways in which this mitigation has been approached (para. 1.1.34) being 'primary', 'secondary' and 'tertiary' mitigation. The methodology considers that 'secondary mitigation' measures will be established for Year 15 of the Scheme and that <i>"Assessing the impacts of the Scheme at Year 15 is considered to be appropriate in the context of landscape character and visual amenity, since it is judged to be the most effective in terms of effectiveness of maturation of planting and the 'time depth' of the receiving landscape"</i>. These 'secondary' measures look to add inherent value to the landscape character and reduce visual impacts of the Scheme and its environs and to exceed planning policy expectations.</p> <p>Mitigation measures are also set out in 7.3_A Outline Landscape and Ecological Management Plan <b>[EN010132/EX1/WB7.3_A]</b> and they are secured through Requirement 7 in Schedule 2 of <b>3.1-A Draft Development Consent Order Revision A</b></p>

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				<p><b>[EN010132/EX1/WB3.1_A]</b> and will ensure that all identified impacts are minimised as far as possible on existing trees, hedgerows and other habitats.</p> <p>As part of the Biodiversity Net Gain calculations for the Scheme Sites, a temporal risk multiplier is automatically applied to all proposed habitat enhancement and creation. This represents the average time lag, measured in years, between the start of habitat creation or enhancement works and the target outcome. This is known known as 'time to target condition'. This multiplier is automatically applied by the metric and changes depending on data input. In this way, the calculations take into account any temporal losses of habitat function and biodiversity value.</p> <p>With the temporal risk multiplier applied, the Scheme has been calculated to achieve a substantial net gain for biodiversity is anticipated to be achieved (see <b>6.3.9.12 Environmental Statement - Appendix 9.12 Biodiversity Net Gain Report [APP-088]</b>).</p>
			<p>Some comments refer to the loss of key species in the food chain, for example predators and pollinators.</p>	<p>The vast majority of the footprint of the solar array within the Order Limits occupies intensive arable land with highly managed hedgerows and minimal field margins. At present, therefore, the majority of the land is of very limited value to pollinator invertebrate species and the species assemblage is likely to be of low abundance and diversity. The reversion of this arable</p>

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			<p>land almost entirely to low-input grassland managed sensitively to promote its species diversity and create a mosaic of tussocky or flowering grasslands will be of great benefit to the local pollinator species assemblage. This is discussed in more detail in paragraphs 9.7.185 to 9.7.195 of <b>6.2.9 Environmental Statement - Chapter 9 Ecology and Biodiversity [APP-047]</b>.</p> <p>In the Applicant's consultant's experience of monitoring over 100 active solar arrays, birds of prey, including owls, are one species group likely to benefit from the provision of large areas of optimal habitat for small mammals such as field voles which require tussocky and dense grassland which will be created within buffered field boundaries.</p>	<p>Some comments refer to the Biodiversity Net Gain Assessment as guesswork rather than facts.</p> <p><b>6.3.9.12 Environmental Statement - Appendix 9.12 Biodiversity Net Gain Report [APP-088]</b> sets out how a significant net gain for biodiversity has been calculated. Requirement 9 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> provides that <i>"No part of the authorised development may commence until a biodiversity net gain strategy has been submitted to and approved by the relevant planning authority, in consultation with the relevant statutory nature conservation body."</i></p>

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				The Biodiversity Net Gain assessment has been carried out using the Defra Biodiversity Metric which is a recognised method for determining the likely change in habitat value through development.
			Some comments refer to the lack of consideration for EMF frequencies on marine life.	Guidance for controlling levels of electromagnetic fields is restricted to the potential impacts on human health, and as such, effects on animal and plant life were not included as matters to be considered in Section 3.12 of <b>6.3.2.2 Environmental Statement - Appendix 2.2 EIA Scoping Opinion [APP-068]</b> , hence they have not been assessed in the ES. That notwithstanding, the EMF generated by the panels is very low level static fields as a result of their generation at 400V DC. The peak EMF generated by the Scheme is from the Shared Cable Route Corridor, where three 400kV circuits will run in parallel, which is detailed in para. 21.2.3 to 21.2.9 of <b>6.2.21 Environmental Statement - Chapter 21 Other Environmental Matters [APP-059]</b> . This is not likely to produce significant adverse effects to marine life. Assessment of the impacts from EMF were scoped out of the Environmental Statement on this basis (see Section 3.12 of <b>6.3.2.2 Environmental Statement - Appendix 2.2 EIA Scoping Opinion [APP-068]</b> ).
			Some comments refer to the construction period amplifying wildlife destruction.	A comprehensive package of mitigation has been provided, in tandem with embedded mitigation (see Section 9.6 of <b>6.2.9 Environmental Statement -</b>

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				<p><b>Chapter 9 Ecology and Biodiversity [APP-047]</b> sets out the details of the embedded mitigation which has been incorporated into the ecologically sensitive design of the Scheme, such as the wide buffering of all field boundaries and the use of existing hedgerow gaps for accesses).</p> <p>These additional mitigation measures are further detailed within <b>7.17 Outline Ecological Protection and Mitigation Strategy [APP-326]</b> and <b>7.3_A Outline Landscape and Ecological Management Plan [EN010132/EX1/WB7.3_A]</b> (as secured by Requirement 8 and Requirement 7 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> which will ensure that all identified impacts are minimised as far as possible.</p> <p>Mitigation and enhancement measures to avoid or reduce construction impacts are set out in <b>7.1_A Outline Construction Environmental Management Plan Revision A [EN010132/EX1/WB7.1_A]</b>, which is secured through Requirement 13 in Schedule 2 to <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p>
			Some comments refer to animals such as deer being displaced by the Scheme and forced to go	An impact on the movement of deer is likely (see bullet point 9 within paragraph 9.6.5 of <b>6.2.9 Environmental Statement -Chapter 9 Ecology and Biodiversity [APP-047]</b> ), although it is acknowledged from the ecological



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			elsewhere and being likely to cause road traffic accidents.	<p>monitoring of numerous active solar schemes that deer are regularly noted within the fenced areas having exploited locations of undulating terrain and other opportunities for entry.</p> <p>The details of fencing and other means of enclosure are secured through Requirement 10 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> where it is stated that <i>"No part of the authorised development may commence until written details of all proposed temporary fences, walls or other means of enclosure, including those set out in the construction environmental management plan, for that part have been submitted to and approved by the relevant planning authority or, where the part falls within the administrative areas of multiple relevant planning authorities, each of the relevant planning authorities."</i></p>
			Some comments refer to animals around the moat being disturbed by the Scheme.	<p>No specific location details have been provided on the moat but the Applicants answer is based on this meaning the moat which forms part of the medieval bishops palace and deer park at Stow Park. Section 9.7 of <b>6.2.9 Environmental Statement - Chapter 9 Ecology and Biodiversity [APP-047]</b> sets out the extensive findings of all ecological investigations undertaken within the Order Limits together with an appraisal of the relative importance of each species or species group, habitat or designated site. This survey</p>

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				<p>scope has been formulated through consultation with Natural England as well as Lincolnshire and Nottinghamshire Wildlife Trusts and has deemed to be thorough and appropriate (see <b>6.3.9.1 Environmental Statement - Appendix 9.1 Consultation Responses [APP-077]</b>).</p> <p>A comprehensive package of mitigation has been provided, in tandem with embedded mitigation (see Section 9.6 which sets out the details of the embedded mitigation which has been incorporated into the ecologically sensitive design of the Scheme, such as the wide buffering of all field boundaries and the use of existing hedgerow gaps for accesses).</p> <p>These additional mitigation measures are further detailed within <b>7.17 Outline Ecological Protection and Mitigation Strategy [APP-326]</b> and <b>7.3_A Outline Landscape and Ecological Management Plan [EN010132/EX1/WB7.3_A]</b> which will ensure that all identified impacts are minimised as far as possible. These two management documents are secured through Requirements 8 and 7 respectively of Schedule 2 to <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p> <p>The habitats and associated species within the Bishop's Palace will be protected during the construction phase according to the measures set out within the EPMS</p>

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				<p>[APP-326] and the woodland and wetland habitats in this area will be buffered by at least 20m from the solar array.</p>
			<p>Some comments refer to a loss of fauna and flora.</p>	<p>In many cases, the reversion from intensive agriculture to pasture or meadow grassland with additional hedgerow, scrub, tree and wetland habitat creation will bring about beneficial effects for wildlife. In particular, terrestrial and aquatic invertebrates, botanical diversity, small mammals and many species of bird all stand to benefit.</p> <p>In this way, a substantial net gain for biodiversity is anticipated to be achieved (see <b>6.3.9.12 Environmental Statement - Appendix 9.12 Biodiversity Net Gain Report [APP-088]</b>), predominantly through the creation of extensive low-input grassland resulting in a net gain of 86.80% in habitat units, but also several new ponds and wetland habitat parcels resulting in a net gain of 33.25% in river units, and the planting of several kilometres of species-rich hedgerow resulting in a net gain of 54.71% in hedgerow units.</p> <p>Requirement 9 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> provides that <i>"No part of the authorised development may commence until a biodiversity net gain strategy has been submitted to and approved by the relevant planning authority, in</i></p>

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				<i>consultation with the relevant statutory nature conservation body."</i>
			Some comments refer to inadequate provision for wildlife.	The landscape proposals for the Scheme are set out within the <b>7.3_A Outline Landscape and Ecological Management Plan Revision A [EN010132/EX1/WB7.3_A]</b> and include 7.1km of newly planted native hedgerow, 13.7ha of native shelter belt / woodland and existing hedgerows being reinforced with native planting. This will improve habitat connectivity within the Order Limits for a range of species. This is secured through Requirement 7 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> .
			Some comments refer to spotting Montagu's harrier from footpaths in this area and that the Scheme will detrimentally impact this species.	Montagu's harrier are a scarce passage migrant bird and summer visitor to Lincolnshire with irregular breeding occurring within the county. No sightings of Montagu's harrier were recorded during the breeding bird surveys as set out in <b>6.3.9.8 Environmental Statement - Appendix 9.8 - Breeding Bird Survey Report [APP-084]</b> and is not thought that this species breeds within the Order Limits.  In terms of foraging habitat, it is not considered that the Scheme will have a significant impact on this species. In the Applicant's consultant's experience of monitoring over 100 active solar arrays, the findings regularly result in observations of hunting barn owls, sparrowhawk,

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				<p>kestrel, buzzard and other birds of prey. The presence of the panel structures themselves is therefore not considered to be a significant impediment to hunting, and species such as owls and sparrowhawk thrive within orchard environments which have a similar 3D structure. As set out in <b>6.2.9 Environmental Statement - Chapter 9 Ecology and Biodiversity [APP-047]</b>, the reversion from arable to low-input grassland will result in a significantly more optimal habitat for the proliferation of small mammals such as field voles which make up a large proportion of the diet of many birds of prey, including Montagu's harrier. Similarly, the creation of tussocky, or flower rich marginal habitats within buffer zones which will be far wider than the present arable field margins will bring about improved habitat for seed-eating passerine birds as well as invertebrates such as dragonflies. In turn, raptor species such as kestrel, hobby and sparrowhawk all stand to benefit.</p>
			<p>Some comments refer to herbicide sprays being used to keep infrastructure maintained, but at the expense of wildlife that will be forced away and cannot recolonise.</p>	<p>Herbicide sprays are routinely used on arable land, and as such the cessation of arable use will reduce the requirement for herbicides. The use of herbicides on the Scheme is controlled through <b>7.3_A Outline Landscape and Ecological Management Plan Revision A [EN010132/EX1/WB7.3_A]</b> which in Section 4 states that herbicides are to be avoided, and only used in spot-treatments for high levels of injurious</p>

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				weeds, or where invasive non-native plant species cannot be hand-pulled. These measures as set out in the Outline LEMP are secured through Requirement 7 of Schedule 2 to <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> .
ECO-02	RR-082; RR-271	Mitigation	Concern that mitigation for the Scheme is limited or non-existent.	<p>Whilst it has not been possible for the Scheme to avoid all significant residual adverse impacts, these have been identified within <b>the Environmental Statement [APP-039 to APP-061]</b> and have been minimised, where possible, through careful and sensitive design and detailed mitigation strategies.</p> <p>Section 9.7 of <b>6.2.9 Environmental Statement – Chapter 9 Ecology and Biodiversity [APP-047]</b> sets out the extensive findings of all ecological investigations undertaken within the Order Limits together with an appraisal of the relative importance of each species or species group, habitat or designated site. A comprehensive package of mitigation measures has been identified, in tandem with embedded mitigation (see Section 9.6) established through the ecologically sensitive design of the Scheme (such as the wide buffering of all field boundaries and the use of existing hedgerow gaps for accesses). These measures are further detailed within <b>7.17 Outline Ecological Protection and Mitigation Strategy [APP-326]</b> and <b>7.3_A Outline Landscape and Ecological</b></p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p><b>Management Plan [EN010132/EX1/WB7.3_A]</b> (as secured by Requirement 8 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>) which will ensure that all identified impacts are minimised as far as possible. In many cases, the reversion from intensive agriculture to pasture or meadow grassland with additional hedgerow, scrub, tree and wetland habitat creation will bring about beneficial effects for wildlife. In particular, terrestrial and aquatic invertebrates, botanical diversity, small mammals and many species of bird all stand to benefit.</p>
ECO-03	RR-254	Photosynthesis	Concern that the Scheme will reduce photosynthesis greatly, CO2 uptake will also be reduced, which will result in a greater greenhouse effect.	<p>The Scheme is anticipated to result in a substantial net gain for biodiversity (see <b>6.3.9.12 Environmental Statement - Appendix 9.12 Biodiversity Net Gain Report [APP-088]</b>), predominantly through the creation of extensive low-input grassland resulting in an anticipated net gain of 86.80% in habitat units, but also several new ponds and wetland habitat parcels resulting in an anticipated net gain of 33.25% in river units, and the planting of several kilometres of species-rich hedgerow resulting in an anticipated net gain of 54.71% in hedgerow units.</p> <p>This will be secured through the management and ecological monitoring prescriptions contained within <b>7.3_A Outline Landscape and Ecological</b></p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p><b>Management Plan Revision A [EN010132/EX1/WB7.3_A]</b> as secured by Requirement 7 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p> <p>Invariably, such an increase in habitat, hedgerow and river units will result in an increase of oxygen generating plants.</p>
ECO-04	RR-262	Wildlife corridors	Concern that the BESS/ operating plant will shut off a large portion of area to wildlife.	<p>The Scheme is anticipated to result in a substantial net gain for biodiversity (see <b>6.3.9.12 Environmental Statement - Appendix 9.12 Biodiversity Net Gain Report [APP-088]</b>), predominantly through the creation of extensive low-input grassland resulting in a net gain of 96.09% in habitat units, but also several new ponds and wetland habitat parcels resulting in a net gain of 10.69% in river units, and the planting of several kilometres of species-rich hedgerow resulting in a net gain of 70.22% in hedgerow units.</p> <p>Requirement 9 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> provides that "No part of the authorised development may commence until a biodiversity net gain strategy has been submitted to and approved by the relevant planning authority, in consultation with the relevant statutory nature conservation body."</p>



Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p>Section 9.7 of <b>6.2.9 Environmental Statement - Chapter 9 Ecology and Biodiversity [APP-047]</b> sets out the extensive findings of all ecological investigations undertaken within the Order Limits together with an appraisal of the relative importance of each species or species group, habitat or designated site. A comprehensive package of mitigation measures has been identified, in tandem with embedded mitigation (see Section 9.7) established through the ecologically sensitive design of the Scheme (such as the wide buffering of all field boundaries and the use of existing hedgerow gaps for accesses). These measures are further detailed within <b>7.19 Outline Ecological Protection and Mitigation Strategy [APP-326]</b> (as secured by Requirement 8 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>) and <b>7.3_A Outline Landscape and Ecological Management Plan [EN010132/EX1/WB7.3_A]</b> (as secured by Requirement 7 of Schedule 2 to <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>) which will ensure that all identified impacts are minimised as far as possible. In many cases, the reversion from intensive agriculture to pasture or meadow grassland with additional hedgerow, scrub, tree and wetland habitat creation will bring about beneficial effects for wildlife. In particular, terrestrial and aquatic invertebrates,</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p>botanical diversity, small mammals and many species of bird all stand to benefit.</p> <p>More specifically, in the Applicant's consultant's experience of monitoring over 100 active solar arrays, the findings are that brown hare and badgers are highly active on solar arrays owing to the improved foraging habitat within them. Birds of prey, including owls, are one species group likely to benefit from the provision of large areas of optimal habitat for small mammals such as field voles which require tussocky and dense grassland which will be created within buffered field boundaries.</p> <p>Construction activities will be temporary, and since they are limited primarily to the piling of metal supports into the ground and laying of electrical cabling, they are not considered to create a level of disturbance which significantly exceeds that generated by typical agricultural sowing, spraying and harvesting operations. Please see Paragraphs 9.7.86 and 9.7.149 of <b>6.2.9 Environmental Statement - Chapter 9 Ecology and Biodiversity [APP-047]</b>.</p>

### 3.6 Energy Need

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
ENE-01	RR-003; RR-005; RR-021; RR-039; RR-062; RR-073; RR-075; RR-078; RR-080; RR-082; RR-095; RR-106; RR-107; RR-115; RR-119; RR-121; RR-126; RR-156; RR-160; RR-168; RR-186; RR-191; RR-205; RR-220; RR-257; RR-271; RR-272; RR-279; RR-285; RR-293; RR-303; RR-307; RR-334; RR-338; RR-339	Alternative sources of energy	<p>Comments on a perception that other sources of generating electricity are a better choice than Solar.</p> <p>Some comments refer to technical innovations within the green sector making solar a weak choice compared with other renewable energy technologies.</p> <p>Some comments refer to wind power as a suitable alternative.</p> <p>Some comments refer to tidal and wave power as a suitable alternative.</p> <p>Some comments refer to nuclear power as a suitable alternative.</p> <p>Some comments refer to continued use of coal fired power stations as a suitable alternative.</p> <p>Some comments refer to SMR (Small Modular Reactors) as a suitable alternative.</p>	<p><b>Chapter 4 of 7.11 Statement of Need [APP-320]</b> sets out the UK's legal requirement to decarbonise and explains how that requirement has created an increased need and urgency to meet the UK's obligations under the Paris Agreement (2015) as detailed within paragraph 4.2.7.</p> <p>The Chapter summarises the latest expert views on the urgency for, and amount of, low-carbon infrastructure needed to deliver the UK's Net Zero legal obligations and demonstrates that there is an urgent need for the development of large-scale solar schemes. Large-scale solar is especially relevant given the closure by 2028 of all but 1.2GW of existing nuclear power stations, and the closure by September 2024 of the last of the UK's operating coal fired power stations. The current and future UK electricity generation mix, and risks associated with technology developments, are analysed in Chapter 5 of <b>7.11 Statement of Need [APP-320]</b>.</p> <p>Both the 2021 and 2023 Draft Revised NPS EN-1 articulate the prudence of planning infrastructure development on a conservative basis to ensure that there is sufficient supply of electricity to meet demand across a wide range of future scenarios. Chapter 5 of <b>7.11 Statement of Need [APP-320]</b> describes the risks associated with the development of nuclear and Carbon</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p>Capture, Usage and Storage (CCUS) technology. This supports the Government's identification, included at Paragraph 3.3.8 of <b>7.11 Statement of Need [APP-320]</b>, "for sustained growth in the capacity of onshore wind and solar in the next decade" and further that a Net-Zero consistent [energy] system in 2050 "is likely to be composed predominantly of wind and solar" (Paragraph 3.3.7). This point is reiterated in the newly published March 2023 Draft Revised National Policy Statement EN-3. Figure 7.1 shows National Grid Electricity System Operator's projections of the capacity of solar generation required to deliver a net-zero consistent system, which, as stated in para. 7.2.10, are 25 – 42GW by 2030, and 57 – 92GW by 2050, compared to just 14GW today (Section 7.2).</p> <p>The consideration of alternatives has been undertaken within <b>6.2.5 Environmental Statement - Chapter 5 Alternatives and Design Evolution [APP-043]</b>. This includes the consideration of alternative sites (Section 5.5), alternative technologies (Section 5.6), alternative layouts (Section 5.7), alternative substation locations (section 5.8) and alternative cable routes (Section 5.9). <b>6.2.5 Environmental Statement - Chapter 5 Alternatives and Design Evolution [APP-043]</b> concludes in paragraphs 5.10.3, 5.10.4 and 5.10.5 that alternative potential development areas did not perform as well as the Sites.</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
			<p>Some comments refer to improving home energy efficiency as a suitable alternative</p> <p>Some comments refer to nuclear fusion, including at West Burton Power Station, as a suitable alternative.</p>	<p><b>7.11 Statement of Need [APP-320]</b> does not seek to justify or promote the exclusion of any generation (or home energy efficiency) technologies other than solar power from the future GB generation mix. But it does identify that within the context of an urgent need for large capacities of low-carbon generation, risks associated with long-lead time technologies cannot be ignored and therefore supports the Government's prudent approach to planning infrastructure on a conservative basis to ensure that there is sufficient supply of electricity to meet demand across a wide range of future scenarios, i.e. considering the possibility that long-lead time, currently unproven, unconsented or unfunded technologies are either delayed in delivery or cannot ultimately be delivered.</p>
ENE-02	RR-271	Electricity storage need	Concern that in summer when demand is lower there is currently only limited effective power storage available to harvest excess energy.	Section 3.3 of <b>7.11 Statement of Need [APP-320]</b> , specifically paragraphs 3.3.5 and 3.3.11, describe the Government's view that large capacities of low-carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that <i>"a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar"</i> . This support for large scale solar as part of the 'answer' to net zero and energy security has been repeated in the draft national policy statements EN-1 and EN-3, published in March 2023.

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p>Figure 7.1 <b>[APP-320]</b> shows National Grid Electricity System Operator's projections of the capacity of solar generation required to deliver a net-zero consistent system, which are 25 – 42GW by 2030, and 57 – 92GW by 2050, compared to just 14GW today, as stated in paragraph 7.2.10.</p> <p>Chapter 11 <b>[APP-320]</b> describes the need for flexibility to support the integration of renewable energy schemes into the national energy system, including electricity storage and hydrogen, among other technologies. Section 11.6 <b>[APP-320]</b> addresses relevant points in relation to projections of storage capacity in the UK.</p> <p>Paragraph 11.5.1 <b>[APP-350]</b> explains that the Scheme's grid connection agreement provides 20MW of import power capacity which explains the inclusion of 20MW (as opposed to a greater capacity) of electricity storage capability as part of the Scheme. The Applicant's inclusion of a battery energy storage facility which makes use of the available import power capacity from the Grid provides the capability to deliver flexibility as part of the Scheme.</p>

### 3.7 General Comments

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
GEN-01	RR-005; RR-010; RR-021; RR-022; RR-053; RR-066; RR-082; RR-088; RR-095; RR-098; RR-114; RR-152; RR-156; RR-161; RR-175; RR-194; RR-210; RR-222; RR-247; RR-278; RR-284	Consultation	<p>Belief that there has not been enough information presented or opportunities for discussion regarding the Scheme.</p> <p>Some comments refer to the Applicant team not being able to answer basic questions about the project.</p>	<p>The Applicant is confident that the level of consultation undertaken, and information presented throughout the pre-application stage was in accordance with the Planning Act 2008 and associated guidance. This has been evidenced in <b>5.1 Consultation Report [APP-022]</b>, which was submitted to the Planning Inspectorate and accepted for examination.</p>
			<p>Some comments refer to Scheme maps being too small or lacking detail.</p>	<p>The Applicant is confident that the plans ("maps") and information as a whole submitted to the Planning Inspectorate presents sufficient detail and is of sufficient size, as demonstrated by the Planning Inspectorate's decision to accept the Scheme for examination.</p>
			<p>Some comments refer to members of the public not having any knowledge of the Scheme at this point in the application process.</p> <p>Some comments suggest that the Applicant has disregarded the</p>	<p>The Applicant acknowledges this comment but is confident that the level of consultation undertaken, and information presented throughout the pre-application stage was in accordance with the Planning Act 2008 and associated guidance. This has been evidenced in <b>5.1 Consultation Report [APP-022]</b>, which was submitted to the Planning Inspectorate and accepted for examination.</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
			<p>community during the application process.</p> <p>Some comments refer to a lack of meetings in villages to discuss the impacts of the Scheme.</p>	<p>For example, as described in Chapter 2 <b>[APP-022]</b>, the Applicant undertook two phases of community consultation to share information and invite feedback at different stages of Scheme development.</p> <p>Chapter 7 <b>[APP-022]</b> describes the Applicant's approach to statutory consultation, including consulting with relevant authorities on a draft Statement of Community Consultation. Table 7.1 sets out the comments received from authorities on the Applicant's approach to consultation and how the Applicant has had regard to these in developing the Scheme. Table 7.3 in Chapter 7 describes how the Applicant complied with commitments made in the Statement of Community Consultation when undertaking statutory consultation.</p> <p>Chapter 8 <b>[APP-022]</b> describes how the Applicant undertook a six-week statutory phase two consultation on the Scheme, during which the Applicant presented consultees with environmental information sufficient for consultees to understand the potential likely significant effects of the Scheme in a Preliminary Environmental Impact Report (PEIR). A non-technical summary was published to accompany the PEIR, with public information events and free-to-use communications channels open to help aid accessibility and understanding of the Scheme. A Consultation Summary Report for this phase of statutory consultation was published on the dedicated Scheme</p>



Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
			<p>Some comments refer to documents such as the PEIR, and believe the information presented to the public was misleading.</p> <p>Some comments refer to perceived misleading facts and</p>	<p>website, shared with elected representatives and stakeholders and issued to over 9,000 properties within the vicinity of the Scheme, to help consultees understand how their feedback was being considered. A copy of the Phase Two Consultation Summary Report is provided at pp.36-43 of <b>5.7 Consultation Report - Appendix 5.7 Phase Two Community Consultation Materials - Part 3 of 3 [APP-031]</b>.</p> <p>Chapter 11 of <b>5.1 Consultation Report [APP-022]</b> describes the significant volume of responses received to Section 47 consultation (local community), including the issues raised and how the Applicant has had regard to these in developing the Scheme. This is further evidenced by <b>5.12 Consultation Report - Appendix 5.12 - Section 47 Applicant Response [APP-036]</b>.</p> <p>The host authorities have confirmed that the statutory consultation process was adequate <b>[AoC-001 to AoC-013]</b>.</p> <p>The Applicant acknowledges this comment but is confident that the level of consultation undertaken, and information presented throughout the pre-application stage was in accordance with the Planning Act 2008 and associated guidance. This has been evidenced in <b>5.1 Consultation Report [APP-022]</b>, which was submitted to the Planning Inspectorate and accepted for examination.</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
			<p>figures shown in consultation leaflets.</p> <p>Some comments refer to not having their feedback reported following targeted consultation on West Burton 3.</p>	<p>The Applicant acknowledges this comment but is confident that the level of consultation undertaken, and information presented throughout the pre-application stage was in accordance with the Planning Act 2008 and associated guidance. This has been evidenced in <b>5.1 Consultation Report [APP-022]</b>, which was submitted to the Planning Inspectorate and accepted for examination.</p> <p>Chapter 11 of <b>5.1 Consultation Report [APP-022]</b> describes the significant volume of responses received to Section 47 consultation (local community), including the issues raised and how the Applicant has had regard to these in developing the Scheme. This is further evidenced by <b>5.12 Consultation Report - Appendix 5.12 - Section 47 Applicant Response [APP-036]</b>. <b>Table 5.12.12</b> of this appendix details the responses received to Section 47 regarding targeted consultation on updated proposals for the West Burton 3 site area.</p> <p>Chapter 12 of <b>5.1 Consultation Report [APP-022]</b> describes the significant volume of responses received to Section 42 consultation (statutory consultees), including the issues raised and how the Applicant has had regard to these in developing the Scheme. <b>Table 5.13.2 of Consultation Report - Appendix 5.13-</b></p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p><b>Section 42 Applicant Response [APP-037]</b> details the responses received to consultation under Section 42 of the Planning Act 2008 regarding targeted consultation on updated proposals for the West Burton 3 site area.</p> <p>The host authorities have confirmed that the statutory consultation process was adequate <b>[AoC-001 to AoC-013]</b>.</p>
			<p>Some comments claim local businesses have not been consulted.</p> <p>Some comments claim local farmers/ landowners have not been consulted.</p>	<p>The Applicant acknowledges this comment but is confident that the level of consultation undertaken, and information presented throughout the pre-application stage was in accordance with the Planning Act 2008 and associated guidance. This has been evidenced in <b>5.1 Consultation Report [APP-022]</b>, which was submitted to the Planning Inspectorate and accepted for examination.</p> <p>Throughout the consultation process the Applicant has welcomed feedback from a range of stakeholders, including communities, landowners and occupiers, on the Scheme proposals. The outcome of this consultation and engagement is evidenced in <b>5.1 Consultation Report [APP-022]</b>, which was submitted to the Planning Inspectorate and accepted for examination.</p> <p>For example, Table 1.1 of Chapter 1 to <b>5.1 Consultation Report [APP-022]</b>, details how the cable route corridor for the Scheme has been refined through</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p>engagement and consultation with landowners and the community.</p> <p>Table 1.2 of Chapter 1 to <b>5.1 Consultation Report [APP-022]</b>, details how the Applicant provided consultation documents to Landowners to inform them regarding upcoming statutory consultation and methods to provide feedback.</p> <p>Chapter 7 <b>[APP-022]</b> describes the Applicant's approach to statutory consultation, including consulting with relevant authorities on a draft Statement of Community Consultation. Table 7.1 sets out the comments received from authorities on the Applicant's approach to consultation and how the Applicant has had regard to these in developing the Scheme. Table 7.3 in Chapter 7 describes how the Applicant complied with commitments made in the Statement of Community Consultation when undertaking statutory consultation.</p> <p>Chapter 8 <b>[APP-022]</b> describes how the Applicant undertook a six-week statutory phase two consultation on the Scheme, during which the Applicant presented consultees with environmental information sufficient for consultees to understand the potential likely significant effects of the Scheme in a Preliminary Environmental Impact Report (PEIR). A non-technical summary was published to accompany the PEIR, with public information events and free-to-use</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p>communications channels open to help aid accessibility and understanding of the Scheme. A Consultation Summary Report for this phase of statutory consultation was published on the dedicated Scheme website, shared with elected representatives and stakeholders and issued to over 9,000 properties within the vicinity of the Scheme, to help consultees understand how their feedback was being considered. A copy of the Phase Two Consultation Summary Report is provided at pp.36-43 of <b>5.7 Consultation Report - Appendix 5.7 Phase Two Community Consultation Materials - Part 3 of 3 [APP-031]</b>.</p> <p>Chapter 11 of <b>5.1 Consultation Report [APP-022]</b> describes the significant volume of responses received to Section 47 consultation (local community), including the issues raised and how the Applicant has had regard to these in developing the Scheme. This is further evidenced by <b>5.12 Consultation Report - Appendix 5.12 - Section 47 Applicant Response [APP-036]</b>.</p> <p>The host authorities have confirmed that the statutory consultation process was adequate <b>[AoC-001 to AoC-013]</b>.</p>
			<p>Some comments refer to the Scheme being placed out of the community's hands.</p>	<p>The Applicant is confident that the level of consultation undertaken and information presented throughout the pre-application stage is in accordance with the Planning Act 2008 and associated guidance. For example, as</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p>described in Chapter 2 of <b>5.1 Consultation Report [APP-022]</b>, the Applicant undertook two phases of community consultation to share information and invite feedback at different stages of Scheme development.</p> <p>Additionally, as stated in paragraph 5.2.2 of <b>7.5 Planning Statement [APP-313]</b>, the Scheme is defined as a nationally significant infrastructure project(NSIP) under Sections 14(1)(a), 15(1) and 15(2) of the Planning Act 2008.</p> <p>As such, under Section 103 of the Planning Act 2008, the Secretary of State has the responsibility of deciding an application for an order granting development consent, rather than the local planning authority.</p>
			<p>Some comments refer to the Stow Park Solar Scheme, indicating that schemes where the local community / authority decides should be prioritised.</p>	<p>Section 3.3 of document <b>7.11 Statement of Need [APP-320]</b> describes the Government's view that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar".</p> <p>Paragraph 8.5.10 and Section 8.5 <b>[APP-320]</b> more generally describe and express agreement with the Government's view that decentralised and community energy systems are unlikely to lead to the significant replacement of large-scale infrastructure, leading to support for large scale solar within the emerging draft National Policy Statements (March 2023) and</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				Government's view that large scale solar must be deployed to meet the urgent national need for low-carbon electricity generation. This means that both nationally significant infrastructure project proposals (determined by the relevant Secretary of State), and smaller proposals that will be determined by the local planning authority are required to meet the national need for renewable energy generating capacity.
GEN-02	RR-021; RR-156	Disclosure	Belief that there is no reference in the EIA to disclosure by the companies used to produce the document, nor reference to conflict of interest to assess whether there is impartial transparency.	The Applicant has appointed a range of professionally qualified consultants to undertake and compile the assessment work required in the preparation and submission of a DCO. Within <b>6.3.1.1 Environmental Statement - Appendix 1.1 Statement of Competence [APP-062]</b> sets out the qualifications and experiences of the EIA technical leads and coordinators. This is provided in order to comply with Paragraph 14(4)(b) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.
GEN-03	RR-058; RR-082; RR-088; RR-092; RR-099; RR-106; RR-120; RR-132; RR-169; RR-324; RR-336	General concerns	Belief that the Scheme will generally have a disproportionate negative impact on local individuals and communities.  Comments on disruption to a phenomenal number of people.	The Applicant is committed to providing a Community Benefit Fund (see paragraph 4.8.1 of <b>7.5 Planning Statement [APP-313]</b> ). This fund will be available for community-based benefits such as (but not limited to) community-led energy related projects.  With regard to local employment and the local economic environment, it is acknowledged that the majority of employment and economic benefit will be

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
			<p>Some comments refer to the application as being unfair.</p> <p>Some comments refer to the Scheme being a 'con', or a case of 'greenwashing'.</p>	<p>experienced in the construction industry (see para 4.6.1 bullet point 3 <b>[APP-313]</b>). That notwithstanding, there are wider anticipated benefits through indirect employment and spending which will benefit local manufacturers, suppliers, maintenance workers, and induced employment and spending which will benefit the wider local economy through increased spending by employees of the Scheme and its supply chains (see para 4.6.1). The full assessment of the extent of these likely effects is set out in Section 18.7 of <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b>.</p> <p>Impacts on the local socio-demographic environment across the Scheme's construction, operation, and decommissioning phases have also been assessed in Section 18.7 <b>[APP-056]</b>. This includes assessment of the existing resident demographic profile, access to primary healthcare, population health and wellbeing, deprivation, and skills and qualifications. Subject to mitigation and enhancement measures as set out in Section 18.8 <b>[APP-056]</b>, the Scheme is not anticipated to have any significant adverse impacts on the socio-demographic environment. The Scheme is however anticipated to have significant beneficial effects on access to employment (para. 18.8.12) and education (para. 18.8.13) as measures indices of deprivation during construction. A full table of the anticipated</p>



Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p>impacts on the socio-economic environment of the Local Impact Area (West Lindsey and Bassetlaw districts) can be found at Table 18.23 <b>[APP-056]</b>.</p> <p>Section 5 of <b>7.10 Skills Supply Chain and Employment Plan [APP-319]</b> demonstrates what additional measures are being pursued as part of the Scheme to provide local economic benefits. These include providing additional skills training (paras. 5.2.1 to 5.2.12), maximising local recruitment and enhancing opportunities for local procurement (paras. 5.3.1 to 5.4.6).</p> <p>The Applicant confirms that a Skills, Supply Chain and Employment Plan is secured by Requirement 20 of Schedule 2 to <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p> <p>Whilst the Scheme has not been able to avoid all significant residual adverse impacts, when considered against the community benefits (as above and explained in full through Section 4.6 of <b>7.5 Planning Statement [APP-313]</b>, the Applicant does not consider that the Scheme will disproportionately adversely impact the local community.</p> <p>The environmental benefits from the Scheme as identified in the Environmental Statement, its appendices, and other documents supporting the DCO Application, are secured by the requirements as set out</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				in Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> .
GEN-04	RR-063; RR-320	General concerns and PEIR inaccuracies	Respondent provides list of sections in the PEIR in which they believe is inaccurate. Respondent has also provided a list of general concerns associated with these.	<p>The Applicant is confident that the information presented in the DCO application submission documents is accurate.</p> <p>With regard to information regarding the generating capacity of the Scheme, and the benefit of the Scheme towards national electricity generation, the Applicant is confident that the information presented in <b>6.2.4 Environmental Statement - Chapter 4 Scheme Description [APP-042]</b>, <b>WB6.2.7_A ES Chapter 7 Climate Change Revision A [EN010132/EX1/WB6.2.7_A]</b>, and <b>7.11 Statement of Need [APP-320]</b> is accurate.</p> <p>The Applicant affirms to the Party that the consideration of alternatives and the Scheme's design evolution has been undertaken and is detailed within <b>6.2.5 Environmental Statement - Chapter 5 Alternatives and Design Evolution [APP-043]</b>. This includes the consideration of alternative substation locations (section 5.8) and alternative cable routes (Section 5.9).</p> <p>With regard to comments regarding the adequacy of the consultation process, throughout the consultation process the Applicant has welcomed feedback from a range of stakeholders, including communities,</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p>landowners and occupiers, on the Scheme proposals. The outcome of this consultation and engagement is evidenced in <b>5.1 Consultation Report [APP-022]</b>, which was submitted to the Planning Inspectorate and accepted for examination.</p> <p>For example, Chapter 7 <b>[APP-022]</b> describes the Applicant's approach to statutory consultation.</p> <p>Chapter 8 <b>[APP-022]</b> describes how the Applicant undertook a six-week statutory phase two consultation on the Scheme, during which the Applicant presented consultees with environmental information sufficient for consultees to understand the potential likely significant effects of the Scheme in a Preliminary Environmental Impact Report (PEIR). A non-technical summary was published to accompany the PEIR, with public information events and free-to-use communications channels open to help aid accessibility and understanding of the Scheme. A Consultation Summary Report for this phase of statutory consultation was published on the dedicated Scheme website, shared with elected representatives and stakeholders and issued to over 9,000 properties within the vicinity of the Scheme, to help consultees understand how their feedback was being considered. A copy of the Phase Two Consultation Summary Report is provided as <b>5.7 Appendix 5.7: Phase Two</b></p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p><b>Community Consultation Materials [APP-029 – APP-031].</b></p> <p>Chapter 11 of <b>5.1 Consultation Report [APP-022]</b> describes the significant volume of responses received to Section 47 consultation (local community), including the issues raised and how these were considered by the Applicant. This is further evidenced by <b>5.12 Appendix 5.12: Consultation Report Appendix – Section 47 Applicant Response [APP-036].</b></p>
GEN-05	RR-167	Keep informed	Respondent would like to be kept informed of developments with the Scheme.	The Applicant recommends that the Party utilises the Planning Inspectorate's "Email Updates" service, as can be accessed from the Planning Inspectorate's West Burton Solar Project home page.
GEN-06	RR-184	Moving to location of Scheme	Since becoming aware of the Scheme, the respondent believes this may affect whether they move.	The direct impact on the desirability of the area surrounding the Scheme to live within has not been assessed in the Environmental Statement. That notwithstanding, the likely impacts on the desirability and use of the area surrounding the Scheme for recreation has been assessed in Section 18.7 of <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056].</b> The assessment identifies a short- to medium-term moderate adverse effect on long distance recreational routes during the construction phase of the Scheme (para. 18.7.62). This effect is <b>significant adverse</b> , but is the only identified significant adverse effect to

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p>desirability and use of recreation sites nearby to the Scheme.</p> <p>The layout of the Sites has been informed by a series of design parameters and include offset distances as a result of needing to balance the functionality of the Scheme against environmental considerations (see paragraph 8.6.21 of <b>6.2.8 Environmental Statement - Chapter 8_Landscape and Visual Impact Assessment [APP-046]</b>).</p> <p>Paragraph 8.3.10 <b>[APP-046]</b> notes the [Secretary of State's] need to "judge whether the visual effects on sensitive receptors, such as local residents, and other receptors, such as visitors to the local area, outweigh the benefits of the project". The LVIA <b>[APP-046]</b> sets out details of the offsets that are proposed around sensitive receptors such as settlement edges, individual residential properties, PRoW and transport routes (see section 8.11 <b>[APP-046]</b>) which aim to assist in the assimilation and dispersion of the Scheme across the landscape.</p> <p>Mitigation, including offsets and planting are in line with the agreed methodology and the hierarchy of approach advocated by the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition and was agreed with Lincolnshire County Council (LCC) at the series of</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p>workshops, as set out in <b>6.3.8.4 Environmental Statement - Appendix 8.4 Consultation [APP-075]</b>.</p> <p>The LVIA (para. 8.6.21) <b>[APP-046]</b> notes with regard to ES Topic overlaps that <i>"With Ecology, the aim was to improve the value of the landscape and reflect appropriate local and regional aims and objectives for ecology and biodiversity. <b>The Outline Landscape and Ecological Management Plan (LEMP) [EN010132/APP/WB7.3]</b> sets out a framework for the establishment of planting on Site for the duration of the Scheme; together with the management and monitoring of the landscape and ecological mitigation and enhancement of habitats on which this framework is based"</i>.</p>
GEN-07	RR-279	Pilot Scheme	Suggestion for reducing the Scheme area, and the proposed area for Cottam Solar Project, by two-thirds, and treating the remainder as a pilot scheme.	<p>Figure 7.1 of <b>7.11 Statement of Need [APP-320]</b> shows National Grid Electricity System Operator's projections of the capacity of solar generation required to deliver a net-zero consistent system, which are 25 – 42GW by 2030, and 57 – 92GW by 2050, compared to just 14GW today as stated in paragraph 7.2.10.</p> <p>Paragraph 12.1.3 of <b>7.11 Statement of Need [APP-320]</b> concludes that "Large-scale solar generation is essential to support the urgent decarbonisation of the GB electricity sector" and paragraph 4.4.11 describes that the location of the Scheme presents a "highly suitable solution for the efficient delivery of solar at scale over timeframe which will provide significant</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				decarbonisation benefits". Resultingly, it concludes that this Scheme and others located near it will all be essential for the decarbonisation of the UK electricity sector.
GEN-08	RR-037; RR-267	Scheme operation	<p>Concern regarding ownership/operation of the Scheme if current Applicant goes out of business.</p> <p>Some comments refer to the ownership of Botley West Solar Farm and perceived links to Russia. Belief that this speaks for the wider solar industry in the UK.</p>	<p>Section 2.1 of <b>4.2 Funding Statement [APP-020]</b> sets out the corporate structure of the Applicant Island Green Power, Foresight Group and Macquarie Group have significant experience in developing and financing renewable energy projects including ground mounted solar. The Funding Statement also sets out the estimated costs of the Scheme and how it will be funded.</p> <p>The development consent order is personal to the Applicant (and National Grid in respect of Work No. 4). Article 35 requires the Secretary of State's consent to be obtained before the benefit of the draft DCO can be transferred to another company except in certain limited circumstances.</p> <p>Article 47 requires a parent company guarantee or other form of security that has been approved by the Secretary of State to be in place before the compulsory acquisition and temporary use powers can be exercised.</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p>Decommissioning of the Scheme is sufficiently secured by Requirement 21 of Schedule 2 of the draft DCO <b>[EX1/WB3.1_A]</b>. Decommissioning must take place when any part of the Scheme has permanently ceased to generate electricity on a commercial basis. Prior to decommissioning, the Applicant must submit a decommissioning plan to the relevant local planning authority for approval. The decommissioning plan must be substantially in accordance with the Outline Decommissioning Statement <b>[APP-310]</b> which is a certified document pursuant to Schedule 14 of the draft DCO. A breach of a requirement of a DCO, or a plan approved under it, is an offence pursuant to section 161 of the Planning Act 2008. If the Applicant were to fail to decommission the Scheme, or decommission the Scheme without preparing, submitting and having the decommissioning plan approved, then this would amount to a criminal offence which is sufficient deterrent to ensure compliance.</p> <p>Paragraph 5.4.7 of <b>7.10 Skills Supply Chain and Employment Plan [APP-319]</b> states that "Any procurement of supplies internationally will comply with both national and international law, and all policy and safety measures will be adhered to in the transportation of supplies."</p>



Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				A Skills, Supply Chain and Employment Plan is secured through Requirement 20 in Schedule 2 of the <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> .
GEN-09	RR-205; RR-257	Supply chain with Russia	Comment that any oil used will probably be Russian and therefore support the Russian invasion of Ukraine.	The Applicant is seeking consent for the West Burton Solar Farm, a renewable solar scheme. As detailed throughout the submission documents to the Examining Authority, the Scheme seeks to contribute to the UK's low carbon transition and removal of and dependency upon fossil fuels, wherever these may be sourced.
GEN-10	RR-122	Tillbridge Solar	Registration to object to Tillbridge Solar.	The Applicant notes this comment.

### 3.8 Glint and Glare

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
GLI-01	RR-021; RR-053; RR-067; RR-106; RR-154; RR-156; RR-312	Glint and Glare	<p>Concern that glint and glare from the solar panels will cause issues.</p> <p>Some comments refer to drivers being blinded by the glare from the solar panels.</p> <p>Some comments refer to the cumulative effect of all solar schemes in the region causing glint and glare risks on Lincoln Cliff Road.</p>	<p><b>6.3.16.1 Environmental Statement - Appendix 16.1 Solar Photovoltaic Glint and Glare Study [APP-132]</b> considers glint and glare effects upon receptors such as Public Rights of Way, dwellings, roads, railway infrastructure as well as aviation receptors (see the executive summary (pg.3 [APP-132])).</p> <p>Where glint and glare effects are predicted to be of "Moderate" or higher impact (paragraph 16.8.2 of <b>6.2.16 Environmental Statement - Chapter 16 Glint and Glare [APP-054]</b>) embedded mitigation has been implemented as part of <b>6.4.8.18.1_A-6.4.8.18.3_A Environmental Statement - Figures 8.18.1_A to 8.18.3_A - Landscape and Ecology Mitigation and Enhancement Measures [WB6.4.8.18.1_A to WB6.4.8.18.3_A]</b>).</p> <p><b>6.3.16.1 Environmental Statement - Appendix 16.1 Solar Photovoltaic Glint and Glare Study [APP-132]</b> considers the cumulative impacts of other solar schemes. A Minor/Negligible Adverse impact is predicted (see paragraph 16.10.3 of <b>6.2.16 Environmental Statement - Chapter 16 Glint and Glare [APP-054]</b>). The Applicant infers that the comment specifically is in relation to the B1398 road,</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				which has not been assessed due to it being located more than 1km away from the panelled area at the West Burton 1 Site.
			Some comments refer to light pollution causing adverse effects to local wildlife e.g. owls.	<p>The current guidance on this subject indicates that the risk posed to birds from solar panels is low, having regard to the conclusions of a 2016 Natural England literature review (NEER012 – Evidence Review of the Impact of Solar Farms on Birds, Bats and General Ecology 2016). Furthermore, Natural England have responded in Section 42 consultation to confirm that impacts upon birds associated with the Humber Estuary SPA are unlikely (see pg. 219-220 of <b>5.13 Consultation Report Appendix 5.13 – Section 42 Applicant Response [APP-037]</b>).</p> <p>The Applicant is not aware of any glint and glare issues affecting local wildlife and captive animals. Solar reflections originating from solar panels will be similar to the reflections originating from a body of water. Therefore, effects upon animals are likely to be similar to those assessed in Appendix B of <b>6.3.16.1 Environmental Statement - Appendix 16.1 Solar Photovoltaic Glint and Glare Study [APP-132]</b>.</p>
			Some comments refer to the risk to aviation due to glare from the panels.	<b>6.2.16 Environmental Statement - Chapter 16 Glint and Glare [APP-054]</b> has considered the impact upon aviation operations and infrastructure associated with the nearby airfields through sections 3.1 to 3.3 of

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
			<p>Some comments cite personal experiences of eye pain following living next to a solar farm.</p>	<p><b>6.3.16.1 Environmental Statement - Appendix 16.1 Solar Photovoltaic Glint and Glare Study [APP-132]</b> and concludes through paragraph 16.8.3 of <b>6.2.16 Environmental Statement - Chapter 16 Glint and Glare [APP-054]</b> that "Minor/Negligible Adverse effects are predicted in respect of aviation receptors." Furthermore, consultation with local airports and airfields has not resulted in any objection or concerns regarding glint and glare impacts on their operations.</p> <p>Appendix B within <b>6.3.16.1 Environmental Statement - Appendix 16.1 Solar Photovoltaic Glint and Glare Study [APP-132]</b> details studies assessing the intensity of solar reflections. Solar reflections originating from the Scheme will have a very similar intensity to that of water and will not be unlike reflections experienced by an individual in daily life.</p>

### 3.9 Hydrology, Flood Risk and Drainage

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
HFD-01	RR-010; RR-020; RR-022; RR-054; RR-106; RR-139; RR-154; RR-222; RR-251; RR-262; RR-284; RR-312	Flood risk	Comment that the Scheme and its associated components could cause a flood/drainage risk.	As stated in paragraph 10.8.19 and 10.8.20 of <b>6.2.10 Environmental Statement - Chapter 10 Hydrology Flood Risk and Drainage [APP-048]</b> maintaining the existing surface water run-off regime by utilising permeable surfacing for the Site access, linear infiltration trenches around any proposed infrastructure (substations and batteries) and wildflower planting at the leeward edge of solar panels will ensure that the Scheme is unlikely to generate surface water runoff rates beyond the baseline scenario and will therefore not contribute to additional flooding off-site.
			Some comments refer to the site area as being within an existing flood risk area.	The flood risk at the Sites and within the Cable Route Corridor has been assessed and is detailed within <b>6.3.10.1-6.3.10.6 Environmental Statement - Appendices 10.1-10.6 Flood Risk Assessment and Drainage Strategy Reports [APP-089 to APP-094]</b> . Embedded mitigation to ensure the Sites are at an acceptable risk of flooding is explained within section 10.7 of <b>6.2.10 Environmental Statement - Chapter 10 Hydrology Flood Risk and Drainage [APP-048]</b> .
			Some comments refer to the lack of mitigation for a flood.	The flood risk at the Sites and within the Cable Route Corridor has been assessed and is detailed within <b>6.3.10.1-6.3.10.6 Environmental Statement -</b>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
			<p>Some comments refer to the concern that the scheme will transfer more water into the dykes than previously and/or at a faster rate, due to a perception that the land will no longer hold the water which could possibly cause flooding further downstream.</p>	<p><b>Appendices 10.1-10.6 Flood Risk Assessment and Drainage Strategy Reports [APP-089 to APP-094].</b> Embedded mitigation to ensure the Sites are at an acceptable risk of flooding is explained within section 10.7 of <b>6.2.10 Environmental Statement – Chapter 10 Hydrology Flood Risk and Drainage [APP-048]</b></p> <p>As stated in paragraph 10.8.19 and 10.8.20 of <b>6.2.10 Environmental Statement – Chapter 10 Hydrology Flood Risk and Drainage [APP-048]</b> maintaining the existing surface water run-off regime by utilising permeable surfacing for the Site access, linear infiltration trenches around any proposed infrastructure (substations and batteries) and wildflower planting at the leeward edge of solar panels will ensure that the Scheme is unlikely to generate surface water runoff rates beyond the baseline scenario.</p> <p>As stated in <b>6.3.10.1 Environmental Statement – Appendix 10.1 Flood Risk Assessment and Drainage Strategy Report [APP-089]</b>, any runoff from hardstanding/small buildings on the Sites will be captured on site, to prevent increasing runoff from the Sites.</p> <p>Provision of a full surface water drainage scheme is secured by Requirement 11 in Schedule 2 of <b>3.1_A</b></p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
			<p>Some comments refer to the land in the area as clay-like, which will not absorb runoff water efficiently.</p>	<p><b>Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A].</b></p> <p>The existing underlying geology is considered as the baseline scenario and explained within <b>6.3.10.1 to 6.3.10.5 Environmental Statement – Appendix 10.1 to 10.5 Flood Risk Assessment and Drainage Strategy Report [APP-089 to APP-093]</b>,</p> <p>As stated in paragraph 10.8.19 and 10.8.20 of <b>6.2.10 Environmental Statement - Chapter 10 Hydrology Flood Risk and Drainage [APP-048]</b> maintaining the existing surface water run-off regime by utilising permeable surfacing for the Site access, linear infiltration trenches around any proposed infrastructure (substations and batteries) and wildflower planting at the leeward edge of solar panels will ensure that the Scheme is unlikely to generate surface water runoff rates beyond the baseline scenario.</p> <p>As stated in <b>6.3.10.1 Environmental Statement – Appendix 10.1 Flood Risk Assessment and Drainage Strategy Report [APP-089]</b>, any runoff from hardstanding/small buildings on the Sites will be captured on site, to prevent increasing runoff from the Sites.</p> <p>Provision of a full surface water drainage scheme is secured by Requirement 11 in Schedule 2 of <b>3.1_A</b></p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p><b>Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A].</b></p> <p>Some comments refer to laying new tracks and access routes during the construction process will cause compaction of the soil and ongoing maintenance will cause further compaction to the soil, which is already less aerated, reducing its ability to absorb rainwater.</p> <p>Concern that the Lincoln Flood Scheme will be used more and more going forward as Lincolnshire battles with climate change. Concern that a similar issue will take place with this Scheme.</p> <p>The compaction of soils is discussed in Section 4.0 of <b>6.3.10.1 Environmental Statement – Appendix 10.1 Flood Risk Assessment and Drainage Strategy Report [APP-089]</b>. Whilst compaction during the construction stages is possible, it will be mitigated and remediated through the measures set out in the soil management plan <b>6.3.19.2 Environmental Statement – Appendix 19.2 Outline Soil Management Plan [APP-138]</b>, which is secured by Requirement 19 of Schedule 2 to <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p> <p>As stated in paragraph 10.8.19 and 10.8.20 of <b>6.2.10 Environmental Statement - Chapter 10 Hydrology Flood Risk and Drainage [APP-048]</b> maintaining the existing surface water run-off regime by utilising permeable surfacing for the Site access, linear infiltration trenches around any proposed infrastructure (substations and batteries) and wildflower planting at the leeward edge of solar panels will ensure that the Scheme is unlikely to generate surface water runoff rates beyond the baseline scenario.</p> <p>Maintaining the existing surface water run-off regime will ensure the Scheme will not contribute to additional</p>



Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				flooding off-site and therefore will not contribute to additional or more frequent use of the River Till Flood Storage Reservoir or any other flood infrastructure over and above the existing baseline scenario.

### 3.10 Landscape and Visual Impact

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
LAN-01	RR-267	Broxholme views	<p>Concern that the flat landscape means that the Scheme will be clearly visible from Broxholme.</p> <p>Further concern that three of the four walking or driving routes used by the respondent will be blighted.</p>	<p>The Scheme will provide extensive areas of mitigation along the existing sections of footpaths, bridleways and driving routes to enhance their amenity value and benefit the public as a whole, as demonstrated in <b>6.2.8 Environmental Statement -Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> (the 'LVIA') (see paragraphs 8.8.22 to 8.9.29). With regard to Broxholme, the proposed mitigation would apply to receptors PR006 (Brox/198/1), PR007 (Brox/197/1) and PR008 (Brox/196/1), which are shown on <b>6.4.8.10.1 Environmental Statement - Figure 8.10.1 PRoW Receptors - West Burton 1 [APP-180]</b>.</p> <p>The landscape mitigation measures are shown on <b>EN010132/EX1/WB6.4.8.18.1_A</b> - to <b>EN010132/EX1/WB6.4.8.18.3_A</b> Figures 8.18.1-A to 8.18.3-A Landscape and Ecology Mitigation and Enhancement Plans <b>[WB6.4.8.18.1_A to WB6.4.8.18.3_A]</b>.</p> <p>Please also refer to <b>EN010132/EX1/WB7.3_A Outline Landscape and Ecological Management Plan [EN010132/EX1/WB7.3_A]</b> which is secured by Requirement 7 in Schedule 2 of 3.1_A Draft</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p>Development Consent Order Revision A <b>[EN010132/EX1/WB3.1_A]</b>.</p> <p>The LVIA <b>[APP-046]</b> also considers the impacts and effects on residential receptors as part of the assessment process. The assessment has considered residential receptors within the 1km Study Area for the Scheme and the 0.5km Study Area from the outer boundary of the Cable Route Corridor (para. 8.4.12). The detailed analysis of these residential receptors is set out at <b>6.3.8.3 Environmental Statement - Appendix 8.3 Assessment of Potential Visual Effects [APP-074]</b>. The relevant singular buildings in the vicinity of Broxholme include R012, R013, R014, R015 and R096 and groups of buildings include R034 and R078.</p> <p>The Applicant is cognisant of the significance of the countryside for physical and mental wellbeing and, as such, likely impacts on the desirability and use of recreational facilities in the countryside, such as public rights of way, have been assessed in Section 18.7 of <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b>. The greatest level of effect to access, desirability and use of public rights of way near Broxholme during construction is short-term moderate-minor adverse (see Table 18.15). This is not considered to be</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				significant. Furthermore, during operation, the level of impact on these public rights of way is anticipated to be no greater than a long-term minor adverse effect (see Table 18.20). These effects are not considered to be significant.
LAN-02	RR-005; RR-007; RR-013; RR-019; RR-022; RR-024; RR-026; RR-040; RR-042; RR-048; RR-053; RR-055; RR-060; RR-061; RR-066; RR-067; RR-070; RR-071; RR-075; RR-078; RR-082; RR-088; RR-097; RR-098; RR-102; RR-113; RR-116; RR-121; RR-130; RR-138; RR-151; RR-165; RR-168; RR-170; RR-171; RR-174; RR-175; RR-176; RR-186; RR-190; RR-194; RR-195; RR-202; RR-203; RR-205; RR-214; RR-215; RR-222; RR-223; RR-226; RR-240; RR-247; RR-248; RR-257; RR-258; RR-260; RR-261; RR-262; RR-263; RR-264; RR-268; RR-273; RR-274;	Landscape quality	Comments that living in the countryside is the choice of residents and people do not want to lose that amenity/way of life by living with and around solar infrastructure.	The Applicant is cognisant of the significance of the countryside for physical and mental wellbeing and, as such, likely impacts on the desirability and use of recreational facilities in the countryside, such as public rights of way, have been assessed in Section 18.7 of <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b> . The greatest level of effect to access, desirability and use of recreational facilities is limited to short- to medium-term moderate adverse effects on long distance recreational routes (the Trent Valley Way and National Byways) during construction (see Table 18.15 and para. 18.7.62). This is considered to be <b>significant adverse</b> . This is however the only significant adverse effect anticipated, with no greater than moderate-minor adverse anticipated to any other recreational receptor during construction (see paras. 18.7.60 to 18.7.69), or to any recreational receptor during operation (see paras. 18.7.107 to 18.7.117) and decommissioning (see paras. 18.7.147 to 18.7.157). These effects are not anticipated to be significant.

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
	RR-275; RR-278; RR-279; RR-283; RR-288; RR-292; RR-293; RR-296; RR-301; RR-307; RR-313; RR-316; RR-325; RR-326; RR-329; RR-334; RR-338; RR-346		Some comments refer to a loss of the rural environment.	<p>This is re-iterated in Section 21.5 of <b>6.2.21 Environmental Statement - Chapter 21 Other Environmental Matters [APP-059]</b>.</p> <p>The effects on the rural environment, countryside and natural beauty have been taken into consideration in the assessment of both the landscape and visual effects, which is set out within the <b>6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> (the 'LVIA'). The detailed assessment information can be found within the individual receptor sheets at <b>6.3.8.2 Environmental Statement - Appendix 8.2 Assessment of Potential Landscape Effects [APP-073]</b> and <b>6.3.8.3 Environmental Statement - Appendix 8.3 Assessment of Potential Visual Effects [APP-074]</b>. The assessment has taken account of the individual elements of the Scheme such as the panels, fencing, battery storage, substations and access arrangements.</p> <p>Please refer to <b>7.3_A Outline Landscape and Ecological Management Plan [EN010132/EX1/WB7.3_A]</b> which is secured by Requirement 7 in Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>. The mitigation measures are also shown on the WB6.4.8.18.1_A- to WB6.4.8.18.3_A Figures 8.18.1_A to 8.18.3_A Landscape and Ecology</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				Mitigation and Enhancement Plans [ <b>WB6.4.8.18.1_A to WB6.4.8.18.3_A</b> ].
			Some comments refer to the proximity of the Scheme in relation to their property as an issue.	The LVIA [ <b>APP-046</b> ] also considers the impacts and effects on residential receptors as part of the assessment process. The assessment has considered residential receptors within the 1km Study Area for the Scheme and the 0.5km Study Area from the outer boundary of the Cable Route Corridor (para. 8.4.12). The detailed analysis of these residential receptors is set out at <b>6.3.8.3 Environmental Statement - Appendix 8.3 Assessment of Potential Visual Effects [APP-074]</b> .
			Some comments refer to personal distress in regard to living next to/around the Scheme.	The LVIA [ <b>APP-046</b> ] considers that for some aspects of the Scheme (the construction phase in particular), the presence of the panels has been assessed to result in an adverse effect. Where impacts and effects are identified then landscape mitigation measures are applied to avoid or reduce any adverse effects.  Please refer to <b>7.3_A Outline Landscape and Ecological Management Plan [EN010132/EX1/WB7.3_A]</b> which is secured by Requirement 7 in Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> . The mitigation measures are also shown on the WB6.4.8.18.1_A- to WB6.4.8.18.3_A Figures 8.18.1_A to 8.18.3_A Landscape

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
			<p>Some comments refer to living with the consequences of the Scheme / Applicant, with claims the countryside will be damaged beyond repair.</p>	<p>and Ecology Mitigation and Enhancement Plans [WB6.4.8.18.1_A to WB6.4.8.18.3_A].</p> <p>Where the LVIA [APP-046] has identified significant adverse effects, extensive landscape mitigation is proposed in the <b>7.3_A Outline Landscape and Ecological Management Plan [EN010132/EX1/WB7.3_A]</b> and is also shown on <b>6.4.8.18.1_A -6.4.8.18.3_A Environmental Statement - Figures 8.18.1_A to 8.18.3_A - Landscape and Ecology Mitigation and Enhancement Measures [WB6.4.8.18.1_A to WB6.4.8.18.3_A]</b>, which are secured by Requirement 7 in Schedule 2 of <b>3.1 Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>. The mitigation seeks to visually enhance the landscape through the addition of new planting and the positive management of the existing tree and hedgerow stock. This mitigation also seeks to reduce the visibility of the Scheme and help with its assimilation into the landscape from public vantage points including transport routes, public footpaths, permissive footpaths and green lane networks. This mitigation is aimed to benefit the community as a whole as well as tourists, visiting walkers, local residents, ornithologists and cyclists. The landscape mitigation measures will provide new planting, which will include new native hedgerows and</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				tree cover, and this will also include their management and maintenance.
			<p>Some comments refer to a loss of recreational activities, including horse riding, dog walking, walking, green spaces etc.</p> <p>Some comments refer to the loss of PRoW and bridleways.</p>	<p>Public Rights of Way may be subject to short-term temporary diversions or closures to facilitate cable laying as set out in para 3.13 of <b>6.3.14.3_A Environmental Statement - Appendix 14.3 Outline Public Rights of Way Management Plan Revision A [EN010132/EX1/WB6.3.14.3_A]</b>. All Public Rights of Way on and surrounding the Sites are to remain open during construction where feasible, and all existing Public Rights of Way are to be retained during the Scheme's operational lifetime.</p> <p>A Public Rights of Way Management Plan that is substantially in accordance with the outline PRoWMP <b>[EN010132/EX1/WB6.3.14.3_A]</b> will be implemented during the construction phase of the Scheme, and will be submitted and approved prior to the commencement of development, as secured through Requirement 18 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p>
LAN-03	RR-007; RR-019; RR-021; RR-034; RR-045; RR-047; RR-053; RR-056; RR-058; RR-063; RR-072; RR-075; RR-079; RR-082; RR-095;	View of site	Comments that the site will look like an industrial site, and make the surrounding area and villages a part of this.	<b>6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> (the 'LVIA') considers the impacts and effects on the surrounding area and villages with residential receptors as part of the assessment process. The assessment has



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	RR-097; RR-102; RR-103; RR-104; RR-106; RR-107; RR-110; RR-111; RR-114; RR-116; RR-118; RR-119; RR-121; RR-125; RR-126; RR-138; RR-152; RR-153; RR-156; RR-157; RR-165; RR-175; RR-180; RR-186; RR-187; RR-191; RR-194; RR-196; RR-202; RR-205; RR-206; RR-210; RR-214; RR-217; RR-222; RR-223; RR-225; RR-235; RR-240; RR-247; RR-252; RR-256; RR-257; RR-260; RR-262; RR-263; RR-267; RR-268; RR-271; RR-272; RR-273; RR-276; RR-278; RR-284; RR-287; RR-290; RR-293; RR-296; RR-307; RR-312; RR-316; RR-325; RR-328; RR-334; RR-343			<p>considered residential receptors within the 1km Study Area for the Scheme and the 0.5km Study Area from the outer boundary of the Cable Route Corridor (para. 8.4.12). The detailed analysis of these residential receptors is set out at <b>6.3.8.3 Environmental Statement - Appendix 8.3 Assessment of Potential Visual Effects [APP-074]</b>.</p> <p>The mitigation measures are shown on the WB6.4.8.18.1- to WB6.4.8.18.3 Figures 8.18.1 to 8.18.3 Landscape and Ecology Mitigation and Enhancement Plans [<b>WB6.4.8.18.1_A to WB6.4.8.18.3_A</b>]. Please also refer to 7.3_A Outline Landscape and Ecological Management Plan Revision A [EN010132/EX1/WB7.3_A] which is secured by Requirement 7 in Schedule 2 of 3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A].</p>
			Some comments refer to this opinion using differing language and phrases e.g. a sea of glass / industrial site / megawatt valley / eyesore.	<p>The Scheme will also provide extensive areas of mitigation in the area surrounding the villages, for example along the existing sections of footpaths, bridleways and driving routes to enhance their amenity value and benefit the public as a whole, as demonstrated in the LVIA (see paragraphs 8.8.22 to 8.9.29) [<b>APP-046</b>].</p> <p>The mitigation measures are shown on the WB6.4.8.18.1_A- to WB6.4.8.18.3_A Figures 8.18.1_A to 8.18.3_A Landscape and Ecology Mitigation and</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p>Enhancement Plans <b>[WB6.4.8.18.1_A to WB6.4.8.18.3_A]</b>. Please also refer to <b>7.3_A Outline Landscape and Ecological Management Plan [EN010132/EX1/WB7.3_A]</b> which is secured by Requirement 7 in Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p>
			<p>Some comments refer to the height of the solar panels (4.5m) as a concern.</p>	<p>The landscape mitigation measures also seek to provide new planting to mitigate the potential impacts and effects of glint and glare for the Scheme's operational lifetime. This mitigation includes new native hedgerows and tree cover, and covers management and maintenance.</p> <p>The mitigation measures are shown on the WB6.4.8.18.1_A- to WB6.4.8.18.3_A Figures 8.18.1_A to 8.18.3_A Landscape and Ecology Mitigation and Enhancement Plans <b>[WB6.4.8.18.1_A to WB6.4.8.18.3_A]</b>. Please also refer to <b>7.3_A Outline Landscape and Ecological Management Plan [EN010132/EX1/WB7.3_A]</b> which is secured by Requirement 7 in Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p>
			<p>Some comments refer to the proposed Scheme as visually intrusive.</p>	<p>The LVIA <b>[APP-046]</b> considers the visual effects of the Scheme and the assessment includes a suite of viewpoints that cover a wide range of visual receptors,</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p>including public locations such as transport routes, PRow and residential properties. The assessment of visual effects concludes that at some receptors, there would be significant adverse effects at construction and year 1 of operation, but with the implementation of mitigation this is reduced across the majority of these receptors to '<b>Not Significant</b>' (in EIA terms) at year 15 of operation.</p> <p>The mitigation measures are shown on the WB6.4.8.18.1_A- to WB6.4.8.18.3_A Figures 8.18.1_A to 8.18.3_A Landscape and Ecology Mitigation and Enhancement Plans <b>[WB6.4.8.18.1_A to WB6.4.8.18.3_A]</b>. Please also refer to <b>7.3_A Outline Landscape and Ecological Management Plan [EN010132/EX1/WB7.3_A]</b> which is secured by Requirement 7 in Schedule 2 of <b>3.1-A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p>
			<p>Some comments refer to general concern regarding how the Scheme will look.</p>	<p>Public vantage points from in and around the villages are also considered within the LVIA <b>[APP-046]</b>, for example viewpoints VP01 and VP08 associated with the settlement of Broxholme, VP18 and VP28 the settlement of Ingleby and VP21, VP22 and VP23 with the settlement of Saxilby. These public vantage points are shown on <b>6.4.8.12.1-6.4.8.12.3 Environmental Statement - Figures 8.12.1 to 8.12.3 - Augmented ZTVs [APP-190 to APP-192]</b>.</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
			Some comments refer to the Scheme, or multiple Schemes, dominating the local landscape.	In terms of appearance, the assessment has taken account of the individual elements of the Scheme such as the panels, fencing, battery storage, substations and access arrangements to ensure the best possible fit with the landscape. The photography and photomontage information at <b>6.4.8.13.1-6.4.8.13.72 Environmental Statement - Figures 8.13.1 to 8.13.72 [APP-194 to APP-265]</b> shows how these elements are comfortably accommodated within the existing landscape.
			Some comments refer to little or no visual mitigation of the Scheme.	Cumulative effects assessments have been prepared for the Application including within the LVIA <b>[APP-046]</b> where it is recognised that The Scheme comprises a series of separate Sites (see Sections 3.3 to 3.6 of <b>6.2.3 Environmental Statement Chapter 3 The Order Limits [APP-041]</b> ). These areas of land are set within an extensive agricultural landscape and each is set apart by their associated features such as robust hedgerows, woodland and tree cover, intervening settlements and road and rail infrastructure (see paragraphs 8.5.115, 8.5.132 and 8.5.148 of the LVIA <b>[APP-046]</b> ).  The mitigation measures are shown on the WB6.4.8.18.1_A- to WB6.4.8.18.3_A Figures 8.18.1_A to 8.18.3_A Landscape and Ecology Mitigation and Enhancement Plans <b>[WB6.4.8.18.1_A to WB6.4.8.18.3_A]</b> . Please also refer to <b>7.3_A Outline Landscape and Ecological Management Plan</b>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p><b>[EN010132/EX1/WB7.3_A]</b> which is secured by Requirement 7 in Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b></p>
			<p>Some comments refer to length of time (40 years) in which the site will be an eyesore for.</p>	<p>The LVIA <b>[APP-046]</b> considers that for some aspects of the Scheme (the construction phase in particular), the presence of the panels has been assessed to result in an adverse effect. Where impacts and effects are identified then landscape mitigation measures are applied to avoid or reduce any adverse effects.</p> <p>The mitigation measures are shown on the WB6.4.8.18.1_A- to WB6.4.8.18.3_A Figures 8.18.1_A to 8.18.3_A Landscape and Ecology Mitigation and Enhancement Plans <b>[WB6.4.8.18.1_A to WB6.4.8.18.3_A]</b>. Please also refer to <b>7.3_A Outline Landscape and Ecological Management Plan [EN010132/EX1/WB7.3_A]</b> which is secured by Requirement 7 in Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b></p>
			<p>Some comments refer to a lack of visual mitigation for the site.</p>	<p>Mitigation, including offsets and planting, has been proposed to address and minimise adverse effects on the visual amenity of the landscape. This is in line with the agreed methodology and the hierarchy of approach advocated by the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition and was agreed with Lincolnshire County Council at a series of workshops, as</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p>set out in <b>6.3.8.4 Environmental Statement - Appendix 8.4 Consultation [APP-075]</b>.</p> <p>The mitigation measures are shown on the WB6.4.8.18.1_A- to WB6.4.8.18.3_A Figures 8.18.1_A to 8.18.3_A Landscape and Ecology Mitigation and Enhancement Plans [<b>WB6.4.8.18.1_A to WB6.4.8.18.3_A</b>]. Please also refer to <b>7.3_A Outline Landscape and Ecological Management Plan [EN010132/EX1/WB7.3_A]</b> which is secured by Requirement 7 in Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b></p>
			<p>Some comments refer to the substation or BESS, at 13.5m, being an eyesore.</p>	<p>Effects associated with the Substations are included within the assessment of each individual Site. In-combination effects of the Substations were also considered.</p> <p>The BESS is proposed alongside the substation on West Burton 3 only and is included within the assessment of the West Burton 3 Site.</p> <p>Where the LVIA has identified significant adverse effects, extensive landscape mitigation is set out in <b>7.3_A Outline Landscape and Ecological Management Plan [EN010132/EX1/WB7.3_A]</b> and is also shown on <b>6.4.8.18.1-6.4.8.18.3 Environmental Statement - Figures 8.18.1 to 8.18.3 - Landscape and</b></p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p><b>Ecology Mitigation and Enhancement Measures [WB6.4.8.18.1_A to WB6.4.8.18.3_A].</b> This mitigation seeks to visually enhance the landscape through the addition of new planting and the positive management of the existing tree and hedgerow stock. This mitigation also seeks to reduce the visibility of the Scheme and help with its assimilation into the landscape (within defined buffer zones) from public vantage points including transport routes, public footpaths, permissive footpaths and green lane networks. This mitigation is aimed to benefit the community as a whole as well as tourists, visiting walkers, local residents, ornithologists and cyclists. The landscape mitigation measures will provide new planting, which will include new native hedgerows and tree cover, and this will also include their management and maintenance.</p> <p>The mitigation measures are shown on the WB6.4.8.18.1_A to WB6.4.8.18.3_A Figures 8.18.1_A to 8.18.3_A Landscape and Ecology Mitigation and Enhancement Plans <b>[WB6.4.8.18.1_A to WB6.4.8.18.3_A]</b>. Please also refer to <b>7.3_A Outline Landscape and Ecological Management Plan [EN010132/EX1/WB7.3_A]</b> which is secured by Requirement 7 in Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
LAN-04	RR-004; RR-005; RR-007; RR-010; RR-015; RR-019; RR-021; RR-022; RR-040; RR-045; RR-047; RR-048; RR-053; RR-055; RR-056; RR-061; RR-066; RR-079; RR-082; RR-097; RR-100; RR-101; RR-102; RR-106; RR-107; RR-110; RR-111; RR-118; RR-119; RR-121; RR-126; RR-130; RR-138; RR-155; RR-156; RR-157; RR-158; RR-164; RR-168; RR-171; RR-174; RR-175; RR-183; RR-187; RR-190; RR-194; RR-196; RR-200; RR-201; RR-202; RR-205; RR-206; RR-211; RR-217; RR-227; RR-247; RR-248; RR-252; RR-255; RR-256; RR-257; RR-260; RR-261; RR-262; RR-269; RR-278; RR-283; RR-288; RR-290; RR-293; RR-296; RR-301; RR-302; RR-305; RR-306; RR-307; RR-312; RR-334;	Visual impact	<p>Comments that there will be a loss of local/traditional Lincolnshire countryside views.</p> <p>Some comments refer to the view from the B1398/Lincoln cliff, Middle street/Hemswell cliff and Scampton viewpoint, and of Lincoln cathedral being worsened.</p> <p>Some comments refer to views of historic value in Lincolnshire being lost.</p>	<p><b>6.2.8 Environmental Chapter - Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> (the 'LVIA') takes account of countryside views and the intervisibility between the Scheme and Lincoln Castle and Lincoln Cathedral.</p> <p><b>6.3.13.5 Environmental Statement - Appendix 13.5 Heritage Statement [APP-117 to APP-119]</b>, provides a detailed assessment of all Grade II Listed Buildings and Conservation Areas within 2km of the Scheme, and all Grade I and II* Listed Buildings and Scheduled Monuments within a 5km study area surrounding the Scheme. It was considered that at c.8.2km distant at its nearest point, and up to c.16km distant at its furthest point, there would be no significant impacts upon views towards Lincoln Cathedral as a result of the Scheme.</p> <p>Because of the overlap between the topics, detailed consultation with the Heritage topic leads has also been undertaken when developing the landscape and visual baseline and in identifying landscape and visual effects for the LVIA in the context of heritage receptors. This is set out within <b>6.3.8.4 Environmental Chapter - Appendix 8.4 Consultation [APP-075]</b>.</p> <p>The extent of the Study Area has been determined in accordance with recognised LVIA methodology to encompass all receptors that may experience significant effects. In light of the nature of the</p>



Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
	RR-335; RR-336; RR-338; RR-340			<p>surrounding terrain with some elevated viewpoints, the assessment has considered the potential for landscape and visual receptors to be affected that are close to but outside the 5km buffer area.</p> <p>Additional in the LVIA <b>[APP-046]</b> suggested by the Canal &amp; River Trust, Lincolnshire County Council and Bassetlaw District Council that take account of locations where heritage assets may be affected are taken into account at Section 8.2. This includes viewpoint VP35 that is representative of views from the Fossdyke Canal in addition to viewpoints VP35 and VP49 taken next to water spaces. This assessment has included boaters as a receptor at low speed as their users are likely to be impacted as walkers and horse riders. In addition, boaters mooring on the Fossdyke Canal, who may be in situ for long term, are also taken into account in the LVIA.</p> <p>The LVIA <b>[APP-046]</b> has also included the River Trent as a visual receptor with viewpoints VP49 and LCC-C-K, which are representative viewpoints along this river corridor. For the West Burton 3 Site, Bassetlaw District Council also suggested adding Torksey Viaduct as viewpoint LCC-C-N, given it sits at a higher elevation. This viewpoint was included in the LVIA, please refer to paragraph 8.5.214.</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
			Some comments refer to the Scheme being built in an area of natural beauty, or AONB.	The Scheme is not located within an AONB. The nearest AONB to the Scheme is the Lincolnshire Wolds AONB which lies some 25km to the east of the Scheme. The Scheme is also not located within any locally designated landscape such as Area of Great Landscape Value (AGLV). The Ridge AGLV however is located approximately 2.3km east of the West Burton 1 Site and 3.6km east of the West Burton 2 Site, and the Laughton Wood AGLV is located approximately 350m to the northeast of the West Burton 3 Site. In recognition of the close proximity to the Laughton Wood AGLV and the distinct landform of the Ridge AGLV leading north from Lincoln, the LVIA [APP-046] takes account of these two designations.
LAN-05	RR-002	Visual impact of Solar	Belief that the view from solar panels will be better than the view of cooling towers.	The Applicant notes this comment.

### 3.11 Other Environmental Matters

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
OEM-01	RR-021; RR-022; RR-025; RR-034; RR-137; RR-139; RR-142; RR-156; RR-180; RR-182; RR-202; RR-205; RR-220; RR-235; RR-247; RR-257; RR-273; RR-284; RR-316; RR-323; RR-340	Public Health	Concern that public health will be detrimentally affected by the Scheme.	The Applicant seeks to assure the public that the only identified significant adverse effect on human health and wellbeing as a result of the Scheme is anticipated to be a short- to medium-term temporary moderate adverse effect on desirability and use of long-distance recreation routes during construction (see Table 18.15 and para. 18.7.62 of <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b> ). No other significant adverse effects to human health and well-being have been identified in the Environmental Statement, as summarised in Section 21.5 of <b>6.2.21 Environmental Statement - Chapter 21 Other Environmental Matters [APP-059]</b> .
			Some comments refer to increased claustrophobia due to being surrounded by the panels.	The Scheme has been designed to enhance and retain the open character of the landscape, where applicable, including recognition of the existing landscape pattern and features that give the Site/s and the 5km Study Area its unique open character. Effects on landscape character will be experienced at the local level and it is recognised that some features will undergo change, but the majority of the key characteristics that contribute to openness will not be altered. For example, <b>6.2.8 Environmental Chapter - Chapter 8 Landscape and</b>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p><b>Visual Impact Assessment [APP-046]</b> (the 'LVIA') notes in Table 8.49 that in respect to planting there will be <i>"The careful use of scattered tree and hedge planting to avoid undue impacts on the open character of the area"</i>. The open scenic aspect of the Unwooded Vales is also acknowledged within the LVIA <b>[APP-046]</b> (para.8.9.13) <i>"Overall, the character of the Unwooded Vales is shaped by the strong agricultural presence, with wide areas retaining a strong sense of rural tranquillity. In contrast, the low levels of woodland cover create a relatively open and expansive landscape comprising an arable land use within a scattered pattern of settlement"</i>. With regard to views, Table 8.76 of the LVIA notes in respect to Viewpoints VP18 and VP28 and Transport Receptor T009 that <i>"Views of open arable farmland to the north of Saxilby would remain reinforcing the rural location of this settlement"</i>.</p>
			<p>Some comments refer to light pollution effects as an issue.</p>	<p>As stated within paragraph 2.6.1 of <b>7.1_A Outline Construction Environmental Management Plan Revision A [EN010132/EX1/WB7.1_A]</b> (CEMP), lighting (during construction) will be required for safety reasons but will be temporary in nature and predominately limited to the core working hours.</p> <p>Provision of a detailed CEMP is secured by Requirement 13 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p>Paragraph 2.5.1 of <b>7.14_A Outline Operational Environmental Management Plan Revision A [EN010132/EX1/WB7.14_A]</b>, secured by Requirement 14 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>, notes that no part of the Scheme will be continuously lit and that the use of motion detection security lighting will avoid permanent lighting.</p> <p>Lighting is not required within the solar arrays. Lighting will be provided within substations and within the Energy Storage site to be used only in the event of it being required for maintenance and security purposes. Down lighting would be used on lighting columns of a maximum height of 3m.</p>
			Some comments refer to construction noises causing physical and mental health issues.	The noise impact has been assessed in Section 15.7 of <b>6.2.15 Environmental Statement – Chapter 15 Noise and Vibration [APP-053]</b> . No significant adverse impacts have been identified during both the construction and operational phases.
			Some comments refer to noise pollution / low pitch humming from substations as an issue.	The noise impact arising from the substations has been assessed in Section 15.7 of <b>6.2.15 Environmental Statement – Chapter 15 Noise and Vibration [APP-053]</b> . No significant adverse impacts have been identified during both the construction and operational phases. Octave band source data has been used throughout the assessment and a tonal penalty has

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				been applied to account for any just perceptible tonal characteristics at the nearest receptors.
			Some comments refer to the health system not being able to meet the influx of people during the construction period.	<p>The assessment of impact on access to primary healthcare is based on GP Practice data from December 2022 (para. 18.5.20 in <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b>), which shows an above national average number of GPs per population in the Local Impact Area.</p> <p>The impact of population uplift from construction workers is set out in para. 18.7.28 <b>[APP-056]</b> which does not assess there will be a significant adverse impact to existing access to primary healthcare (GP practices). Impacts on other healthcare providers, hospitals, and emergency care have not been assessed as these have not been identified as areas to be assessed by relevant health consultees such as the UKHSA or Lincolnshire Care Commissioning Group (refer to Tables 18.1 and 18.2 <b>[APP-056]</b>).</p>
			Some comments referred to an increased risk of cancer due to the Scheme.	<p>The Applicant is not aware of any studies, findings or empirical evidence which would suggest that the construction, operation and decommissioning of the Scheme would result in an increased risk of cancer. As per paragraph 20.7.24 of <b>6.2.20 Environmental Statement - Chapter 20_Waste [APP-058]</b>, "the Solar PV arrays and related components, substations,</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p>ancillary infrastructure, and the Energy Storage compound will be removed, and recycled or disposed of in accordance with good practice and market conditions at that time". The Decommissioning of the Scheme is secured by Requirement 21 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p>
			<p>Some comments refer to solar farms producing toxic materials which pollute the water systems.</p>	<p>The assessment of the impact to controlled waters including the surrounding surface waters is detailed in Section 11.8 of <b>6.2.11 Environmental Statement – Chapter 11 Ground Conditions and Contamination [APP-049]</b>. No significant adverse impacts have been identified during the construction, operational or decommissioning phases.</p> <p>As addressed in paragraphs 10.8.11 – 10.8.16 of <b>6.2.10 ES Chapter 10 Hydrology, Flood Risk and Drainage [APP-048]</b>, given the nature of the energy storage within the Scheme, there is a potential risk of fire which could result in the mobilisation of pollution within surface water run-off. The Applicant has submitted <b>7.9 Outline Battery Storage Safety Management Plan [APP-318]</b> and, through <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>, has secured by Requirement 6 of Schedule 2 that "<i>Work No. 2 must not commence until a battery storage safety</i></p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p><i>management plan has been submitted to and approved by the relevant planning authority."</i></p> <p>Paragraph 4.1.18 of <b>7.9 Outline Battery Storage Safety Management Plan [APP-318]</b> explains that the design of the BESS has integrated fire detection and suppression systems that will automatically operate to contain battery fires. Paragraph 5.3 states that if fire spreads to multiple units, external firefighting water facilities are available by means of 228,000 litre water storage tanks within the battery compounds.</p> <p>It is proposed that runoff from the energy storage area will be contained by local bunding and attenuated within gravel subgrade of lined permeable SuDS features prior to being passed forward to the local land drainage network. In the event of a fire, a system of automatically self-actuating valves at the outfalls from the battery storage areas will be closed, isolating the battery storage area's drainage from the wider environment. The water contained by the valves will be tested and either treated and released or tankered off-site as necessary and in consultation with the relevant consultees (including but not limited to Lincolnshire County Council, as Lead Local Flood Authority, and the Environment Agency) at the time.</p>



Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
OEM-02	RR-253	Safety of Scheme	Comment that the safety of the Scheme is worrying.	The Applicant seeks to assure the Interested Party that no significant adverse effects to human health and safety have been identified in the Environmental Statement, as summarised in Section 21.5 of <b>6.2.21 Environmental Statement - Chapter 21 Other Environmental Matters [APP-059]</b> . Mitigation measures to ensure safety is maintained throughout the Scheme's construction, operation, and decommissioning are secured through the control documents secured by the requirements in Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> .
OEM-03	RR-327	TV Reception	Concern that TV reception will be impacted.	<p>Direct impacts on television reception due to the height of infrastructure are not anticipated. Assessment of the impacts on television reception were scoped out of the Environmental Statement on this basis (see Section 3.19 of <b>6.3.2.2 Environmental Statement - Appendix 2.2 EIA Scoping Opinion [APP-068]</b>).</p> <p>Electromagnetic fields attributed to power have a frequency of ~50Hz. Any resultant interference is therefore limited to this frequency and its harmonics, all which fall into the category of extremely-low or super-low frequency radio waves (&lt;300Hz). Television channel transmissions, are generally between 50MHz and 800MHz and so will not be adversely affected the Scheme. Furthermore, the propagation of</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				electromagnetic fields attributed to power is likely to be limited to within the Scheme extents and a narrow corridor around the cable route.
OEM-04	RR-013; RR-021; RR-025; RR-028; RR-034; RR-036; RR-037; RR-040; RR-042; RR-054; RR-055; RR-061; RR-063; RR-067; RR-079; RR-089; RR-102; RR-103; RR-116; RR-121; RR-124; RR-131; RR-142; RR-149; RR-151; RR-153; RR-156; RR-157; RR-168; RR-170; RR-175; RR-191; RR-193; RR-194; RR-196; RR-202; RR-220; RR-222; RR-239; RR-240; RR-246; RR-247; RR-252; RR-257; RR-262; RR-263; RR-267; RR-268; RR-271; RR-275; RR-278; RR-301; RR-312; RR-329; RR-338; RR-340	Wellbeing	<p>Concern that there will be a loss of collective or personal wellbeing/mental health due to the Scheme.</p> <p>Some comments refer to a general loss of wellbeing/mental health due to the length of the construction period.</p> <p>Some comments refer to personal or collective increased stress due to the Scheme.</p>	<p>The Applicant seeks to assure the public that the only identified <b>significant</b> adverse effect on human health and wellbeing as a result of the Scheme is anticipated to be as a result of potential closures and traffic management measures on the Trent Valley Way and National Byways. This impact is assessed to be a short-to medium-term temporary moderate adverse during construction (see Table 18.15 and para. 18.7.62 of <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b>).</p> <p>No other significant adverse effects to human health and safety have been identified in the Environmental Statement, as summarised in Section 21.5 of <b>6.2.21 Environmental Statement - Chapter 21 Other Environmental Matters [APP-059]</b>. As such, it is not considered that the Scheme will have any significant adverse impact on personal health and wellbeing, including mental health, as a result of the Scheme.</p> <p>Mitigation measures to ensure safety, human health and wellbeing are maintained throughout the Scheme's construction period are secured through the following control documents:</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<ul style="list-style-type: none"> <li>• <b>6.3.10.1 Environmental Statement - Appendix 10.1 Flood Risk Assessment and Drainage Strategy Report [APP-089];</b></li> <li>• <b>6.3.14.2_A Environmental Statement - Appendix 14.2 Construction Traffic Management Plan Revision A [EN010132/EX1/WB6.3.14.2_A];</b></li> <li>• <b>6.3.14.3_A Environmental Statement - Appendix 14.3 Outline Public Rights of Way Management Plan Revision A [EN010132/EX1/WB6.3.14.3_A];</b></li> <li>• <b>7.1_A Outline Construction Environmental Management Plan Revision A [EN010132/EX1/WB7.1_A];</b> and</li> <li>• <b>7.9 Outline Battery Storage Safety Management Plan [APP-318].</b></li> </ul> <p>These control documents are secured by the relevant requirements in Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>. Schedule 2 furthermore secured control documents for the mitigation of operational and decommissioning impacts to health and wellbeing.</p> <p>Those identified effects and mitigation measures notwithstanding, the Scheme has sought to include measures to enhance health and wellbeing.</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p>One of these measures is the provision of a new permissive footpath to run from the Track off Sykes Lane along the Codder Lane Belt and then south and west to rejoin Sykes Lane opposite Hardwick Scrub. This permissive path will be in place during the operational phase of the Scheme, thus improving local amenity. This is assessed to provide a localised moderate-minor beneficial effect on recreational walking, creating a resultant effect on health and wellbeing (see para. 18.7.110 in <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b>).</p>
			<p>Some comments refer to a loss of wellbeing being a result of a loss of farmland.</p>	<p>The Applicant is cognisant of the significance of the countryside for physical and mental wellbeing and, as such, likely impacts on the desirability and use of recreational facilities in the countryside, such as public rights of way, have been assessed in Section 18.7 of <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b>. The greatest level of effect to access, desirability and use of recreational facilities is limited to short- to medium-term moderate adverse effects on long distance recreational routes (the Trent Valley Way and National Byways) during construction (see Table 18.15 and para. 18.7.62). This is a <b>significant adverse</b> effect. This is however the only significant adverse effect anticipated, with no greater than moderate-minor adverse</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p>anticipated to any other recreational receptor during construction (see paras. 18.7.60 to 18.7.69), or to any recreational receptor during operation (see paras. 18.7.107 to 18.7.117) and decommissioning (see paras. 18.7.147 to 18.7.157). These effects are not anticipated to be significant.</p> <p>This is re-iterated in Section 21.5 of <b>6.2.21 Environmental Statement - Chapter 21 Other Environmental Matters [APP-059]</b>.</p>
			<p>Some comments refer to an increase in anxiety due to construction vehicles and workers using single track road by the railway, as workers will be strangers and concern that they will be accessing land without permission.</p>	<p>An Outline Construction Traffic Management Plan (CTMP) has been prepared to support the application within <b>6.3.14.2_A Environmental Statement - Appendix 14.2 Construction Traffic Management Plan Revision A [EN010132/EX1/WB6.3.14.2_A]</b> which is secured through Requirement 15 in Schedule 2 of the <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p> <p>The outline CTMP submitted as part of the DCO application provides a framework for the management of construction vehicle movements to and from the Scheme, to ensure that the effects of the temporary construction phase on the local highway network and on the local community are minimised and made acceptable.</p>
			<p>Some comments refer to health departments encouraging green</p>	<p>The Applicant is cognisant of the significance of the countryside for physical and mental wellbeing and, as</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
			<p>spaces to help individuals, which would be lost due to this Scheme. Some comments refer to the holistic/ psychological benefits of green spaces which the Scheme will reduce.</p>	<p>such, likely impacts on the desirability and use of recreational facilities in the countryside, such as public rights of way, have been assessed in Section 18.7 of <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b>. It should be noted that no Public Rights of Way are to be permanently closed or rerouted as part of the Scheme, as detailed in <b>6.3.14.3_A Environmental Statement - Appendix 14.3 Outline Public Rights of Way Management Plan Revision A [EN010132/EX1/WB6.3.14.3_A]</b> which is secured by Requirement 18 of Schedule 2 to <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p> <p>The Applicant does however seek to clarify that the understanding of green spaces by Public Health England (in "Improving access to greenspace: A new review for 2020"), and Natural England (January 2023 Green Infrastructure Framework), does not include arable fields. As such, no publicly accessible green spaces, such as recreation grounds, woodland, or open access land is included in the Order Limits, and therefore would be "lost" due to the Scheme. The impact on the desirability and use of such spaces has been assessed in Section 18.7 of <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b> which demonstrates a no</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				greater than moderate-minor impact on children or youth recreation facilities (para. 18.7.69). As such, these impacts are not significant.
			Some comments refer to their being lives ruined just to reach constantly moving government targets.	Section 3.3 of document <b>7.11 Statement of Need [APP-320]</b> , specifically paragraphs 3.3.5 and 3.3.11, describes the Government's view that large capacities of low-carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that " <i>a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar</i> ". This support for large scale solar as part of the 'answer' to net zero and energy security has been repeated in its recent draft national policy statements EN-1 and EN-3 published in March 2023.

### 3.12 Principle of Development

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
PRI-01	RR-272	Argentine Salt Flats	Comment that lithium for storage will destroy the Argentine salt flats.	<p>Paragraph 5.4.7 of <b>7.10 Skills Supply Chain and Employment Plan [APP-319]</b> states that "Any procurement of supplies internationally will comply with both national and international law, and all policy and safety measures will be adhered to in the transportation of supplies."</p> <p>A Skills, Supply Chain and Employment Plan is secured through Requirement 20 in Schedule 2 of the <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p>
PRI-02	RR-250	Benefits of the Scheme	Comment that the Scheme will cause harm to the environment and benefits of the Scheme are questionable.	<p>Section 6.2 of <b>7.5 Planning Statement [APP-313]</b> sets out how the Scheme will meet the compelling need for renewable energy in accordance with relevant national planning policies. In summary, the Scheme would:</p> <ul style="list-style-type: none"> <li>• Deliver a large amount of renewable generation capacity (21,956,988 MWh over the estimated 40-year assessed lifetime) to deliver the Government's energy objectives and legally binding net zero commitments in line with the requirements of paragraph 1.1.1 of NPS EN-3, paragraph 3.3.20 of draft NPS EN-1, section 3.4 of NPS EN-1 and the National Infrastructure Strategy 2020 (para. 6.2.25);</li> </ul>



Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<ul style="list-style-type: none"> <li>• Deliver a reduction of 3,981,049 tCO<sub>2</sub>e over the lifetime of the Scheme compared to if it did not go ahead which would make a significant contribution towards reducing carbon emissions as required by paragraph 1.1.1 of NPS EN-1, paragraph 2.3.3 of Draft NPS EN-1, the National Infrastructure Strategy 2020 and the Energy White Paper: "Powering our net zero future" (para. 6.2.25);</li> <li>• Deliver in a timescale that is short in the context of the delivery of other forms of energy generation in line with the urgent need to decarbonise set out in paragraphs 3.3.5, 3.3.15 and 3.4.5 of NPS EN-1, Paragraph 2.3.3 of Draft NPS EN-1 and the National Infrastructure Strategy 2020 (paras. 6.2.25);</li> <li>• Enable all consumers to benefit from the effect of low-marginal cost solar generation by reducing market prices, in line with the aim to provide affordable energy for consumers set out at Paragraph 2.3.3, Paragraph 2.3.6 and 3.3.20 of Draft NPS EN-1 (para 6.2.25); and</li> <li>• Help ensure security and reliability of energy supply in line with Paragraph 2.3.3 and 2.3.6 of the Draft NPS EN-1 (para 6.2.25).</li> </ul> <p>Whilst it has not been possible for the Scheme to avoid all significant residual adverse impacts, these have been identified within the <b>Environmental Statement [APP-</b></p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<b>039 to APP-061]</b> and have been minimised, where possible, through careful and sensitive design and detailed mitigation strategies.
PRI-03	RR-075; RR-124; RR-139; RR-220; RR-247; RR-273; RR-284; RR-316	CCTV	<p>Concern that CCTV and associated works will be installed around the site and on nearby roads.</p> <p>Some comments refer to the lack of privacy as a result of the CCTV installed.</p> <p>Some comments refer to the visual impact of CCTV and associated works.</p> <p>One comment referred to CCTV in congruence with perimeter lights and fencing as a concentration camp.</p>	<p>The Applicant recognises the symbiotic relationship between safety and security. The security arrangements at the Sites will therefore contribute to the overall safety of all who will, or may, enter the Sites. The security arrangements will be Suitably Qualified and Experienced Personnel reviewed at identified times commensurate to the Security Risk rating and will further assess any changes in the Security Risk Management Threat Assessment.</p> <p>The security features that are proposed as part of the Scheme are set out within Section 4.5 of <b>6.2.4 Environmental Statement Chapter 4 Scheme Description [APP-042]</b> and set out in Section 2.8 of <b>7.14_A Outline Operational Environmental Management Plan Revision A [EN010132/EX1/WB7.14_A]</b> (as secured by Requirement 14 of Schedule 2 in <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>):</p> <ul style="list-style-type: none"> <li>Detection systems such as beam break, image detection etc. to raise alarm when fence breached;</li> </ul>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<ul style="list-style-type: none"> <li>• Audio announcement when intruder detected to warn alarm triggered and police on way;</li> <li>• Barriers/locked gates at main entrances to the Sites;</li> <li>• Steel doors on substation buildings;</li> <li>• Buried cables as much as possible;</li> <li>• Remote monitoring; and</li> <li>• Alarm response contract with keyholder/security company</li> </ul> <p>For the solar arrays there will be a maximum of 2.5m high deer wire mesh fencing, 3m high maximum pole mounted CCTV systems. The substations and BESS is proposed to have palisade fencing which is a maximum height of 2.6m (see paragraphs 4.5.57 to 4.5.60 of <b>6.2.4 Environmental Statement - Chapter 4 Scheme Description [APP-042]</b>).</p> <p>As per paragraph 4.5.61 <b>[APP-042]</b>, <i>“Lighting is not required within the solar arrays. Lighting will be provided within substations and within the Energy Storage site to be used only in the event of it being required for maintenance and security purposes. Down lighting would be used on lighting columns of a maximum height of 3m.”</i></p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
PRI-04	RR-112	Compulsory Purchase Acquisition	Concern that the land for the Scheme being procured via compulsory purchase.	Where the Applicant is seeking powers of compulsory acquisition such as along the cable route, the Applicant's preference is to negotiate the acquisition of land and / or interests in land and enter into voluntary agreement with the landowner.. The Applicant is seeking compulsory acquisition powers in the <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> to enable the Scheme to be delivered. <b>4.1 Statement of Reasons: Compulsory Acquisition Information [APP-019]</b> sets out the reasons why the powers sought over land are necessary and proportionate to deliver the Scheme. Wherever possible, the Applicant is seeking to enter voluntary agreements with landowners and only where this is not possible will powers of compulsory acquisition be exercised.
PRI-05	RR-102; RR-262; RR-285; RR-294; RR-325; RR-343	Construction	Concern that construction will cause damage and pollution, in the forms of dirt, dust, and chemicals.	<b>6.2.17 Environmental Statement - Chapter 17 Air Quality [APP-055]</b> includes a full and detailed assessment that deals with air quality impact and effect at nearby sensitive receptors during construction, operation and decommissioning phases. The assessment concluded that there are not any likely significant effects on air quality as a result of the Scheme.

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p>Following the implementation of the appropriate site-specific mitigation measures, which are set out in <b>7.1_A Outline Construction Environmental Management Plan Revision A [EN010132/EX1/WB7.1_A]</b> which is secured through Schedule 2, Requirement 13 of the <b>3.1 dDCO [EN010132/EX1/WB3.1_A]</b>, the significance of the effects from dust and PM<sub>10</sub> emissions associated with the construction works is considered to be 'negligible' at all receptors, which is 'not significant' in EIA terms. This is based on the IAQM Guidance.</p>
			<p>Some comments refer to the disruption and carbon impact of construction.</p>	<p><b>6.2.7_A Environmental Statement - Chapter 7 Climate Change Revision A [EN010132/EX1/WB6.2.7_A]</b> contains a detailed assessment of carbon emissions during the construction phase.</p> <p>An Outline Construction Traffic Management Plan (CTMP) has been prepared to support the application within <b>6.3.14.2_A Environmental Statement - Appendix 14.2 Construction Traffic Management Plan Revision A [EN010132/EX1/WB6.3.14.2_A]</b> which is secured through Requirement 15 in Schedule 2 of the <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p> <p>The outline CTMP submitted as part of the DCO application provides a framework for the management of construction vehicle movements to and from the</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				Scheme, to ensure that the effects of the temporary construction phase on the local highway network are minimised and the movement of equipment is efficient.
			Some comments refer to ambiguity of the construction time length.	As noted by Table 4.6 and paragraph 4.6.1 of <b>6.2.4 Environmental Statement - Chapter 4 Scheme Description [APP-042]</b> , <i>"the construction programme for the entire Scheme is anticipated to be 24 months with the potential likelihood of overlapping construction works on the different Scheme Sites."</i>
			Some comments refer to construction impacts in a general manner.	Environmental impacts resulting from construction have been assessed in each of the constituent technical chapters in the <b>Environmental Statement [APP-039 to APP-061]</b> . Those effects assessed as being significant are summarised in <b>6.2.23_A Environmental Statement - Chapter 23 Summary of Significant Effects Revision A [EN010132/EX1/WB6.2.23_A]</b> . Where mitigation or enhancement measures to avoid or reduce construction impacts are proposed, these are set out in <b>7.1_A Outline Construction Environmental Management Plan Revision A [EN010132/EX1/WB7.1_A]</b> the contents of which are secured through Requirement 13 in Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> .

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
PRI-06	RR-088; RR-108; RR-132; RR-276; RR-302	Cost benefit of the Scheme	Concern that the Scheme will not generate a profit in comparison to its cost.	<p>Section 3.3 of document <b>7.11 Statement of Need [APP-320]</b>, specifically paragraphs 3.3.5 and 3.3.11, describes the Government's view that large capacities of low-carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar". This support for large scale solar as part of the 'answer' to net zero and energy security has been repeated in the draft national policy statements EN-1 and EN-3, published in March 2023.</p> <p>Figure 10.3 of <b>7.11 Statement of Need [APP-320]</b> shows that solar is already a leading low-cost generation technology in the UK. Figure 10.4 of <b>7.11 Statement of Need [APP-320]</b> shows the Government's view that the cost of solar generation will continue to reduce in the future and will remain among the lowest cost generation available to the UK over the time period shown in the Figure.</p>
			Some comments refer to sourcing from China to be included into the carbon neutrality and financial analysis of this proposed Scheme.	<p>The Applicant notes this comment and refers the Party to paragraph 7.5.4 of <b>6.2.7_A Environmental Statement - Chapter 7 Climate Change Revision A [EN010132/EX1/WB6.2.7_A]</b> where it is anticipated that the PV panels will be sourced from China or a country of similar distance from the UK. Therefore, the</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				Applicant has noted and accounted for the sourcing of panels within its assessment and that the manufacture and transport of products will likely be the largest sources of GHG emissions from the Scheme.
PRI-07	RR-003; RR-004; RR-005; RR-010; RR-011; RR-015; RR-016; RR-019; RR-020; RR-021; RR-022; RR-034; RR-037; RR-040; RR-042; RR-045; RR-053; RR-054; RR-055; RR-062; RR-063; RR-065; RR-066; RR-067; RR-072; RR-075; RR-078; RR-079; RR-082; RR-083; RR-086; RR-095; RR-097; RR-098; RR-100; RR-102; RR-106; RR-107; RR-110; RR-115; RR-121; RR-129; RR-130; RR-131; RR-133; RR-139; RR-146; RR-152; RR-153; RR-154; RR-155; RR-156; RR-157; RR-161; RR-164; RR-165; RR-168; RR-174; RR-175; RR-183; RR-187; RR-192; RR-194; RR-202; RR-205; RR-210;	Cumulative Impact	<p>Opposition to the Scheme due to the cumulative impact of solar Schemes in the same area.</p> <p>Some comments cite this as being a total of 10,000 acres of development.</p> <p>Some comments refer to the four sites in close proximity to one another creating the largest solar farm in Europe.</p>	<p>A cumulative effects assessment has been prepared for the Application within the <b>Environmental Statement [APP-039 to APP-061]</b>. Cumulative effects assessments for each environmental topic are set out in each of the ES Chapters and include the assessment of the impacts of the Scheme cumulatively with other identified NSIPs in the local area (see paragraph 2.5.9 of <b>6.2.2 Environmental Statement - Chapter 2 EIA Process and Methodology [APP-040]</b>).</p> <p>This assessment has been carried out in accordance with Schedule 4 of the 2017 EIA Regulations and PINS Advice Note 17. The mitigation measures set out across the ES therefore account for anticipated cumulative effects.</p> <p>A cumulative effects assessment has been prepared for the Application within the <b>Environmental Statement [APP-039 to APP-061]</b>. Cumulative effects assessments for each topic are set out in each of the ES Chapters and include the assessment of the impacts of the Scheme cumulatively with other identified NSIPs in the local area (see paragraph 2.5.9 of <b>6.2.2 Environmental</b></p>



Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
	RR-211; RR-212; RR-217; RR-220; RR-222; RR-223; RR-235; RR-239; RR-242; RR-244; RR-247; RR-251; RR-252; RR-257; RR-260; RR-262; RR-265; RR-267; RR-268; RR-270; RR-271; RR-272; RR-274; RR-278; RR-282; RR-286; RR-287; RR-290; RR-294; RR-301; RR-303; RR-305; RR-306; RR-307; RR-311; RR-312; RR-313; RR-314; RR-315; RR-323; RR-325; RR-327; RR-334; RR-338; RR-339; RR-343; RR-345			<p><b>Statement - Chapter 2 EIA Process and Methodology [APP-040].</b></p> <p>This assessment has been carried out in accordance with Schedule 4 of the 2017 EIA Regulations and PINS Advice Note 17. The mitigation measures set out across the ES therefore account for anticipated cumulative effects.</p>
			<p>Some comments question whether the scale of development in Lincolnshire is proportionate compared to the rest of the UK.</p> <p>Some comments refer to an excessive concentration of solar panels in one specific area.</p>	<p>The Applicant notes this comment.</p>
			<p>Some comments refer to the number of communities affected by the Schemes.</p>	<p>A cumulative effects assessment has been prepared for the Application within the <b>Environmental Statement [APP-039 to APP-061]</b>. Cumulative effects assessments for each topic are set out in each of the ES Chapters and include the assessment of the impacts of the Scheme cumulatively with other identified NSIPs in the local area (see paragraph 2.5.9 of <b>6.2.2 Environmental Statement - Chapter 2 EIA Process and Methodology [APP-040]</b>)</p> <p>This assessment has been carried out in accordance with Schedule 4 of the 2017 EIA Regulations and PINS</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				Advice Note 17. The mitigation measures set out across the ES therefore account for anticipated cumulative effects.
			Some comments refer to the multiple Schemes multiplying the detrimental impacts on the local area.	<p>A cumulative effects assessment has been prepared for the Application within the <b>Environmental Statement [APP-039 to APP-061]</b>. Cumulative effects assessments for each topic are set out in each of the ES Chapters and include the assessment of the impacts of the Scheme cumulatively with other identified NSIPs in the local area (see paragraph 2.5.9 of <b>6.2.2 Environmental Statement - Chapter 2 EIA Process and Methodology [APP-040]</b>)</p> <p>This assessment has been carried out in accordance with Schedule 4 of the 2017 EIA Regulations and PINS Advice Note 17. The mitigation measures set out across the ES therefore account for anticipated cumulative effects.</p>
			Some comments refer to the cumulative impact of multiple Schemes on flora and fauna in the local area.	Section 9.9 of <b>6.2.9 Environmental Statement - Chapter 9 Ecology and Biodiversity [APP-047]</b> assesses the potential for cumulative effects on ecology arising from the combined impacts of similar large-scale development in proximity to the Scheme.
			Some comments refer to balancing the effect of the large	Section 4.6 of <b>7.5 Planning Statement [APP-313]</b> details the 'Other Benefits of the Scheme', beyond the

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			Schemes with what the communities need.	<p>national benefits as described through Sections 4.2 to 4.5 <b>[APP-313]</b>.</p> <p>Paragraph 4.6.1 of <b>7.5 Planning Statement [APP-313]</b> states that the Scheme will result in a significant Net Gain for biodiversity (86.80% in habitat units, 54.71% in hedgerow units and 33.25% in river units). This is secured through Requirement 9 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>, which states that "No part of the authorised development may commence until a biodiversity net gain strategy has been submitted to and approved by the relevant planning authority, in consultation with the relevant statutory nature conservation body."</p> <p>Paragraph 4.6.1 <b>[APP-313]</b> goes on to explain that a new permissive footpath to run from Track off Sykes Lane along the Codder Lane Belt and then south and west to rejoin Sykes Lane opposite Hardwick Scrub will be in place during the operational phase of the Scheme, thus improving local amenity.</p> <p>Paragraph 4.6.1 <b>[APP-313]</b> goes on to explain that a Skills, Supply Chain and Employment Plan, as secured by Requirement 20 in Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>, will be in place prior to construction and will set out the measures that the</p>

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				<p>Applicant will implement to advertise and promote employment and training opportunities associated with the Scheme in construction and operation locally.</p> <p>Whilst not a part of the DCO Application, paragraph 4.8.1 [APP-313] explains that the Applicant is committed to providing a Community Benefit Fund.</p>
PRI-08	RR-004; RR-010; RR-020; RR-021; RR-022; RR-028; RR-034; RR-040; RR-054; RR-075; RR-079; RR-102; RR-116; RR-119; RR-136; RR-148; RR-156; RR-158; RR-161; RR-189; RR-192; RR-193; RR-194; RR-199; RR-202; RR-205; RR-210; RR-215; RR-220; RR-222; RR-225; RR-252; RR-255; RR-257; RR-264; RR-267; RR-268; RR-269; RR-271; RR-274; RR-278; RR-280; RR-284; RR-285; RR-287; RR-290; RR-293; RR-294; RR-303; RR-307; RR-312;	Developer Motives	Comments that the Applicant has motives to develop the Scheme that negatively impact the local community.	<p>Section 6.2 of <b>7.5 Planning Statement [APP-313]</b> sets out how the Scheme will meet the compelling need for renewable energy in accordance with relevant national planning policies. In summary, the Scheme would:</p> <ul style="list-style-type: none"> <li>• Deliver a large amount of renewable generation capacity (21,956,988 MWh over the estimated 40-year assessed lifetime) to deliver the Government's energy objectives and legally binding net zero commitments in line with the requirements of paragraph 1.1.1 of NPS EN-3, paragraph 3.3.20 of draft NPS EN-1, section 3.4 of NPS EN-1 and the National Infrastructure Strategy 2020 (para. 6.2.25);</li> <li>• Deliver a reduction of 3,981,049 tCO<sub>2</sub>e over the lifetime of the Scheme compared to if it did not go ahead which would make a significant contribution towards reducing carbon emissions as required by paragraph 1.1.1 of NPS EN-1, paragraph 2.3.3 of Draft NPS EN-1, the National Infrastructure Strategy</li> </ul>

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	RR-325; RR-334; RR-343; RR-346			<p>2020 and the Energy White Paper: "Powering our net zero future" (para. 6.2.25);</p> <ul style="list-style-type: none"> <li>• Deliver in a timescale that is short in the context of the delivery of other forms of energy generation in line with the urgent need to decarbonise set out in paragraphs 3.3.5, 3.3.15 and 3.4.5 of NPS EN-1, Paragraph 2.3.3 of Draft NPS EN-1 and the National Infrastructure Strategy 2020 (paras. 6.2.25);</li> <li>• Enable all consumers to benefit from the effect of low-marginal cost solar generation by reducing market prices, in line with the aim to provide affordable energy for consumers set out at Paragraph 2.3.3, Paragraph 2.3.6 and 3.3.20 of Draft NPS EN-1 (para 6.2.25); and</li> <li>• Help ensure security and reliability of energy supply in line with Paragraph 2.3.3 and 2.3.6 of the Draft NPS EN-1 (para 6.2.25).</li> </ul> <p>Whilst it has not been possible for the Scheme to avoid all significant residual adverse impacts, these have been identified within the <b>Environmental Statement [APP-039 to APP-061]</b> and have been minimised, where possible, through careful and sensitive design and detailed mitigation strategies.</p>
			Some comments refer to the Scheme being designed to suit the	Section 4.6 of <b>7.5 Planning Statement [APP-313]</b> details the 'Other Benefits of the Scheme', beyond the

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			<p>commercial interests and profits for the Applicant and shareholders, and the community lose out.</p> <p>Some comments refer to the community and the residential villages suffering greatly from this commercial interest and that there are no community benefits to the Scheme.</p>	<p>national benefits as described through Sections 4.2 to 4.5 <b>[APP-313]</b>.</p> <p>Paragraph 4.6.1 <b>[APP-313]</b> states that the Scheme will result in a significant Net Gain for biodiversity (86.80% gains provided in habitat, 54.71% gains in hedgerow and 33.25% gains in river units).</p> <p>The Applicant has also been in discussions with Saxilby Nature Project to agree inclusion of habitat management land for community use in the DCO application.</p> <p>A total of 0.8ha of land has been set aside as a habitat management area (Work No.10 in Schedule 1 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>). This area has been set aside to assure it aligns with the objectives of Saxilby Nature Project and their neighbouring Hardwick Scrub site (see para. 4.5.90 of <b>6.2.4 Environmental Statement - Chapter 4 Scheme Description [APP-042]</b>).</p> <p>Any financial contributions towards the use of this land by Saxilby Nature Project will be agreed outside the scope of the DCO through the Community Benefit Fund, as described in paragraph 4.8.1 of <b>7.5 Planning Statement [APP-313]</b>.</p>

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				<p>Paragraph 4.6.1 <b>[APP-313]</b> goes on to explain that a new permissive path from Track off Sykes Lane along the Codder Lane Belt and then south and west to rejoin Sykes Lane opposite Hardwick Scrub will be in place during the operational phase of the Scheme, thus improving local amenity.</p> <p>Paragraph 4.6.1 <b>[APP-313]</b> explains that a Skills, Supply Chain and Employment Plan, as secured through Requirement 20 in Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>, will be in place prior to construction and will set out the measures that the Applicant will implement to advertise and promote employment and training opportunities associated with the Scheme in construction and operation locally.</p> <p>Separately to the Application, the Applicant is committed to providing a Community Benefit Fund (see paragraph 4.8.1 of <b>7.5 Planning Statement [APP-313]</b>). This fund will be available for community-based benefits such as (but not limited to) community-led energy related projects.</p> <p>The Scheme is anticipated to bring direct, indirect, and induced employment and economic benefits to the Local and Regional Impact Area, as set out in Section 18.7, 18.8, and 18.10 of <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism</b></p>

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				<p><b>and Recreation [APP-056].</b> The net changes to employment, and to economic Gross Value Added in the local area (defined as West Lindsey and Bassetlaw districts) are:</p> <ul style="list-style-type: none"> <li>• For construction: +432 FTE jobs (para. 18.7.21), +£20.0 million per year (para. 18.7.52);</li> <li>• For operation: -2 FTE jobs (para. 18.7.81), +£1.5million per year (para. 18.7.99);</li> <li>• For decommissioning: +324 FTE jobs (para. 18.7.129), minor beneficial impact to GVA (para. 18.7.139).</li> </ul>
			Some comments refer to the Applicant stealing land and properties for the development.	The landowners hosting solar panels within the Scheme have entered into voluntary agreements with the Applicant to lease their land, and their freehold ownership is retained.
			Some comments refer to the lack of community benefit in relation to lower electricity bills, as the electricity is being supplied straight to the grid.	Section 10.2 of <b>7.11 Statement of Need [APP-320]</b> describes how the deployment of solar generation assets is anticipated to reduce the traded price of power in the UK, and therefore result in economic benefits by lowering the costs of power within the UK energy system.
			Some comments that the land has been chosen based on the interest	The selection of the Scheme's location has followed a five-stage systematic step-by-step process where as set



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			<p>of the Applicant and suitability reasons, and not on merit.</p> <p>Some comments refer to the location of the Scheme being decided on a basis of what land can be purchased in bulk, regardless of surroundings.</p>	<p>out in <b>6.3.5.1_A Environmental Statement - Appendix 5.1 Site Selection Assessment Revision A [AS-004]</b>:</p> <ul style="list-style-type: none"> <li>• Stage 1 - Identification of the Area of Search (see para. 2.1.6);</li> <li>• Stage 2 - Exclusion of Planning, Environmental and Spatial Constraints (see para. 2.1.12);</li> <li>• Stage 3 - Identifying Potential Solar Development Areas (see 2.1.17);</li> <li>• Stage 4 - Evaluation of Potential Solar Development Areas (see 2.1.34); and</li> <li>• Stage 5 - Widening the Search to consider Grade 3 agricultural land (see 2.1.38).</li> </ul>
			<p>Some comments refer to the Applicant committing to a breach of human rights.</p>	<p>The Applicant respectfully refutes this statement, as at no point has there been any commitment or intention to breach the human rights of any person or population group.</p> <p>Paragraph 7.3.1 and 7.3.2 of <b>7.10 Outline Skills Supply Chain and Employment Plan [APP-319]</b> sets out information on the safeguarding measures taken to prevent human rights abuses in the supply chain for the Scheme.</p> <p>Paragraph 5.4.7 of the <b>Outline Plan [APP-319]</b> states that <i>"Any procurement of supplies internationally will comply with both national and international law, and all</i></p>

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				<i>policy and safety measures will be adhered to in the transportation of supplies."</i>
			Some comments refer to the Applicant potentially taking the money and running, as Toucan Energy did.	The Applicant is not related to Toucan Energy. In section 2.1 of <b>4.2 Funding Statement [APP-020]</b> the ownership and expertise of Foresight Island GP Solar Portfolio Limited (FIGP) is explained further. The origin of the Applicant is not a planning matter.
			Some comments refer to the undemocratic nature of the planning process/ bypassing of local authority.	As stated in paragraph 5.2.2 of <b>7.5 Planning Statement [APP-313]</b> , the Scheme is defined as an "nationally significant infrastructure project" (NSIP) under Sections 14(1)(a), 15(1) and 15(2) of the Planning Act 2008.  As such, under Section 103 of the Planning Act 2008, the Secretary of State is the decision maker on an application for an order granting development consent, rather than the local planning authority.  That notwithstanding, "Advice Note two: The role of local authorities in the development consent process" as published in February 2015 by the Planning Inspectorate (Version 1) details the statutory role of local authorities within the DCO application process. "The role of local authorities" table set out in Section 1 of this advice note summarises these roles by the stage of an application.

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				<p>At this time and as per Section 60 (2) of the Planning Act 2008, the Secretary of State must give notice in writing to the host local authorities to invite them to submit a local impact report, where an application for an order granting development consent has been accepted. "Advice Note One: Local Impact Reports" which was republished in April 2012 on the Planning Inspectorate's website notes the importance of Local Impact Reports and that "in coming to a decision, the Secretary of State must have regard to any LIRs that are submitted by the deadline".</p>
			<p>Some comments refer to developer greed by overshooting for too much land and eventually having to compromise.</p>	<p>As per paragraph 2.1.10 of <b>6.3.5.1_A Environmental Statement - Appendix 5.1 Site Selection Assessment Revision A [AS-004]</b>, "a land area of approximately 75ha of solar panels and associated infrastructure (up to 100ha including landscaping and ecology mitigation land) is ideal to provide an NSIP solar scheme of 50MW. For a grid connection of 480MW, a site size of approximately 960 ha (excluding cable route) was preferred. The Applicant generally seeks to find a site which is around 10% larger than is needed for the grid connection offer (up to 1100 ha). This larger site size allows flexibility for the accommodation of additional mitigation measures and other constraints that may become known through the design development process."</p>

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				<p>The landscape mitigation measures are shown on <b>EN010132/EX1/WB6.4.8.18.1-</b> to <b>EN010132/EX1/WB6.4.8.18.3</b> Figures 8.18.1-A to 8.18.3-A Landscape and Ecology Mitigation and Enhancement Plans [<b>WB6.4.8.18.1_A</b> to <b>WB6.4.8.18.3_A</b>].</p> <p>Please also refer to <b>EN010132/EX1/WB7.3-A Outline Landscape and Ecological Management Plan [EN010132/EX1/WB7.3_A]</b> which is secured by Requirement 7 in Schedule 2 of 3.1_A Draft Development Consent Order Revision A [<b>EN010132/EX1/WB3.1_A</b>].</p>
PRI-09	RR-021; RR-053; RR-054; RR-059; RR-070; RR-072; RR-075; RR-079; RR-083; RR-088; RR-095; RR-102; RR-106; RR-108; RR-110; RR-115; RR-129; RR-132; RR-142; RR-151; RR-152; RR-155; RR-156; RR-157; RR-168; RR-186; RR-194; RR-202; RR-205; RR-210; RR-220; RR-257; RR-268; RR-276; RR-338	Ethical sourcing	<p>Comment that the sourcing of manufactured materials for the Scheme raises ethical and moral concerns.</p> <p>Some comments refer to sourcing from China/Xinjiang as an issue.</p> <p>Some comments refer to media articles substantiating moral and ethical concerns.</p> <p>Some comments refer to raw materials being sourced from the Congo, which raises ethical issues.</p>	<p>Paragraph 7.3.1 of <b>7.10 Skills Supply Chain and Employment Plan [APP-319]</b> confirms that the Applicant is a signatory of the UK Industry Supply Chain which states <i>"We, members of the UK solar energy industry, condemn and oppose any abuse of human rights, including forced labour, anywhere in the global supply chain. We support applying the highest possible levels of transparency and sustainability throughout the value chain, and commit to the development of an industry-led traceability protocol to help to ensure our supply chain is free of human rights abuses."</i></p> <p>The Applicant refers the Party to paragraph 7.5.4 of <b>6.2.7_A Environmental Statement - Chapter 7 Climate Change Revision A</b></p>

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			<p>Some comments refer to the carbon offset of sourcing materials from abroad.</p> <p>Some comments refer to the precious materials needed to produce the panels.</p> <p>Some comments refer to a lack of clarity from the Applicant in regard to where the panels will be designed and manufactured.</p> <p>Some comments refer to the environmental impact of using silica sand for panel build.</p>	<p><b>[EN010132/EX1/WB6.2.7_A]</b> which states that it is anticipated that the PV panels will be sourced from China or a country of similar distance from the UK. Therefore, the Applicant has noted and accounted for the sourcing of panels within its assessment and that the manufacture and transport of products will likely be the largest sources of GHG emissions from the Scheme.</p> <p>Paragraph 5.4.7 of <b>[APP-319]</b> states that "Any procurement of supplies internationally will comply with both national and international law, and all policy and safety measures will be adhered to in the transportation of supplies."</p> <p>The detailed Skills, Supply Chain and Employment Plan is secured through Requirement 20 in Schedule 2 of the <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p> <p>The Applicant notes the comment regarding the use of silica to produce panels. The embodied carbon of the production of mono-crystalline silicon for use in the PV panels has been included in the assessment in paragraph 7.8.12 of <b>6.2.7 Environmental Statement – Chapter 7 Climate Change [APP-045]</b>.</p>
PRI-10	RR-021; RR-053; RR-060; RR-088; RR-115; RR-156; RR-157; RR-175; RR-211; RR-222; RR-254; RR-262;	Grid connection	Comment that the grid connection, by crossing the River Trent, will cause issues.	The Applicant notes the described parameters of the Horizontal Directional Drilling (HDD) across the River Trent, where the maximum depth of HDD has been set out at 25m (see para. 4.5.44 of <b>6.2.4 Environmental</b>

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	RR-303; RR-312; RR-315; RR-339		Some comments refer to the environmental damage cabling infrastructure will cause.	<p><b>Statement - Chapter 4 Scheme Description [APP-042]).</b></p> <p>As explained within paragraph 4.5.44 [APP-042], the maximum HDD depth of 25m below ground level has taken account of the water surface level being up to 6 metres below the river bank level; the surface water level being up to 5 metres deep to the silt level and the silt level likely being 1 metre deep before the river bed level. With the average depths for a HDD being 3m below the river bed level this leads to an assumed HDD at 15 meters below river bank level. The maximum HDD depth of 25 metres below ground level is considered to offer some flexibility to account for variation in depths. It has been agreed with the Canal and River Trust that the HDD will be a minimum of 5m below the river bed. This will be secured via an amendment to Requirement 5 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p> <p>Notwithstanding the above and in noting the Applicant's precautionary approach in relation to the potential for sediment release, as detailed within paragraphs 8.2.1 to 8.2.4 of <b>7.17 Outline Ecological Protection and Mitigation Strategy [APP-326]</b>, the Applicant confirms that the working parameters around crossing the River Trent will depend on the results of</p>

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				<p>ground investigations which will inform the detailed design process.</p> <p>The results of the proposed survey and ground investigations will be reviewed by an ecologist to ensure that they are appropriate for the minimisation of potential disturbance to riparian wildlife. Furthermore, the exact siting of the proposed cable installation (specifically, the entry and exit pits and riverbank beneath the crossing line) will be inspected for the potential presence of protected species, such as otter, water vole and nesting birds, as set out in Section 7 of <b>7.19 Outline Ecological Protection and Mitigation Strategy [APP-326]</b>.</p> <p>The Outline Strategy is secured through Requirement 8 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p>
			<p>Some comments question why the site requires a grid connection, claiming that it should instead be placed on the side of the River Trent near the power stations.</p>	<p>The selection of the Scheme's location has followed a five-stage systematic step-by-step process where as set out in <b>6.3.5.1_A Environmental Statement - Appendix 5.1 Site Selection Assessment Revision A [AS-004]</b>:</p> <p>Stage 1 - Identification of the Area of Search (see para. 2.1.6);</p> <p>Stage 2 - Exclusion of Planning, Environmental and Spatial Constraints (see para. 2.1.12);</p>

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				<p>Stage 3 - Identifying Potential Solar Development Areas (see 2.1.17);</p> <p>Stage 4 - Evaluation of Potential Solar Development Areas (see 2.1.34); and</p> <p>Stage 5 - Widening the Search to consider Grade 3 agricultural land (see 2.1.38).</p> <p>Resultingly, as concluded through paragraph 4.1.8 of <b>[AS-004]</b>, it is considered that there are no obviously more suitable locations within the area of search than the proposed Sites for the Scheme.</p>
			<p>Some comments refer to the cable route crossing an area designated as an 'opportunity for ecological improvement' on the biodiversity mapping for this area, which was drawn up by the County Council. Consequential concern that the Scheme goes against the vision that West Lindsey District Council set out for this area in their Green Strategy document.</p>	<p>It is acknowledged that the cable installation route crosses the Biodiversity Opportunity Area (BOA) identified by the Greater Lincolnshire Nature Partnership. These areas are identified not for their current biodiversity value but because they occupy land which is suitable for creating ecological links between other, known locations of valuable ecological habitat. The cable installation works would represent a temporary impact on a largely arable system of low inherent ecological value and any disturbed or removed habitat would be re-seeded or replanted as set out in the <b>7.3_A Outline Landscape and Ecological Management Plan Revision A [EN010132/EX1/WB7.3_A]</b> (a detailed LEMP is secured through Requirement 7 in Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A</b></p>



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				<p>[EN010132/EX1/WB3.1_A]), in order to ensure no long-term impact occurs.</p>
			<p>Some comments raise concern regarding the extent of extra infrastructure required due to the length of the cable route to the grid connection at the power stations.</p>	<p><b>6.2.5 Environmental Statement – Chapter 5 Alternatives and Design Evolution [APP-043]</b> and its associated <b>6.3.5.1_A Environmental Statement – Appendix 5.1 Site Selection Assessment Revision A [AS-004]</b> describes the site selection process that has determined the siting of the Scheme, which has necessitated the length of the cable route required to facilitate this. A description of the infrastructure that is required on the cable route is set out in paragraphs 4.5.40-4.5.56 of <b>6.2.4 Environmental Statement – Chapter 4 Scheme Description [APP-042]</b>. The environmental impacts of the extent of works required to facilitate the Scheme have been assessed in each of the relevant topics in the <b>Environmental Statement [APP-039 to APP-061]</b>.</p>
			<p>Some comments refer to the land chosen and the associated cable routes as being deliberate to avoid each parcel of land falling within local planning.</p>	<p>The Applicant is unclear as to what the Party means by <i>“the land chosen and the associated cable routes as being deliberate to avoid each parcel of land falling within local planning”</i>. If by this the Party means to say that the Application is purposefully not being determined by the local authorities, then the Applicant points to paragraph 4.2.1 of <b>6.2.4 Environmental Statement – Chapter 4 Scheme Description [APP-042]</b> where it outlines that the Scheme is defined as a “nationally significant</p>

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				infrastructure project" (NSIP) under Sections 14(1)(a) and 15(2) of the Planning Act 2008, meaning that (in accordance with section 103 of the 2008 Act) the application must be determined by the Secretary of State rather than the local planning authority.
			Some comments refer to other buried services e.g. gas pipes that need to be protected.	<p>The Applicant notes this comment, and is committed to consultation and reaching agreement with operators and/or owners of utility infrastructure that is likely to be directly impacted by the location or design of the Scheme.</p> <p>The Applicant has included protective provisions for the protection of various statutory undertakers within Schedule 16 to the <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p>
PRI-11	RR-317	Neutral opinion of Scheme	Comment stating no objection to the Scheme overall.	The Applicant notes this comment.
PRI-12	RR-303	Other Schemes being developed	Concern that Scheme acceptance will create a 'piggy back' situation whereby other developers will plan schemes in the area knowing they will be accepted.	Decisions made on the acceptability of this Scheme, nearby nationally significant infrastructure projects, and other solar development that may come forward will be made based on the merits of each individual development, taking account of cumulative effects from previous and concurrent developments. As such, the approval of this Scheme would not therefore set a principle or precedent for decisions on any future solar developments.

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PRI-13	RR-185	Principle of Scheme	Comment that the Scheme is a quick fix and short-sighted, and is not a long term solution.	<p>Section 3.3 of document <b>7.11 Statement of Need [APP-350]</b>, specifically paragraphs 3.3.5 and 3.3.11, describes the Government's view that large capacities of low-carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar".</p> <p>Furthermore, the Government has identified the need for "sustained growth in the capacity of onshore wind and solar in the next decade" (Paragraph 3.3.8 <b>[APP-320]</b>). Figure 7.1 <b>[APP-320]</b> shows National Grid Electricity System Operator's projections of the capacity of solar generation required to deliver a net-zero consistent system, which, as stated in para. 7.2.10, are 25 – 42GW by 2030, and 57 – 92GW by 2050, compared to just 14GW today (Section 7.2).</p>
PRI-14	RR-248; RR-339	Scheme feasibility	<p>Concern that the Scheme is not a proven venture.</p> <p>Some comments refer to the Schemes in the area being rushed through application without knowing their effectiveness, which may be too late for soil quality to return to agricultural use.</p>	<p>Section 3.3 of document <b>7.11 Statement of Need [APP-320]</b>, specifically paragraphs 3.3.5 and 3.3.11, describes the Government's view that large capacities of low-carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar".</p>

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				<p>This support for large scale solar as part of the 'answer' to net zero and energy security has been repeated in the draft national policy statements EN-1 and EN-3, published in March 2023.</p> <p>Figure 7.2 <b>[APP-320]</b> shows that future energy scenarios which are predicted to achieve Net Zero include solar capacities in 2030 of 25 – 42GW, and in 2050 of 57 – 92GW, up from circa 15GW in mid-2023.</p> <p>Paragraph 5.5.8 <b>[APP-320]</b> states that solar generated 11.7TWh of energy in 2019, over 12.1TWh in 2020 and in 2021 generation was 11.2TWh. National Grid operational data shows that solar generated 12.6TWh in 2022.</p> <p>The deployment of 15GW of solar in the UK to date, and its consistent contribution towards meeting electricity demand over recent years, demonstrates that solar technology is proven in the UK.</p> <p>Large-scale solar is also now technically and economically feasible in the UK, as evidenced by the increasing scale of projects which are coming forwards, shown in the analysis included in Chapter 10 <b>[APP-320]</b>. The Applicant cites three large-scale, nationally significant solar developments which have been consented, namely Cleve Hill Solar Park, Little Crow Solar Park and Longfield Solar Farm, as well as a number of projects which are progressing through the</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p>DCO process, as evidence of the feasibility of large scale solar in the UK.</p> <p>In relation to the effectiveness of the Scheme, Section 6.2 of <b>7.5 Planning Statement [APP-313]</b> sets out how the Scheme will meet the compelling need for renewable energy in accordance with relevant national planning policies. In summary, the Scheme would:</p> <ul style="list-style-type: none"> <li>• Deliver a large amount of renewable generation capacity (21,956,988 MWh over the estimated 40-year assessed lifetime) to deliver the Government's energy objectives and legally binding net zero commitments in line with the requirements of paragraph 1.1.1 of NPS EN-3, paragraph 3.3.20 of draft NPS EN-1, section 3.4 of NPS EN-1 and the National Infrastructure Strategy 2020 (para. 6.2.25);</li> <li>• Deliver a reduction of 3,981,049 tCO<sub>2</sub>e over the lifetime of the Scheme compared to if it did not go ahead which would make a significant contribution towards reducing carbon emissions as required by paragraph 1.1.1 of NPS EN-1, paragraph 2.3.3 of Draft NPS EN-1, the National Infrastructure Strategy 2020 and the Energy White Paper: "Powering our net zero future" (para. 6.2.25);</li> <li>• Deliver in a timescale that is short in the context of the delivery of other forms of energy generation in line with the urgent need to decarbonise set out in</li> </ul>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p>paragraphs 3.3.5, 3.3.15 and 3.4.5 of NPS EN-1, Paragraph 2.3.3 of Draft NPS EN-1 and the National Infrastructure Strategy 2020 (paras. 6.2.25);</p> <ul style="list-style-type: none"> <li>• Enable all consumers to benefit from the effect of low-marginal cost solar generation by reducing market prices, in line with the aim to provide affordable energy for consumers set out at Paragraph 2.3.3, Paragraph 2.3.6 and 3.3.20 of Draft NPS EN-1 (para 6.2.25);and</li> <li>• Help ensure security and reliability of energy supply in line with Paragraph 2.3.3 and 2.3.6 of the Draft NPS EN-1 (para 6.2.25).</li> </ul> <p>With regard to soil quality, paragraph 19.9.14 of <b>6.2.19 Environmental Statement – Chapter 19 Soils and Agriculture [APP-057]</b> references Defra R&amp;D project SP08016 (Best Practice for Managing Soil Organic Matter in Agriculture). This project makes clear that the reversion of arable land to pasture, as will occur across the majority of the Sites, reliably delivers both soil health and wider environmental benefits. As the development is temporary and the land benefits from an extended fallow, there is not anticipated to be any loss of agricultural land extent or quality.</p>
PRI-15	RR-017; RR-019; RR-041; RR-054; RR-058; RR-071; RR-082; RR-088; RR-098;	Size of Scheme	Concern that the Scheme is too large.	Section 3.3 of <b>7.11 Statement of Need [APP-320]</b> , specifically paragraphs 3.3.5 and 3.3.11, describes the Government's view that large capacities of low-carbon

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
	RR-103; RR-109; RR-125; RR-134; RR-138; RR-157; RR-165; RR-167; RR-174; RR-191; RR-200; RR-208; RR-226; RR-247; RR-261; RR-269; RR-273; RR-279; RR-284; RR-287; RR-293; RR-296; RR-335		<p>Some comments refer to solar taking up too much land, in comparison to alternative sources of energy.</p> <p>Some comments refer to statistics to compare the size of the Scheme to a number of football pitches, for example.</p> <p>Some comments refer to a few hundred panels as not an issue, but claim the Government is going the wrong way with solar Schemes of this size.</p>	<p>generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that <i>"a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar"</i>. This support for large scale solar as part of the 'answer' to net zero and energy security has been repeated in the draft national policy statements EN-1 and EN-3, published in March 2023.</p> <p>Figure 7.1 of <b>7.11 Statement of Need [APP-320]</b> shows National Grid Electricity System Operator's projections of the capacity of solar generation required to deliver a net-zero consistent system, which are 25 – 42GW by 2030, and 57 – 92GW by 2050, compared to just 15GW at the date of this written submission.</p> <p>Table 7.1 of <b>7.11 Statement of Need [APP-320]</b> shows the electricity generated per hectare by different low-carbon technologies. At the UK's average solar load factor (11%), solar generation produces much more energy per hectare than biogas, and generates a similar amount of energy as onshore wind.</p> <p>Furthermore, paragraph 7.6.8 of <b>7.11 Statement of Need [APP-320]</b> states that: <i>"Draft NPS EN-3 includes an anticipated range of 2 to 4 acres for each MW of output generally required for a solar farm along with its associated infrastructure. The Scheme as proposed delivers a large-scale solar generation asset which is consistent</i></p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p><i>with this range. This demonstrates that the proposed location is a suitable site which is consistent with government's view of best practice ratios of land take and installed capacity."</i></p> <p>While smaller solar schemes also have an important role to play in achieving Net Zero, Paragraph 8.5.7 of <b>7.11 Statement of Need [APP-320]</b> describes that <i>"Government does not believe that decentralised and community energy systems are likely to lead to significant replacement of large-scale infrastructure"</i></p> <p>Section 7.7 of <b>7.11 Statement of Need [APP-320]</b> sets out how the design of the Scheme seeks to maximise utilisation of the grid connection capacity available at the West Burton National Grid Substation.</p>
PRI-16	RR-002	Support of Scheme	Comment providing support for the Scheme.	The Applicant notes this comment and welcomes such support for the Scheme.



### 3.13 Socio-economics, Tourism and Recreation

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
STR-01	RR-007; RR-021; RR-156	Criminal activity	Concern that the site will increase criminal activity in the area.	<p>The Applicant is not aware of any evidence to suggest that rural crime would be impacted as a result of the Scheme's construction, operation and decommissioning.</p> <p>At the statutory consultation stage (Section 42), the Lincolnshire Police provided comment regarding the Scheme and raised no objection to the Scheme as a whole and raised no concerns relating to public security. This is set out in <b>5.13 Consultation Report - Appendix 5.13 - Section 42 Applicant Response [APP-037]</b>. The only comments provided relate to the security features of the Scheme itself.</p> <p>As set out in <b>7.1_A Outline Construction Environmental Management Plan Revision A [EN010132/EX1/WB7.1_A]</b> (secured through requirement 13 of the <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>), Section 2.11, there will be designated security staff during construction who will manage the Order limits and patrol the perimeter.</p> <p>Section 2.8 of <b>7.14_A Outline Operational Environmental Management Plan Revision A [EN010132/EX1/WB7.14_A]</b> (secured through</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p>requirement 14 of the <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>), sets out that the Sites will receive several security risk management threat assessments during the development, construction, operation, and ultimately decommissioning phases. These security risk management threat assessments are conducted by suitably qualified and experienced persons (SQEP) and will determine security risks.</p> <p>The Applicant recognises the symbiotic relationship between safety and security. The security arrangements to be present at the Site will therefore contribute to the overall safety of all who will, or may, enter the Sites. The security arrangements will be SQEP reviewed at identified times commensurate to the Security Risk rating and will further assess any changes in the Security Risk Management Threat Assessment.</p> <p>The security features that are proposed as part of the Scheme are set out within Section 4.5 of <b>6.2.4 Environmental Statement - Chapter 4 Scheme Description [APP-042]</b> and set out in Section 2.8 of <b>7.14_A Outline Operational Environmental Management Plan Revision A [EN010132/EX1/WB7.14_A]</b> (as secured by Requirement 14 of Schedule 2 of <b>3.1_A Draft</b></p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p><b>Development Consent Order Revision A [EN010132/EX1/WB3.1_A]:</b></p> <ul style="list-style-type: none"> <li>• Detection systems such as beam break, image detection etc. to raise alarm when fence breached;</li> <li>• Audio announcement when intruder detected to warn alarm triggered and police on way;</li> <li>• Barriers/locked gates at main entrances to the Sites;</li> <li>• Steel doors on substation buildings;</li> <li>• Buried cables as much as possible;</li> <li>• Remote monitoring; and</li> <li>• Alarm response contract with keyholder/security company</li> </ul> <p>For the solar arrays there will be a maximum of 2.5m high deer wire mesh fencing, 3m high maximum pole mounted CCTV systems. The substations and BESS is proposed to have palisade fencing which is a maximum height of 2.6m (see paragraphs 4.5.57 to 4.5.60 of <b>6.2.4 Environmental Statement - Chapter 4 Scheme Description [APP-042]</b>).</p> <p>Paragraph 4.5.61 <b>[APP-042]</b> states that, "Lighting is not required within the solar arrays. Lighting will be</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				provided within substations and within the Energy Storage site to be used only in the event of it being required for maintenance and security purposes. Down lighting would be used on lighting columns of a maximum height of 3m."
STR-02	RR-021; RR-156	Deprivation	Concern that the Scheme has been chosen in this particular area as it is an area of high deprivation and will result in little opposition.	<p>The Applicant recognises that the Bassetlaw and West Lindsey districts are relatively economically deprived areas (see para. 18.5.29 in <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b>). This has not been a contributing factor to the site selection process.</p> <p>The Scheme, through the measures set out in Section 5 of <b>7.10 Outline Skills Supply Chain and Employment Plan [APP-319]</b>, is anticipated to improve local access to employment, and improve local education and skills attainment across the lifetime of the Scheme. These measures are anticipated to bring significant beneficial effects during the construction phase of the Scheme, as assessed in para. 18.8.11-13 in <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b>.</p> <p>The Applicant confirms that a Skills, Supply Chain and Employment Plan is secured by Requirement 20 of Schedule 2 to <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
STR-03	RR-008; RR-020; RR-025; RR-040; RR-053; RR-062; RR-067; RR-083; RR-095; RR-102; RR-104; RR-115; RR-124; RR-139; RR-146; RR-154; RR-168; RR-173; RR-175; RR-191; RR-193; RR-194; RR-199; RR-202; RR-220; RR-222; RR-234; RR-240; RR-246; RR-262; RR-263; RR-265; RR-268; RR-272; RR-307; RR-312; RR-316; RR-334; RR-343	Employment	<p>Comment that jobs in agriculture will be reduced/lost.</p> <p>Some comments refer to farmers losing their jobs in the immediate future.</p> <p>Some comments refer to the poor situation tenant farmers will face.</p> <p>Some comments refer to little to no agricultural jobs in 40 years time when the Scheme is expected to decommission.</p>	<p>The Applicant recognises the significance of the agricultural industry in the local economy and has assessed the economic impact of the Scheme in Section 18.7 of <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b> and the direct impacts on local agriculture in Sections 19.9 and 19.10 of <b>6.2.19 Environmental Statement - Chapter 19 Soils and Agriculture [APP-057]</b>.</p> <p>The Scheme is anticipated to lead to a maximum (worst-case) loss of approximately 13 full-time equivalent agriculture jobs, as stated in paragraph 18.7.15 of document <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b>. The Scheme is estimated to employ 8 full-time equivalent employees from the local area during operation; see Table 18.16. The net change in employment in the local area (defined as West Lindsey and Bassetlaw Districts) during the Scheme's operational life is a loss of approximately 2 full-time jobs, once consideration of direct, indirect and induced employment, and impacts on the tourism and recreation industry are considered (see para. 18.7.81). Overall, the economic benefit to the local area is estimated to be £1.5 million per year (see para. 18.7.99).</p> <p>The overall employment and economic benefit to the local area from the two-year construction period is</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p>anticipated to be 432 full-time equivalent jobs (see para. 18.7.23), generating £20.0 million per year (see para. 18.7.52).</p> <p>The land included in the Scheme covers 4 farm businesses, all of which are owner occupiers of the land within the Sites. Each of the land owners has signed a voluntary option agreement with the Applicant. This is detailed in full in para. 7.1.1-29 of <b>6.3.19.1 Environmental Statement - Appendix 19.1 Agricultural Land Quality, Soil Resources and Farming Circumstances Report [APP-137]</b>. As a result, there is no anticipated impact on tenant farmers beyond potential short-term impacts as a result of temporary works to lay cables between the Sites and the Grid Connection Point.</p> <p>Upon decommissioning, the Sites will be reinstated (see paras. 3.3.20 to 3.3.26) after which arable production can resume. This requirement to restore the land to arable use is secured through Requirement 21 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p>
STR-04	RR-005; RR-007; RR-015; RR-019; RR-022; RR-037; RR-040; RR-044; RR-055; RR-060; RR-062; RR-063; RR-103; RR-113; RR-118;	House prices	Opposition to the Scheme due to anticipated devaluation of local property values.	Property value is not a consideration for decision making on development consent orders. As such, impacts on property values have not been assessed as part of the Application. Nonetheless, there is no strong evidence to show solar farms negatively affect nearby

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
	RR-126; RR-139; RR-142; RR-170; RR-176; RR-235; RR-246; RR-247; RR-268; RR-275; RR-303; RR-316; RR-335		<p>Some comments question who will compensate for devaluation of properties.</p> <p>Some comments refer to purchasing a property in the local area and not knowing of the Scheme, and subsequently being unable to recoup the money spent on the property.</p>	<p>property values, and it is more likely that other factors have more significant effects on property values.</p>
STR-05	RR-284; RR-307; RR-344	Levelling Up	<p>Belief that solar schemes should not be considered as levelling up.</p> <p>Some comments claim that the Scheme further raises north/south divides and the Scheme would not go ahead in the south. Further concern that the Scheme is designed to keep the East of England a poor relation to the UK and economically impoverished.</p>	<p>Section 3.3 of <b>7.11 Statement of Need [APP-320]</b>, describes the Government's view that large capacities of low-carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar". This support for large scale solar as part of the 'answer' to net zero and energy security has been repeated in the draft national policy statements EN-1 and EN-3, published in March 2023.</p> <p>Section 7.5 <b>[APP-320]</b> describes how suitable locations for large-scale solar are identified and assessed. Paragraph 7.5.2 outlines the broad criteria for determining site suitability.</p> <p>Figure 7.4 <b>[APP-320]</b> shows the level of photovoltaic power potential at the proposed locations. Section 9</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p>describes the advantages of connecting large-scale solar to the existing and robust National Electricity Transmission System at the proposed Point of Connection at West Burton Power Station, and paragraph 9.4.4 concludes that the Scheme will contribute to national system adequacy and decarbonisation targets.</p> <p><b>6.2.5 Environmental Statement - Chapter 5 Alternatives and Design Evolution [APP-043]</b> and its accompanying appendix <b>6.3.5.1 A Environmental Statement - Appendix 5.1 Site Selection Assessment Revision A [AS-004]</b> explain how the Sites were chosen in light of that need.</p> <p>Specifically, paragraph 2.1.10 <b>[AS-004]</b> explains the reasons why sites of the size proposed are required to meet the 480MW grid connection offer. The methodology used for the site selection process is considered reasonable and proportionate and complies with the requirements of paragraph 4.4.3 of NPS EN-1. This is explained at Section 2.1 <b>[AS-004]</b>.</p> <p>The Scheme is anticipated to bring direct, indirect, and induced employment and economic benefits to the Local and Regional Impact Area as set out in Section 18.7, 18.8, and 18.10 of <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b>. The net changes to</p>



Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p>employment, and to economic Gross Value Added in the local area (defined as West Lindsey and Bassetlaw districts) are:</p> <p>For construction: +432 FTE jobs (para. 18.7.21), +£20.0 million per year (para. 18.7.52);</p> <p>For operation: -2 FTE jobs(para. 18.7.81), +£1.5million per year (para. 18.7.99);</p> <p>For decommissioning: +324 FTE jobs (para. 18.7.129), minor beneficial impact to GVA (para. 18.7.139).</p>
STR-06	RR-012; RR-059; RR-083; RR-088; RR-095; RR-115; RR-119; RR-133; RR-139; RR-140; RR-154; RR-160; RR-168; RR-171; RR-173; RR-175; RR-205; RR-240; RR-257; RR-265; RR-268; RR-280; RR-334; RR-337	Loss of business	<p>Concern that personal business will cease trading because of the Scheme.</p> <p>Some comments refer to personal farm/cottage let businesses/ tourist spots being detrimentally impacted by the Scheme.</p>	<p>Impacts on business, including those within the accommodation sector, tourism and recreation have been assessed as a whole across the Local Impact Area (Bassetlaw and West Lindsey districts) in Section 18.7 of <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b>. Individual cases of impacts on rural businesses nearby to the Scheme, unless they are also identified as residential receptor in <b>6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b>, have not been assessed separately.</p>
			<p>Some comments refer to a lack of compensation for potential economic loss.</p>	<p>Businesses and landowners whose land is directly impacted by works associated with the Scheme will be subject to statutory protections that require the payment of compensation in circumstances where their</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
			<p>Some comments refer to job losses/ economic impacts across the local area due to the Scheme.</p> <p>Some comments refer to the people becoming poor as a result of the Scheme.</p> <p>Concern that quality of life will be reduced due to economic loss.</p>	<p>land interests are affected by the Scheme. Details of these protections are set out in further detail in <b>4.1 Statement of Reasons [APP-019]</b>.</p> <p>The Scheme is anticipated to bring direct, indirect, and induced employment and economic benefits to the Local and Regional Impact Area as set out in Section 18.7, 18.8, and 18.10 of <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b>. The net changes to employment, and to economic Gross Value Added in the local area (defined as West Lindsey and Bassetlaw districts) are:</p> <ul style="list-style-type: none"> <li>• For construction: +432 FTE jobs (para. 18.7.21), +£20.0 million per year (para. 18.7.52);</li> <li>• For operation: -2 FTE jobs (para. 18.7.81), +£1.5million per year (para. 18.7.99);</li> <li>• For decommissioning: +324 FTE jobs (para. 18.7.129), minor beneficial impact to GVA (para. 18.7.139).</li> </ul> <p>As a result of the uplift in GVA across the Scheme's lifetime, there is anticipated to be an uplift in economic prosperity in the Local Impact Area. This is assessed to be a medium-term moderate-minor beneficial effect during construction (18.7.53), a long-term minor beneficial effect during operation (18.7.100), and a</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				medium-term temporary moderate-minor beneficial effect during decommissioning (18.7.141).
			<p>Some comments refer to a missed opportunity to support UK business in relation to supply chains.</p> <p>Some comments refer to the different skillset required for construction work in comparison to farming, and therefore the Scheme being unlikely to contribute job gains for the local community.</p>	<p>Section 5 of <b>7.10 Outline Skills Supply Chain and Employment Plan [APP-319]</b> describes the additional measures which are being pursued as part of the Scheme to provide local economic benefits. These include providing additional skills training (paras. 5.2.1 to 5.2.12), maximising local recruitment and enhancing opportunities for local procurement (paras. 5.3.1 to 5.4.6).</p> <p>The Applicant confirms that a Skills, Supply Chain and Employment Plan is secured by Requirement 20 of Schedule 2 to <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p>
STR-07	RR-198	Personal and community benefit	Concern that there is no community benefit or enhancement of their livelihoods due to the Scheme.	<p>The Applicant respectfully disagrees with this statement.</p> <p>Section 4.6 of <b>7.5 Planning Statement [APP-313]</b> details the 'Other Benefits of the Scheme', beyond the national benefits in Sections 4.2 to 4.5 <b>[APP-313]</b>.</p> <p>Paragraph 4.6.1 <b>[APP-313]</b> states that the Scheme will result in a significant Net Gain for biodiversity (86.80% gains provided in habitat, 54.71% gains in hedgerow and 33.25% gains in river units).</p> <p>The Applicant has also been in discussions with Saxilby Nature Project to agree inclusion of habitat</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p>management land for community use in the DCO application.</p> <p>A total of 0.8ha of land has been set aside as a habitat management area (Work No.10 in Schedule 1 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>). This area has been set aside to assure it aligns with the objectives of Saxilby Nature Project and their neighbouring Hardwick Scrub site (see para. 4.5.90 of <b>6.2.4 Environmental Statement - Chapter 4 Scheme Description [APP-042]</b>).</p> <p>Any financial contributions towards the use of this land by Saxilby Nature Project will be agreed outside the scope of the DCO through the Community Benefit Fund, as described in paragraph 4.8.1 of <b>7.5 Planning Statement [APP-313]</b>.</p> <p>Paragraph 4.6.1 <b>[APP-313]</b> explains that a new permissive path from Track off Sykes Lane along the Codder Lane Belt and then south and west to rejoin Sykes Lane opposite Hardwick Scrub will be in place during the operational phase of the Scheme, thus improving local amenity.</p> <p>Paragraph 4.6.1 <b>[APP-313]</b> goes on to explain that a Skills, Supply Chain and Employment Plan, as secured through Requirement 20 in Schedule 2 of the <b>3.1_A Draft Development Consent Order Revision A</b></p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p>[EN010132/EX1/WB3.1_A], will be in place prior to construction and will set out the measures that the Applicant will implement to advertise and promote employment and training opportunities associated with the Scheme in construction and operation locally.</p> <p>Separately to the Application, the Applicant is committed to providing a Community Benefit Fund (see paragraph 4.8.1 of <b>7.5 Planning Statement [APP-313]</b>). This fund will be available for community-based benefits such as (but not limited to) community-led energy related projects.</p> <p>The Scheme is anticipated to bring direct, indirect, and induced employment and economic benefits to the Local and Regional Impact Area as set out in Section 18.7, 18.8, and 18.10 of <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b>. The net changes to employment, and to economic Gross Value Added in the local area (defined as West Lindsey and Bassetlaw districts) are:</p> <ul style="list-style-type: none"> <li>• For construction: +432 FTE jobs (para. 18.7.21), +£20.0 million per year (para. 18.7.52);</li> <li>• For operation: -2 FTE jobs (para. 18.7.81), +£1.5million per year (para. 18.7.99);</li> </ul>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<ul style="list-style-type: none"> <li>For decommissioning: +324 FTE jobs (para. 18.7.129), minor beneficial impact to GVA (para. 18.7.139).</li> </ul> <p>As a result of the uplift in GVA across the Scheme's lifetime, there is anticipated to be an uplift in economic prosperity in the Local Impact Area. This is assessed to be a medium-term moderate-minor beneficial effect during construction (18.7.53), a long-term minor beneficial effect during operation (18.7.100), and a medium-term temporary moderate-minor beneficial effect during decommissioning (18.7.141).</p> <p>The Scheme, through the measures set out in Section 5 of <b>7.10 Outline Skills Supply Chain and Employment Plan [APP-319]</b>, is anticipated to improve local access to employment, and improve local education and skills attainment across the lifetime of the Scheme. These measures are anticipated to bring significant beneficial effects during construction, as assessed in para. 18.8.11-13 in <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b>.</p>
STR-08	RR-021; RR-040; RR-062; RR-079; RR-124; RR-156; RR-168; RR-171; RR-263; RR-267; RR-268; RR-316; RR-337	Tourism	<p>Comment that the Scheme will directly impact tourism.</p> <p>Some comments refer to the loss of tourism in Broxholme.</p>	<p>The Applicant recognises the significance of the tourism industry in the local economy and has assessed the employment and economic impact of the Scheme to the tourism and recreation sector in Section 18.7 of</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p><b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056].</b></p> <p>The impacts from the Scheme on the tourism and recreation industry in the Local Impact Area (of which West Lindsey is in Lincolnshire) have been assessed as follows:</p> <ul style="list-style-type: none"> <li>• During construction, both employment in (para. 18.7.19) and economic performance of (para. 18.7.50) the tourism and recreation industry are anticipated to experience a neutral effect.</li> <li>• During operation, the worst case impact on employment in (para. 18.7.80) and economic performance of (para. 18.7.97) the tourism and recreation industry is anticipated to be a minor, long-term adverse effect.</li> <li>• During operation, the worst case impact on employment in (para. 18.7.126) and economic performance of (para. 18.7.137) the tourism and recreation industry is anticipated to be a minor, medium-term adverse effect.</li> </ul> <p>None of these effects are considered to be significant.</p>

### 3.14 Soils and Agriculture

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
SOI-01	RR-003; RR-004; RR-006; RR-007; RR-008; RR-009; RR-010; RR-013; RR-014; RR-015; RR-019; RR-020; RR-021; RR-022; RR-024; RR-025; RR-028; RR-034; RR-035; RR-036; RR-039; RR-040; RR-041; RR-042; RR-043; RR-045; RR-047; RR-049; RR-050; RR-051; RR-052; RR-053; RR-054; RR-055; RR-056; RR-057; RR-058; RR-059; RR-060; RR-061; RR-062; RR-063; RR-065; RR-066; RR-067; RR-069; RR-070; RR-073; RR-074; RR-075; RR-078; RR-079; RR-080; RR-081; RR-082; RR-083; RR-085; RR-086; RR-088; RR-096; RR-097; RR-099; RR-100;	Agricultural Land	<p>Opposition to the Scheme due to a loss of agricultural land.</p> <p>Some comments refer to this loss of land having a negative impact on UK food security.</p> <p>Some comments refer to the war in Ukraine exacerbating food security issues.</p> <p>Some comments refer to personal yield figures or cite other figures from internet sources.</p> <p>Some comments refer to the rising UK population as a reason to not lose agricultural land.</p> <p>Some comments refer to the land in between panels not being in a suitable condition for animal grazing due to no vegetation growing in the shade created by</p>	<p>It is the Applicant's view that the concerns raised regarding solar farm effects on food security and sustainability are misplaced.</p> <p>A large proportion of the agricultural land within the solar farm development can be retained in agricultural use during the operational phase of the Scheme for uses such as grazing sheep, as stated in paragraph 19.3.3 of <b>6.2.19 Environmental Statement - Chapter 19 Soils and Agriculture [APP-057]</b>. The agricultural land resource being used for the Scheme is not lost permanently as set out in paragraph 19.9.3 of <b>6.2.19 Environmental Statement - Chapter 19 Soils and Agriculture [APP-057]</b>. . Food security is not a material planning consideration. Nonetheless, as outlined in paragraph 19.5.2 <b>[APP-057]</b> a solar farm requires considerably less land to produce a kWh of electricity than energy crops such as miscanthus, biodiesel and crops for anaerobic digestion. Defra's report on Food Security for the UK<sup>7</sup> notes that trends in proportion of food consumption grown in the UK, have remained stable for several decades regardless of changes in</p>

<sup>7</sup> UK Food Security Report 2021, Department for Environment Food & Rural Affairs



Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
	RR-101; RR-102; RR-103; RR-104; RR-105; RR-106; RR-107; RR-109; RR-110; RR-111; RR-112; RR-114; RR-115; RR-116; RR-117; RR-118; RR-119; RR-121; RR-124; RR-125; RR-126; RR-127; RR-128; RR-129; RR-130; RR-131; RR-132; RR-133; RR-136; RR-138; RR-139; RR-140; RR-141; RR-142; RR-143; RR-144; RR-145; RR-148; RR-150; RR-151; RR-152; RR-153; RR-154; RR-155; RR-156; RR-157; RR-159; RR-160; RR-161; RR-162; RR-163; RR-164; RR-165; RR-166; RR-168; RR-169; RR-170; RR-171; RR-173; RR-174; RR-176; RR-177; RR-182; RR-183; RR-184; RR-185; RR-187; RR-189; RR-191; RR-192; RR-193; RR-194; RR-196; RR-197; RR-198; RR-199; RR-200; RR-202; RR-203; RR-205; RR-206;		<p>the panels and the soil being too dry.</p> <p>Some comments refer to future energy generation being high, but the amount of food available being lower as a consequence.</p> <p>Some comments refer to the Applicant failing to follow the guidance included in the government Policy paper British Energy Security Strategy - Updated 7 April 2022 presented by the Prime Minister Boris Johnson.</p>	<p>population, and that the most serious risks to UK food security include climate change and soil degradation.</p> <p>Solar farms have existed on sites across the UK for several years now and are routinely grazed by livestock. Please see BRE (2014) Agricultural Good Practice Guidance for Solar Farms. Ed J Scurlock.</p> <p>Section 3.3 of <b>7.11 Statement of Need [APP-320]</b>, specifically paragraphs 3.3.5 and 3.3.11, describes the Government's view that large capacities of low-carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that <i>"a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar"</i>. This support for large scale solar as part of the 'answer' to net zero and energy security has been repeated in the draft national policy statements EN-1 and EN-3, published in March 2023.</p> <p>Paragraph 7.6.8 <b>[APP-320]</b> states that: <i>"Draft NPS EN-3 includes an anticipated range of 2 to 4 acres for each MW of output generally required for a solar farm along with its associated infrastructure. The Scheme as proposed delivers a large-scale solar generation asset which is consistent with this range. This demonstrates that the proposed location is a suitable site which is consistent with government's view of best practice ratios of land take and installed capacity."</i></p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
	RR-207; RR-209; RR-211; RR-212; RR-214; RR-215; RR-216; RR-217; RR-219; RR-220; RR-221; RR-222; RR-223; RR-224; RR-225; RR-226; RR-227; RR-228; RR-229; RR-234; RR-237; RR-239; RR-246; RR-247; RR-248; RR-249; RR-251; RR-252; RR-254; RR-255; RR-256; RR-257; RR-258; RR-262; RR-263; RR-264; RR-265; RR-266; RR-268; RR-271; RR-272; RR-273; RR-274; RR-275; RR-276; RR-277; RR-278; RR-280; RR-284; RR-287; RR-288; RR-290; RR-291; RR-292; RR-293; RR-294; RR-295; RR-296; RR-301; RR-302; RR-303; RR-304; RR-305; RR-306; RR-307; RR-311; RR-312; RR-313; RR-314; RR-315; RR-316; RR-318; RR-323; RR-325; RR-326; RR-327; RR-328; RR-329; RR-330; RR-332; RR-335;			Section 8.9 <b>[APP-320]</b> discusses the British Energy Security Strategy and the support it offers to UK-based ground mounted solar. At Paragraph 8.9.5, it is noted that this support includes a "5-fold increase in deployment of solar technology by 2035" and for ground-mounted solar, a "future consultation on planning rules to strengthen policy in favour of development on non-protected land, while ensuring communities continue to have a say and environmental protections remain in place."
			Some comments refer to giving up agricultural land for money being incorrect.	The British Energy Security Strategy talks to Government support for "the effective use of land by encouraging large scale projects to locate on previously developed, or lower value land, where possible, and ensure projects are designed to avoid, mitigate, and where necessary, compensate for the impacts of using greenfield sites." The Strategy therefore foresees the need for some solar schemes to be located on greenfield sites, which will be required to compensate for any impacts which are identified as a consequence of their development.
			Some comments refer to replacing agricultural land for solar as swapping one problem for another.	It is the Applicant's view that the concerns raised regarding solar farm effects on food security and sustainability, are misplaced.  Food security is not a material planning consideration. Nonetheless, as outlined in paragraph 19.5.2 <b>[APP-057]</b>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
	RR-336; RR-337; RR-338; RR-339; RR-343; RR-346; RR-348; RR-349			a solar farm requires considerably less land to produce a kWh of electricity than energy crops such as miscanthus, biodiesel and crops for anaerobic digestion. Defra's report on Food Security for the UK <sup>8</sup> notes that trends in proportion of food consumption grown in the UK, have remained stable for several decades regardless of changes in population, and that the most serious risks to UK food security include climate change and soil degradation.
SOI-02	RR-253	Future farming	Concern that the Scheme will block future farming in the area.	<p>As set out in the <b>Outline Decommissioning Statement [APP-310]</b>, the land within the Site will be returned to the respective landowners and to its original use after decommissioning, after which the Applicant will have no control over its future use.</p> <p>The Applicant confirms that the following is secured through Requirement 21 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>: "Within 12 months of the date that the undertaker decides to decommission any part of the authorised development, the undertaker must submit to the relevant planning authority for that part a decommissioning plan for approval" where "The decommissioning plan must be substantially in</p>

<sup>8</sup> UK Food Security Report 2021, Department for Environment Food & Rural Affairs

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p>accordance with the outline decommissioning statement."</p> <p>Details of the protection and restoration of soil during and post-decommissioning are set out in Table 3.1 of <b>7.2 Outline Decommissioning Statement [APP-310]</b>.</p>
SOI-03	RR-004; RR-021; RR-063; RR-083; RR-151; RR-156; RR-220; RR-247; RR-257; RR-262; RR-284; RR-290	Land Quality	<p>Comments that the land used is not degraded/3B land.</p> <p>Some comments refer to inaccurate gradings of the land taking place for the purpose of getting planning consent.</p> <p>Some comments refer to independent soil surveys taking place.</p>	<p><b>6.3.19.1 Environmental Statement - Appendix 19.1 Agricultural Land Quality, Soil Resources and Farming Circumstances Report [APP-137]</b> presents a detailed and objective Agricultural Land Classification (ALC) assessment that follows the guidance given by Natural England.</p> <p>Initial results were reviewed by an ALC specialist not involved in the field survey work. Their recommendations for additional field work and laboratory sampling were implemented.</p> <p>Natural England retain several ALC specialists, and will appraise the Applicant's ALC assessment. Natural England are the statutory consultee regarding agricultural land in planning. In REP-098 Natural England note the following : - <i>"Natural England are satisfied that the detailed ALC survey undertaken across the order limits is appropriate."</i></p>
SOI-04	RR-015; RR-019; RR-026; RR-067; RR-070; RR-082;	Land restoration	Concern regarding whether land will be restored after decommissioning.	As stated in paragraph 4.8.1 of <b>6.2.4 Environmental Statement - Chapter 4 Scheme Description [APP-</b>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
	RR-102; RR-154; RR-247; RR-255; RR-314; RR-329		<p>Some comments refer to how the land will be contaminated during the operational phase of the Scheme, and cannot be used for agricultural use following decommissioning.</p> <p>Some comments refer to whether there will be a future bill for the Scheme, and if so, who will pay for it (company or taxpayers/councils).</p> <p>Some comments refer to whether there are reinstatement obligations of the Applicant at lease end.</p> <p>Some comments refer to the lack of commitment to land restoration from the Applicant.</p>	<p><b>042]</b>, decommissioning is expected to take between 12 and 24 months and will be undertaken in phases.</p> <p>As set out in the <b>Outline Decommissioning Statement [APP-310]</b>, the land within the Scheme's Sites will be returned to the respective landowners and to its original use after decommissioning, after which the Applicant will have no control over its future use.</p> <p>The Applicant confirms that the following is secured through Requirement 21 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>: "Within 12 months of the date that the undertaker decides to decommission any part of the authorised development, the undertaker must submit to the relevant planning authority for that part a decommissioning plan for approval" where "The decommissioning plan must be substantially in accordance with the outline decommissioning statement."</p> <p>Details of the protection and restoration of soil during and post-decommissioning are set out in Table 3.1 of <b>7.2 Outline Decommissioning Statement [APP-310]</b>.</p>
SOI-05	RR-104	Soil Compaction	Concern that once the Scheme is constructed, soil compaction will take place and ruin further chance of agricultural use.	As written into <b>7.2 Outline Decommissioning Statement [APP-310]</b> , paragraph 2.1.8 confirms that "where localised soil compaction occurs from the presence of structures such as the substations or the BESS; or the weight of mobile machinery used through construction,

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p><i>operation and decommissioning, management measures are identified to alleviate compaction (e.g., through ploughing and aeration), to maintain soil structure and enable reinstatement of the land to its original use."</i></p> <p>The decommissioning mitigation and site restoration measures set out in <b>7.2 Outline Decommissioning Statement [APP-310]</b> are secured by Requirement 21 in Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p>

### 3.15 Transport and Access

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
TRA-01	RR-094	Church Lane	Specific concern regarding the proposed access route of Church Lane, Broxholme and that it is currently unsuitable to be used as an access route from an engineering standpoint. Belief that other routes to the east should be used as an alternative.	Church Lane, Broxholme has not been selected as a construction or maintenance access point to the West Burton 1 Site. Access to the fields to the east of Broxholme village will be from the existing field access and track approximately 400m northeast of Church Lane. This is identified as access point 2 in Figure 3.1, and access point 119 in Figure 3.2 of <b>6.3.14.1_A Environmental Statement - Appendix 14.1 Transport Assessment Revision A [EN010132/EX1/WB6.3.14.1_A]</b> . Furthermore, construction traffic will be routed to this access point from the A1500 (see Figure 5.1 <b>[EN010132/EX1/WB6.3.14.1_A]</b> ) so that no construction traffic routed through Broxholme village.
TRA-02	RR-280	Personal disruption due to traffic	Comment that the Scheme is opposite the respondent's house on a busy main road. Concern regarding constant noise of lorries and construction which will disturb the respondent and family member (who experiences problems sleeping), and personal horses.	Section 6 of <b>6.3.14.1_A Environmental Statement - Appendix 14.1 Transport Assessment Revision A [EN010132/EX1/WB6.3.14.1_A]</b> provides an overview of the construction vehicle movements along the various routes. HGV movement is generally low on a day to day basis during the construction phase. These were considered the most appropriate and direct routes for construction vehicles. HGV movement will generally

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p>take place between 09:30-16:30, avoiding overnight, early morning and evening periods.</p> <p>An Outline Construction Traffic Management Plan (CTMP) has been prepared to support the application within <b>6.3.14.2_A Environmental Statement - Appendix 14.2 Construction Traffic Management Plan Revision A [EN010132/EX1/WB6.3.14.2_A]</b> which is secured through Requirement 15 in Schedule 2 of the <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p> <p>The outline CTMP submitted as part of the DCO application provides a framework for the management of construction vehicle movements to and from the Scheme, to ensure that the effects of the temporary construction phase on the local highway network are minimised and made acceptable.</p> <p>Additionally, the likely impacts of noise and vibration from construction traffic for the Scheme have been assessed in Section 15.7 of <b>6.2.15 Environmental Statement - Chapter 15 Noise and Vibration [APP-053]</b>. The noise and vibration effects are not anticipated to be significant.</p>
TRA-03	RR-004; RR-005; RR-007; RR-010; RR-019; RR-028; RR-034; RR-054; RR-055;	Road infrastructure	Some comments refer to the length of time the detrimental impact of HGV traffic will take	The anticipated construction period for the Scheme is 24 months, as set out in paragraph 4.3.6 of <b>6.2.4</b>



Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
	RR-061; RR-062; RR-068; RR-071; RR-075; RR-080; RR-081; RR-082; RR-088; RR-095; RR-098; RR-100; RR-101; RR-102; RR-106; RR-110; RR-115; RR-121; RR-127; RR-131; RR-139; RR-142; RR-149; RR-153; RR-154; RR-158; RR-168; RR-169; RR-173; RR-183; RR-187; RR-190; RR-193; RR-194; RR-196; RR-217; RR-219; RR-220; RR-222; RR-247; RR-252; RR-256; RR-263; RR-274; RR-284; RR-292; RR-303; RR-305; RR-325; RR-329; RR-335; RR-343		place due to long construction times.	<p><b>Environmental Statement – Chapter 4 Scheme Description [APP-042].</b></p> <p>An Outline Construction Traffic Management Plan (CTMP) has been prepared to support the application within <b>6.3.14.2_A Environmental Statement - Appendix 14.2 Construction Traffic Management Plan Revision A [EN010132/EX1/WB6.3.14.2_A]</b> which is secured through Requirement 15 in Schedule 2 of the <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p> <p>The outline CTMP submitted as part of the DCO application provides a framework for the management of construction vehicle movements to and from the Scheme, to ensure that the effects of the temporary construction phase on the local highway network are minimised and made acceptable.</p> <p><b>6.3.14.1_A Environmental Statement - Appendix 14.1 Transport Assessment Revision A [EN010132/EX1/WB6.3.14.1_A]</b> provides an assessment of the transport effects of the Scheme and concludes, through paragraphs 11.1 to 11.11, that the Scheme is acceptable from a transport perspective.</p>
			Comments that country roads do not have infrastructure to facilitate construction traffic.	The routes HGVs will take to the Site are set out in Section 6 of the Transport Assessment and Section 5 of <b>6.3.14.2_A Environmental Statement - Appendix 14.2 Construction Traffic Management Plan Revision A</b>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
			<p>Some comments refer to a negative impact to local country / single track roads and traffic by HGV vehicles if the Scheme were to go ahead.</p> <p>Some comments refer to local infrastructure being damaged / at risk because of the Scheme and associated traffic.</p> <p>Some comments refer to road verges outside houses being worn away due to the traffic associated with the Scheme.</p> <p>Some comments refer to the lack of council money to support maintenance of roads during construction.</p>	<p><b>[EN010132/EX1/WB6.3.14.2_A]</b>. The selected routes are the most direct and appropriate for HGV use, and seek to limit the number of HGVs passing through residential areas as much as possible. On a typical day, HGV use on individual routes will be relatively low during the construction period.</p> <p>A number of measures are set out in the CTMP <b>[EN01032/EX1/WB6.3.14.2_A]</b> to minimise the effect of HGVs on the local highway network. These include:</p> <ul style="list-style-type: none"> <li>• Provision of temporary passing bays where required (CTMP Chapter 6 point iii);</li> <li>• Signage (CTMP Chapter 6 point v);</li> <li>• Restricting HGV movements to certain hours outside of the network peak hours of 08:00-09:00 and 17:00-18:00 (CTMP Chapter 6 point vii);</li> <li>• Use of a booking system (CTMP Chapter 6 point xi);</li> <li>• The provision of banksmen (CTMP Chapter 6 point viii);</li> <li>• A commitment to a road condition survey (CTMP Chapter 6 point xxiv and Requirement 15 of DCO); and</li> </ul>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<ul style="list-style-type: none"> <li>A commitment to rectify any defects to the local highway network caused by HGV movement (CTMP Chapter 6 point xxiv) and Requirement 15 of DCO).</li> </ul>
			<p>Some comments refer to cable route works causing damage to local roads.</p> <p>Some comments refer to road closures due to the Scheme.</p>	<p>Where cable is installed within the highway or highway verges, traffic management measures will be implemented. This will be agreed with the local highway authority prior to taking place. Safeguards will be in place to ensure that any damage to the local highway network are rectified to the satisfaction of the local highway authority as set out in paragraph 6.14 of <b>6.3.14.2 Environmental statement Appendix 14.2 Construction Traffic Management Plan [EN01032/EX1/WB6.3.14.2_A]</b>.</p>
			<p>Some comments refer to the narrow nature of the local roads meaning access will cause an accident.</p> <p>Some comments refer to the risk of increased traffic to human health due to potential increased accidents.</p> <p>Some comments refer to a lack of information regarding the effects of traffic on pedestrian, runners,</p>	<p>The assessment of effects of construction traffic on non-motorised users is set out in the <b>6.2.14 Environmental Statement - Chapter 14 Transport and Access [APP-052]</b>.</p> <p>The proposals for management of Public Rights of Way during the lifetime of the scheme are set out in the <b>6.3.14.3 Environmental Statement - Appendix 14.3 Public Rights of Way Management Plan [EN010132/EX1/WB6.3.14.3_A]</b>. Measures include:</p> <ul style="list-style-type: none"> <li>Widened access tracks to ensure vehicles can pass PRow users safely;</li> </ul>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
			<p>dog walkers and other recreational activities.</p>	<ul style="list-style-type: none"> <li>• The provision of banksmen at either end of the PRoW, to hold vehicles if a PRoW user is present and advise PRoW users of the potential for construction vehicles to be present;</li> <li>• Speeds to be limited to 10mph;</li> <li>• Drivers will stop and give-way to any PRoW user that they encounter;</li> <li>• Appropriate signage will be installed along the PRoW to make PRoW users aware of the construction activity. This will include information on construction times and contact details for a public liaison officer;</li> <li>• The PRoW will be kept clear of construction vehicles and apparatus outside of permitted construction hours so far as is practicable to do so;</li> <li>• Any damage to the surface of the footpath will be repaired as soon as practicable. The surface will be returned to its original condition following completion of construction.</li> </ul>
			<p>Some comments refer to abnormal loads vehicles (ALVs) causing a risk of accidents and will need widening of narrow country roads.</p>	<p>Information on abnormal load movements is set out in Section 7 of <b>6.3.14.1_A Environmental Statement - Appendix 14.1 Transport Assessment Revision A [EN010132/EX1/WB6.3.14.1_A]</b>, and Section 6 of <b>6.3.14.2_A Environmental Statement - Appendix 14.2 Construction Traffic Management Plan Revision A</b></p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p>[EN010132/EX1/WB6.3.14.2_A]. Abnormal load specialists 'Wynns' developed the abnormal load movement strategy.</p> <p>Traffic management will be in place for all abnormal load movement, which will be agreed with the police and local highway authority prior to the movement taking place as set out in paragraph 6.10 of <b>6.3.14.2 Environmental statement Appendix 14.2 Construction Traffic Management Plan [EN01032/EX1/WB6.3.14.2_A]</b>.</p>
			<p>Some comments refer to funding for road improvements at decommissioning stage.</p>	<p>The Applicant is committed to undertaking a road condition survey and rectifying any defects to the local highway network caused by HGV movement during construction. These are set out in paragraph 7.2, point xx of <b>6.3.14.2_A Environmental Statement - Appendix 14.2 Construction Traffic Management Plan Revision A [EN010132/EX1/WB6.3.14.2_A]</b>, and secured through Requirement 15 of Schedule 2 to <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p> <p>Likewise, any identified highways defects resulting from decommissioning activities associated with the Scheme will be corrected to the satisfaction of the local highway authority as part of the proposed Decommissioning Plan as secured by Requirement 21 of Schedule 2 to</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
			<p>Some comments refer to disturbance to the Roman Road due to the Scheme and associated vehicles.</p>	<p><b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A].</b></p> <p>Till Bridge Lane is a Roman Road that forms part of the construction vehicle route to West Burton 1 and West Burton 3. It is an A-Road that already accommodates HGV movement.</p> <p>In addition, Stow Park Road will be used for a small number of HGVs associated with the cable route installation. Full details of movements on these roads are set out in the <b>6.3.14.1_A Environmental Statement - Appendix 14.1 Transport Assessment Revision A [EN010132/EX1/WB6.3.14.1_A].</b></p> <p>An Outline Construction Traffic Management Plan (CTMP) has been prepared to support the application within <b>6.3.14.2 Environmental Statement – Appendix 14.2 Construction Traffic Management Plan [EN01032/EX1/WB6.3.14.2_A]</b> which is secured through Requirement 15 in Schedule 2 of the <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A].</b></p> <p>The outline CTMP submitted as part of the DCO application provides a framework for the management of construction vehicle movements to and from the Scheme, to ensure that the effects of the temporary</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
			<p>Some comments refer to concerns that the HGV's associated with the Scheme will increase pollution in the local area.</p> <p>Some comments refer to the dust and dirt caused by construction and associated vehicles.</p>	<p>construction phase on the local highway network are minimised and made acceptable.</p> <p>Noise reduction and air quality measures associated with HGV movements are set out in <b>6.3.14.2_A Environmental Statement - Appendix 14.2 Construction Traffic Management Plan Revision A [EN010132/EX1/WB6.3.14.2_A]</b> (CTMP). Measures include:</p> <ul style="list-style-type: none"> <li>• When on site and when not in use, vehicle engines will be switched off;</li> <li>• Vehicles carrying material off-site will be sheeted to prevent the spread of dust;</li> <li>• In dry conditions, areas near to the site accesses will be sprayed with water supplied to prevent the spread of dust.</li> </ul> <p><b>6.2.17 Environmental Statement - Chapter 17 Air Quality [APP-055]</b> includes a full and detailed assessment that deals with air quality impact and effect at nearby sensitive receptors during the construction, operation and decommissioning phases of the Scheme. The assessment concluded that there are not any likely significant effects on air quality as a result of the Scheme.</p> <p>Following the implementation of the appropriate site-specific mitigation measures, the significance of the</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p>effects from dust and PM<sub>10</sub> emissions associated with the construction works is considered to be 'negligible' at all receptors, which is 'not significant' in EIA terms. This is based on the IAQM Guidance.</p> <p>As outlined within <b>6.2.17 Environmental Statement - Chapter 17 Air Quality [APP-055]</b> the number of vehicle and HGV movements associated with the construction phase of the Scheme have been determined to be below the industry standard screening thresholds for detailed assessment. Where the screening thresholds are not exceeded, the impact on air quality is determined to be negligible, and not significant.</p>
			<p>Some comments refer to soil compaction due to the use of HGV's on the roads.</p>	<p>The Scheme design includes temporary access tracks within the Sites that will be retained until decommissioning. Paragraph 4.5.65 of <b>6.2.4 Environmental Statement - Chapter 4 Scheme Description [APP-042]</b> provides a description of the internal access tracks. Topsoil from the access track routes will be recovered and placed in storage bunds before the track materials are laid. This topsoil will be retained to be replaced once the track material is recovered at decommissioning.</p> <p>These access tracks will prevent degradation of soils by passage of HGVs and will prevent road vehicles becoming bogged down within the Sites.</p>



Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
TRA-04	RR-088	Increase in HGV Traffic During Construction, Operation and Decommissioning	Comment refers to increased noise, personal safety concerns, and distress to horses as a result of increased HGV traffic on rural roads	<p>An Outline Construction Traffic Management Plan (CTMP) has been prepared to support the application in <b>6.3.14.2_A Environmental Statement - Appendix 14.2 Construction Traffic Management Plan Revision A [EN010132/EX1/WB6.3.14.2_A]. 3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>, provides (in Requirement 15 of Schedule 2) that "No part of the authorised development may commence until a construction traffic management plan for that part must be submitted to and approved by the relevant planning authority or, where the part falls within the administrative areas of multiple relevant planning authorities, each of the relevant planning authorities". It further provides that "The construction traffic management plan must be substantially in accordance with the outline construction traffic management plan."</p> <p>The outline CTMP submitted as part of the DCO application provides a framework for the management of construction vehicle movements to and from the Scheme, to ensure that the effects of the temporary construction phase on the local highway network are minimised and made acceptable.</p> <p>Additionally, the likely impacts of noise and vibration during each phase of the Scheme have been assessed in Section 15.7 of <b>6.2.15 Environmental Statement - Chapter 15 Noise and Vibration [APP-053]</b>. The noise</p>

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				and vibration effects are not anticipated to be significant.
TRA-05	RR-088	Access to the Scheme	Comment refers to increased safety and security risk to owned animals as a result of an additional access gate being put in.	<p>The Applicant notes this comment and has identified that the West Burton Solar Project does not impact directly upon the Party's land.</p> <p>Nevertheless, <b>6.3.14.2_A Environmental Statement - Appendix 14.2 Construction Traffic Management Plan Revision A [EN010132/EX1/WB6.3.14.2_A]</b> provides a framework for the management of construction vehicle movements to and from the Scheme, to ensure that the effects of the temporary construction phase are minimised, and to ensure the safe movement of all users.</p> <p>A detailed Construction Traffic Management Plan is secured through Requirement 15 in <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p>

### 3.16 Waste

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
WAS-01	RR-011; RR-021; RR-037; RR-044; RR-053; RR-070; RR-129; RR-131; RR-156; RR-157; RR-193; RR-205; RR-257; RR-272; RR-327	Landfill	Concern that the panels cannot be recycled and will be put in landfill.	The panels are predominantly made from recyclable materials. The Applicant refers the parties to Table 20.7 in <b>6.2.20 Environmental Statement - Chapter 20 Waste [APP-058]</b> which identifies the estimated volumes of waste that will arise from decommissioning. Approximately 95% of the panel weight is made from glass and metal frames, which can easily be reused and recycled. The remaining materials and electrical waste can be partially recycled at Waste Electrical and Electronic Equipment (WEEE) facilities.
			Some comments refer to battery recycling with claims that it isn't possible.	<p>Handling and recycling of waste electrical or electronic equipment (WEEE) is legislated by the Waste Electrical and Electronic Equipment Regulations 2013. Batteries, such as lithium-ion batteries "<i>are required to be separated from WEEE so that they can be recovered, recycled, or disposed of in accordance with the Waste Batteries and Accumulators Regulations 2009. This is most likely to be undertaken by the battery manufacturer or supplier</i>" (para. 20.3.4 of <b>6.2.20 Environmental Statement - Chapter 20 Waste [APP-058]</b>).</p> <p>Whilst the level of battery recycling in the UK is a developing market, the need for battery recycling from existing uses such as electric vehicles and battery</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p>storage is likely to generate an increase in recycling capacity and improvements to recycling and reuse capabilities in the lifetime of the Scheme. That notwithstanding, the worst-case scenario for Waste Electrical and Electronic Equipment (WEEE) recycling from the Scheme during decommissioning is assessed in paragraph 20.7.34-20.7.36 [APP-058] as being no greater than a slight or moderate adverse effect on hazardous (including WEEE) waste handling, which is not considered significant in EIA terms.</p>
			<p>Some comments refer to general questions regarding what happens to the panels at decommissioning stage- disposal, recycling etc.</p>	<p><b>7.2 Outline Decommissioning Statement [APP-310]</b> sets out the principles of decommissioning and environmental considerations (see paras. 2.1.1 to 2.1.9) and provides a summary of potential mitigation and management measures during decommissioning in Table 3.1. It also sets out how roles, responsibilities and actions required in respect of implementation of the mitigation measures will be managed, along with principles for monitoring and reporting. By way of example and as contained within Table 3.1, provision is made that <i>"Infrastructure such as PV panels and battery storage units will be removed and recycled as far as practical and in accordance with legislation and guidance applicable at the time"</i>.</p> <p>Further details will be provided in the final decommissioning plan submitted for approval prior to</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
				<p>decommissioning. The commitment for the final decommissioning plan to be prepared and to be substantially in accordance with the Outline Decommissioning Statement is secured by Requirement 21 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p> <p>For the purpose of assessment in the ES, it is assumed 75-82.6% of the materials from the Scheme will be recycled, as set out in paragraphs 20.5.5 and 20.5.10 of <b>6.2.20 Environmental Statement – Chapter 20 Waste [APP-058]</b>.</p>
			<p>Some comments refer to unmaintained panels if the Scheme is not looked after.</p>	<p>The Scheme is required to be maintained in the manner set out in <b>7.14_A Outline Operational Environmental Management Plan Revision A [EN010132/EX1/WB7.14_A]</b> (OOEMP). This Plan requires there to be a regular schedule of visual inspection of all equipment (Tables 3.4 and 3.11) and requires unusable equipment to be replaced, removed, and recycled as far as practical (Table 3.13). These measures therefore will ensure that the Scheme is adequately maintained, and that unusable equipment is removed from site. The measures set out in the OOEMP are secured through Requirement 14 of Schedule 2 to <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p>

Reference	Relevant Representation(s) Reference	Issue	Summary of Issue Raised	Applicant's Response
			Some comments refer to hazardous waste becoming an issue for landfill.	The worst-case scenario for hazardous waste as a result of handling Waste Electrical and Electronic Equipment (WEEE) from the Scheme during decommissioning is assessed in paragraph 20.7.34-20.7.36 <b>6.2.20 Environmental Statement - Chapter 20 Waste [APP-058]</b> as being no greater than a slight or moderate adverse effect on hazardous (including WEEE) waste handling, which is not considered significant in EIA terms.
WAS-02	RR-021; RR-156; RR-157	Maintenance of Scheme	Concern that maintenance of panels needs to be considered.	The Scheme is required to be maintained in the manner set out in <b>7.14_A Outline Operational Environmental Management Plan Revision A [EN010132/EX1/WB7.14_A]</b> (OOEMP). This Plan requires there to be a regular schedule of visual inspection of all equipment (Tables 3.4 and 3.11) and requires unusable equipment to be replaced, removed, and recycled as far as practical (Table 3.13). These measures therefore will ensure that the Scheme is adequately maintained, and that unusable equipment is removed from site. The measures set out in the OOEMP are secured through Requirement 14 of Schedule 2 to <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> .
			Some comments refer to the panels not lasting the 40 year operational phase.	Waste impacts arising from the maintenance and replacement of broken or faulty equipment on the Scheme has been considered in Section 20.7 of <b>6.2.20</b>

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				<p><b>Environmental Statement - Chapter 20 Waste [APP-058]</b> and concludes that there is no greater than a slight adverse effect (para. 20.7.19) on waste handling as a result of the Scheme. This is not considered to be significant.</p> <p>Based on current technology, the lifespan of the solar panels to be used for the Scheme is estimated to be approximately 40 years, with a "worst-case" estimated failure rate of 0.4% per year. This is shown in Table 20.6 [APP-058] which identifies an estimated volume of replacement PV modules of 130 tonnes per annum, the vast majority (approx. 95%) of which consists glass and metal frames, which are inert, and can easily be reused and recycled. However, it is considered likely that the majority of the solar panels used for the Scheme will be able to continue operating for longer than 40 years and therefore a 60 year time period has been proposed as the maximum time the Scheme can be in operation prior to being decommissioned.</p>
			Some comments refer to washing the panels.	The Applicant confirms that panels will need to be washed periodically throughout their operational lifetime. Table 20.6 [APP-058] identifies an estimated requirement of 5,000m <sup>3</sup> of water per annum for washing panels across the entire Scheme. This is not considered to be a significant quantity, nor is it considered to have an impact on waste management as

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				this water will run off panels and drain in the same manner as rainwater.
			Some comments refer to the land below the panels becoming barren on purpose to ease maintenance.	Section 4.7 of <b>7.3-A Outline Landscape and Ecological Management Plan [EN010132/EX1/WB7.3_A]</b> sets out the habitat management methods for the grassland to be created beneath the panels. In the Applicant's experience monitoring over 100 solar farms, given appropriate management, diverse grassland habitats can be created in these areas. Delivery of the detailed Landscape and Ecological Management Plan is secured through Requirement 7 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b> .
WAS-03	RR-157	Materials	Concern that Solar panels contain rare earth minerals, some of which are classified by the Environment Agency as "hazardous waste".	The Applicant recognises the waste from electrical equipment including energy storage units and PV modules has the potential to contain toxic or hazardous materials that could be of risk to electrical recycling handlers (see para. 20.9.6 of <b>6.2.20 Environmental Statement - Chapter 20 Waste [APP-058]</b> ). As a result, <b>7.2 Outline Decommissioning Statement [APP-310]</b> sets out the principles of decommissioning and environmental considerations (see paras. 2.1.1 to 2.1.9) and provides a summary of potential mitigation and management measures during decommissioning through Table 3.1. It also sets out how roles, responsibilities and actions required in respect of



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				<p>implementation of the mitigation measures will be managed, along with principles for monitoring and reporting. By way of example and as contained within Table 3.1, provision is made that <i>"Infrastructure such as PV panels and battery storage units will be removed and recycled as far as practical and in accordance with legislation and guidance applicable at the time"</i>.</p> <p>Further details will be provided in the final decommissioning plan submitted for approval prior to decommissioning. The commitment for the final decommissioning plan to be substantially in accordance with the Outline Decommissioning Statement is secured by Requirement 21 of Schedule 2 of <b>3.1_A Draft Development Consent Order Revision A [EN010132/EX1/WB3.1_A]</b>.</p>