

# West Burton Solar Project

## The Applicant's Responses to Written Representations and other submissions at Deadline 1 Part 3

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## Issue Sheet

**Report Prepared for: West Burton Solar Project Ltd.  
Examination Deadline 3**

### **The Applicant's Responses to Written Representations and Other Submissions at Deadline 1: Part 3**

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## 1 Introduction and Summary

### 1.1 Introduction

- 1.1.1 This document provides West Burton Solar Project Limited (the 'Applicant's') response to the Written Representations (the 'WRs') and any other documents submitted to the Planning Inspectorate (PINS) by 24 November 2023 and 7 December 2023, relating to Examination Deadlines 1 and 1A respectively for the Development Consent Order Application (the 'Application') for West Burton Solar Project (the 'Scheme').
- 1.1.2 The Applicant's Response to Local Impact Reports from the host local authorities have been responded to separately in **WB8.1.20 The Applicant's Response to Local Impact Reports [EN010132/EX3/WB8.1.20]**.
- 1.1.3 A total of 97 WRs and other documents were submitted to the Examining Authority by Interested Parties in response to the Scheme. WRs were published on 29 November 2023 and 12 December 2023 to the Planning Inspectorate's website (PINS reference: EN010132).

### 1.2 Structure of the report

- 1.2.1 This Part 3 document provides responses from the Applicant to the matters raised in the Written Representations and is structured as follows:
- Table 1.1 lists the 'Theme Options' through which those WRs from member of the public and all remaining organisations and businesses are categorised into and responded to in this document as Section 2.
  - WRs received by host local authorities, all other statutory consultees, international agencies, undertakers, elected representatives, community organisations, and those whose interest would be affected by the Order have been responded to separately in the document **WB8.1.17 The Applicant's Response to Written Representations Part 1 [EN010132/EX3/WB8.1.17]**.
  - WRs received by the group 7000 Acres have been responded to separately in the document **WB8.1.18 The Applicant's Response to Written Representations Part 2 [EN010132/EX3/WB8.1.18]**.
- 1.2.2 References to the Application and Examination documentation, as submitted to the Planning Inspectorate, are provided in accordance with the referencing system as set out in the Planning Inspectorate's 'West Burton Solar Project Examination Library'.

**Table 1.1: List of Theme Options in which Written Representations and Other Submissions from members of the public and all remaining organisations and businesses are categorised into and responded to.**

Theme Options	Acronym	Written Representations responded to through the Theme Options
Air Quality	AIR-XX	REP1A-051; REP1A-057
Alternatives and Design Evolution	ALT-XX	REP1-096; REP1-098; REP1-102; REP1A-033; REP1A-041; REP1A-043; REP1A-044; REP1A-046; REP1A-047; REP1A-049; REP1A-050; REP1A-054; REP1A-056; REP1A-057; REP1A-059; REP1A-063; REP1A-065; REP1A-066; REP1A-067
Climate Change	CLI-XX	REP1-097; REP1-098; REP1A-033; REP1A-043; REP1A-045; REP1A-051; REP1A-057; REP1A-067
Cultural Heritage	CUL-XX	REP1A-033; REP1A-043; REP1A-059
Ecology and Biodiversity	ECO-XX	REP1-095; REP1-096; REP1-103; REP1A-033; REP1A-043; REP1A-044; REP1A-045; REP1A-046; REP1A-051; REP1A-053; REP1A-056; REP1A-057; REP1A-062; REP1A-063; REP1A-066; REP1A-067
Energy Need	ENE-XX	REP1-095; REP1-096; REP1-098; REP1A-033; REP1A-041; REP1A-042; REP1A-045; REP1A-046; REP1A-051; REP1A-057; REP1A-063; REP1A-066; AS-014
General Comments	GEN-XX	REP1-092; REP1-093; REP1-094; REP1-095; REP1-096; REP1-097; REP1-098; REP1-101; REP1-102; REP1-103; REP1-104; REP1A-033; REP1A-036; REP1A-037; REP1A-041; REP1A-043; REP1A-044; REP1A-045; REP1A-046; REP1A-047; REP1A-049; REP1A-051; REP1A-053; REP1A-054; REP1A-056; REP1A-057; REP1A-059; REP1A-061; REP1A-063; REP1A-065; REP1A-066; REP1A-067
Glint and Glare	GLI-XX	REP1-086; REP1A-033; REP1A-057
Hydrology, Flood Risk and Drainage	HFD-XX	REP1-087; REP1-088; REP1A-033; REP1A-037; REP1A-051; AS-015
Landscape and Visual Impact	LAN-XX	REP1-086; REP1-091; REP1-095; REP1-096; REP1-103; REP1A-033; REP1A-040; REP1A-041; REP1A-043; REP1A-045; REP1A-046; REP1A-051; REP1A-057; REP1A-059; REP1A-063; REP1A-066

Theme Options	Acronym	Written Representations responded to through the Theme Options
Noise and Vibration	NOI-XX	REP1A-048; REP1A-056; REP1A-057
Other Environmental Matters	OEM-XX	REP1-086; REP1-102; REP1A-033; REP1A-041; REP1A-043; REP1A-044; REP1A-051; REP1A-054; REP1A-056; REP1A-057; REP1A-061; REP1A-062; REP1A-065
Principle of Development	PRI-XX	REP1-096; REP1-097; REP1-102; REP1-103; REP1A-033; REP1A-043; REP1A-045; REP1A-046; REP1A-051; REP1A-053; REP1A-055; REP1A-057; REP1A-059; REP1A-065; REP1A-066; REP1A-067
Socio-Economics, Tourism and Recreation	STR-XX	REP1-086; REP1-089; REP1-090; REP1-089; REP1-095; REP1-096; REP1-097; REP1-102; REP1-103; REP1A-033; REP1A-041; REP1A-042; REP1A-043; REP1A-045; REP1A-046; REP1A-047; REP1A-048; REP1A-051; REP1A-053; REP1A-055; REP1A-056; REP1A-057; REP1A-065; REP1A-066; REP1A-067
Soils and Agriculture	SOI-XX	REP1-086; REP1-089; REP1-090; REP1-092; REP1-093; REP1-096; REP1-096; REP1-097; REP1-098; REP1-102; REP1-103; REP1A-033; REP1A-037; REP1A-040; REP1A-041; REP1A-042; REP1A-043; REP1A-044; REP1A-045; REP1A-046; REP1A-047; REP1A-048; REP1A-049; REP1A-050; REP1A-051; REP1A-053; REP1A-054; REP1A-055; REP1A-056; REP1A-057; REP1A-063; REP1A-065; REP1A-066; REP1A-067; AS-014
Transport and Access	TRA-XX	REP1-096; REP1-102; REP1-103; REP1A-033; REP1A-039; REP1A-043; REP1A-044; REP1A-045; REP1A-046; REP1A-047; REP1A-049; REP1A-051; REP1A-056; REP1A-057; REP1A-066; REP1A-067
Waste	WAS-XX	REP1-103; REP1A-046; REP1A-047; REP1A-057; REP1A-066; REP1A-067

## 2 The Applicant's Thematic Responses to Members of the Public and All Remaining Organisations and Businesses

### 2.1 Air Quality

Table 2.1: Applicant's Response to Air Quality Themed Issues

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
AIR-01	REP1A-051; REP1A-057	Air Pollution	Comments raise concern about air pollution from construction traffic	<p>Noise reduction and air quality measures associated with HGV movements are set out in <b>6.3.14.2_B Environmental Statement - Appendix 14.2 Construction Traffic Management Plan Revision B [EN010132/EX3/WB6.3.14.2_B]</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 no likely significant effects on air quality as a result of the Scheme. Following the implementation of the appropriate site-specific mitigation measures, the</p>

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
				<p>significance of the effects from dust and PM10 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. 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>



## 2.2 Alternatives and Design Evolution

**Table 2.2: Applicant's Response to Alternatives and Design Evolution Themed Issues**

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
ALT-01	REP1-092; REP1-095; REP1-096; REP1-098; REP1-100; REP1-102; REP1A-041; REP1A-043; REP1A-044; REP1A-046; REP1A-047; REP1A-049; REP1A-050; REP1A-054; REP1A-056; REP1A-057; REP1A-058; REP1A-059; REP1A-063; REP1A-064; REP1A-065; REP1A-066; REP1A-067	Alternative Sites	Solar panels should be sited on rooftops.	<p>Please refer to the Applicant's responses within <b>WB8.1.5 Summary of Oral submissions made by Interested Parties at Open Floor Hearing 1 and the Applicant's Response [REP1-051]</b>, and <b>WB8.1.6 Written Summary of the Applicant's Oral Submissions &amp; Responses at Issue Specific Hearing 1 and Responses to Action Points [REP1-052]</b>, in particular Section 4.</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". 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 November 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</p>
			Solar panels should be sited on brownfield land.	
			Comments state that there are more innovative ways to install solar panels such as the full length of motorway central reservations.	
			Solar panels should be sited on residential dwellings.	
			Solar panels should be sited on commercial buildings and carparks.	
			Comments refer to solar Schemes should be located towards the SE of England where national energy demand is highest	
Comments raise concerns or scepticism about the site selection process				

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
				<p>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 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 (2011) and NPS EN-1 4.3.9 to 4.3.29 (November 2023).</p>

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
ALT-02	REP1-092; REP1-096; REP1-098; REP1-099; REP1-100; REP1A-043; REP1A-046; REP1A-047; REP1A-050; REP1A-056; REP1A-057; REP1A-064; REP1A-066; REP1A-067	Efficiency of Solar	Some comments refer to nuclear power as a suitable alternative, or the only form of reliable low carbon electricity generation.	Section 5.4 of <b>7.11 Statement of Need [APP-320]</b> analyses the contribution that nuclear power can make to the urgent need to decarbonise and concludes that the development timeframes associated with that technology mean that it is highly unlikely that new nuclear will make any contribution to decarbonisation in the critical pre-2030 timeframe beyond the commissioning of Hinkley Point C, currently scheduled for 2028. Table 7.1 of <b>WB7.11 Statement of Need [APP-320]</b> shows the electricity generated per hectare by different low-carbon technologies.
			Comments refer to wind power being a more suitable alternative.	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 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 6.2.4 <b>Environmental Statement - Chapter 4 Scheme</b>

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
				<p><b>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>
			Comments state solar needs to be coupled to long-term energy storage for it to be viable	<p>Section 11.5 in <b>7.11 Statement of Need [APP-320]</b> explains how electricity storage (BESS) will play an important role in the development of a low-carbon GB energy system. Electricity storage may be connected as a standalone asset or collocated with a renewable generation scheme. Because the Scheme's grid connection agreement provides both import and export capacity, it enables the Scheme to contribute to meeting the national need for electricity storage by including, as associated development, an electricity storage asset which supports the operation of the principal solar development and provides the ability to balance the electricity produced by the solar scheme, with demand on the National Electricity Transmission System.</p>
ALT-03	REP1A-033	Alternative siting of BESS	The BESS should be located at West Burton Power Station	<p>Section 11.5 in <b>7.11 Statement of Need [APP-320]</b> explains how electricity storage (BESS) will play an important role in the development of a low-carbon GB energy system. Electricity storage may be connected as a standalone asset or collocated with a renewable generation scheme. Because the Scheme's grid connection agreement provides both import and export capacity, it enables the Scheme to contribute to</p>

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
				<p>meeting the national need for electricity storage by including, as associated development, an electricity storage asset which supports the operation of the principal solar development and provides the ability to balance the electricity produced by the solar scheme, with demand on the National Electricity Transmission System.</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, including at decommissioned power stations, 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 (2011) and NPS EN-1 4.3.9 to 4.3.29 (November 2023).</p>

## 2.3 Climate Change

**Table 2.3: Applicant's Response to Climate Change Themed Issues**

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
CLI-01	REP1-097; REP1-098; REP1A-043; REP1A-045; REP1A-051; REP1A-057; REP1A-067	Embodied Carbon	Some comments raise concerns about the carbon dioxide emissions related to material sourcing, processing, manufacture, and transport of the panels to site.	This has been accounted for within Section 7.8 of <b>6.2.7_A Environmental Statement - Chapter 7 Climate Change Revision A [REP1-012]</b> which shows that the savings in CO <sub>2</sub> e emissions far outweigh those generated by material sourcing, transport and construction.
CLI-02	REP1-097; REP1A-043	Carbon Calculations	Comments state that carbon calculations must include a whole life carbon cost.	The operational CO <sub>2</sub> e from the development has been accounted for including for embodied carbon in replacement panels and site operations. CO <sub>2</sub> e from decommissioning is also considered within the ES. A detailed assessment is contained in Section 7.8 of <b>6.2.7_A Environmental Statement - Chapter 7 Climate Change Revision A [REP1-012]</b> .
			Comments state that calculations are incorrect as they do not account for low 11% load factor	The Applicant respectfully disagrees with this position. Paragraph 7.8.61 of <b>6.2.7_A Environmental Statement - Chapter 7 Climate Change Revision A [REP1-012]</b> estimated the Scheme will produce 583,000MWh in its first year of operation. This is derived from the installed capacity of the Scheme operating with an annual load factor of 10.6%. As such, the annual load factor has been included in

				calculations of carbon emissions saved as a result of the operation of this Scheme over generating energy by CCGT.
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## 2.4 Cultural Heritage

**Table 2.4: Applicant's Response to Cultural Heritage Themed Issues**

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
CUL-01	REP1A-033; REP1A-043; REP1A-059	Impact on heritage assets	Comments refer to impacts on the Bishop's Palace at West Burton 3	<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. The Applicant considers that the various Scheduled areas can only be experienced individually, and that post-medieval and modern interventions have significantly altered the character of the former medieval park, so that 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. 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 Scheduled Monument's historical and functional association in consideration of setting. Consequently, the Applicant considers that the Scheme would cause less than substantial harm (at the upper end) to the</p>



				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 <b>[APP-117 to APP-119]</b> ).
			Comments refer to general impacts on heritage assets	<p>The only 'significant' effects identified (once mitigation is in place) due to impacts to the setting of a designated heritage asset are at the medieval bishop's palace and deer park, Stow Park (NHLE 1019229) <b>(6.2.13 Environmental Statement - Chapter 13_Cultural Heritage [APP-051])</b>.</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 opportunity to protect archaeological remains that are currently at risk of destruction from agricultural activity <b>6.2.13 Environmental Statement - Chapter 13 Cultural Heritage [APP-051]</b>, Paragraphs 13.7.43 and 13.7.44. <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</p>

				mechanism for archaeological remains to be recorded or preserved in situ.
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## 2.5 Ecology and Biodiversity

**Table 2.5: Applicant's Response to Ecology and Biodiversity Themed Issues**

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
ECO-01	REP1-095; REP1-096; REP1-103; REP1A-037; REP1A-043; REP1A-044; REP1A-045; REP1A-046; REP1A-051; REP1A-053; REP1A-056; REP1A-057; REP1A-058; REP1A-062; REP1A-063; REP1A-064; REP1A-066; REP1A-067	Ecological Impacts	Some 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>WB7.3_B Outline Landscape and Ecological Management</b></p>

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
				<p><b>Plan Revision B [EN010132/EX3/WB7.3_B]</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_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C]</b>.</p>
			<p>Comments refer to impacts on wildlife routes.</p>	<p>The majority of animal species in the local area 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 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_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C]</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</i></p>

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
				<i>the administrative areas of multiple relevant planning authorities, each of the relevant planning authorities."</i>
			Comments refer to destruction of flora and fauna.	<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_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C]</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>

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
				<i>consultation with the relevant statutory nature conservation body."</i>
			Comments refer to impact on aquatic flora and fauna in dykes, ditches, and the River Till as a result of the Scheme	<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>These additional mitigation measures are further detailed within <b>7.17 Outline Ecological Protection and Mitigation Strategy [APP-326]</b> and <b>WB7.3_B Outline Landscape and Ecological Management Plan Revision B [EN010132/EX3/WB7.3_B]</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_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C]</b>.</p> <p>As mentioned above, 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.</p>

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
				In particular, terrestrial and aquatic invertebrates, botanical diversity, small mammals and many species of bird all stand to benefit.
			Comments refer to specific ecological impacts from EMF	<p>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.</p> <p>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>).</p> <p>Please refer to Appendix 1 - Risk Assessment of EMF Impacts on Fish within <b>8.1.17 Applicant's Responses to Written Representations Part 1 [EN010132/EX3/WB8.1.17]</b>.</p>

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
ECO-02	REP1-094; REP1-095; REP1A-043; REP1A-056; REP1A-067	Loss of vegetation	Concerns regarding impacts on nesting birds, hibernating hedgehogs, dormice and other small mammals and insects due to removal of hedgerows.	<p>Some very minor hedgerow removal during the operation of the Scheme 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 Hedgerow Removal Plans <b>[REP1-042]</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_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C]</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-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>



## 2.6 Energy Need

**Table 2.6: Applicant's Response to Energy Themed Issues**

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
ENE-01	REP1-092; REP1-096; REP1-098; REP1-100; REP1A-042; REP1A-045; REP1A-057; AS-014	Meeting national energy need	Comments refer to renewable energy not being able to meet the energy need.	<p>Please refer to the Applicant's responses within <b>WB8.1.5 Summary of Oral submissions made by Interested Parties at Open Floor Hearing 1 and the Applicant's Response [REP1-051]</b>, and <b>WB8.1.6 Written Summary of the Applicant's Oral Submissions &amp; Responses at Issue Specific Hearing 1 and Responses to Action Points [REP1-052]</b>, in particular Section 4.</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 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</p>

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
				generation mix, and risks associated with technology developments, are analysed in Chapter 5 of <b>7.11 Statement of Need [APP-320]</b> .
ENE-02	REP1-092; REP1-096; REP1-099; REP1-103; REP1A-042; REP1A-045; REP1A-046; REP1A-051; REP1A-057; REP1A-063; REP1A-066	Solar output	Comments refer to solar panels only producing around 11% of their rated 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.
			Comments refer to solar not generating power when demand is highest.	Figure 8.2 of <b>7.11 Statement of Need [APP-320]</b> shows how solar is expected to work alongside other renewable and low-carbon assets to meet demand throughout the year, providing more energy in times where wind energy is reduced. The inclusion of batteries as part of the Scheme will allow the Scheme to store energy when it is in abundance and release it to the grid when it is needed.
ENE-03	REP1A-033; REP1A-051	Cost of energy	Comments refer to the Scheme not reducing, or increasing the cost of energy for consumers	<b>7.11 Statement of Need [APP-320]</b> describes that 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> . 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: "If we're going to get prices down and keep

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
				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." Paragraph 7.6.9 [APP-320] 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.
ENE-04	REP1-099; REP1A-033; REP1A-041; REP1A-045; REP1A-051	Use or effectiveness of the BESS	Comments state that the financial viability of the BESS is reliant on charging from the National Grid rather than surplus from the Scheme	Chapter 11 of <b>7.11 Statement of Need [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 [APP-320] addresses relevant points in relation to projections of storage capacity in the UK. Paragraph 11.5.1 [APP-320] 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. The BESS will provide flexibility for the Scheme and the electricity system in response to local and national system conditions whenever the system requires flexibility.
			Comments suggest that the BESS will only be useful for a few hours each day	

## 2.7 General Comments

**Table 2.7: Applicant's Response to General Themed Issues**

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
GEN-01	REP1-086; REP1-092; REP1-095; REP1-096; REP1-097; REP1-098; REP1-099; REP1-100; REP1-102; REP1-103; REP1A-037; REP1A-041; REP1A-043; REP1A-044; REP1A-045; REP1A-046; REP1A-051; REP1A-053; REP1A-054; REP1A-056; REP1A-057; REP1A-058; REP1A-059;	Cumulative Development	Concern that the number of Solar developments should be treated as one site.	<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>The cumulative impacts of the four NSIPs Cottam, Gate Burton, West Burton and Tillbridge have been considered within the <b>WB8.1.9_B Report on the Interrelationship with Other National Infrastructure Projects [REP2-010]</b>.</p>
			Some comments refer to the cumulative area of development equating to the largest solar installation in Europe.	<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</p>

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
	REP1A-063; REP1A-064; REP1A-066			<p>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 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>
			Comments that cumulative development will change the character and nature of the area for 80+ years.	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</b>

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
				<p><b>Impact Assessment [APP-046], 6.3.8.2 Environmental Statement - Appendix 8.2 Assessment of Potential Landscape Effects [APP-073] and 6.3.8.3 Environmental Statement - Appendix 8.3 Assessment of Potential Visual Effects [APP-074].</b> 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>Comments refer to cumulative impacts from four NSIP relating heritage, socio-economics and tourism.</p>	<p>Section 13.10.8 of 6.2.13 <b>Environmental Statement - Chapter 13 Cultural Heritage [APP-051]</b> identified that there was potential for up to Moderate Adverse cumulative effect from the Scheme and the Cottam Solar Project where views from the Lincoln Cliff contribute to the setting of the asset on the Roman villa west of Scampton Cliff Farm (NHLE 1005041). Following a site visit during the winter period of 2023, when foliage coverage was at its lowest, and with consideration to the design proposals of the Cottam and West Burton Schemes, including landscape mitigation, it is considered that there would be a Slight</p>

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
				<p>Adverse cumulative impact at the Roman Villa west of Scampton (NHLE 1005041).</p> <p>Cumulative effects have been assessed in Section 18.10 of <b>6.2.18 Environmental Statement – Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b> and are compiled and presented in full in Table 18.28 <b>[APP-056]</b>. This table includes for both significant beneficial and adverse effects to socio-economics, tourism and recreation as a result of the cumulatively assessed schemes set out in Table 18.25 (for construction), 18.26 (for operation) and 18.27 (for decommissioning) <b>[APP-056]</b>.</p>
			<p>Comments refer to construction period of 5-7 years across four schemes causing disruption and danger.</p>	<p>The Transport Assessment within <b>6.3.14.1_A Environmental Statement - Appendix 14.1 Transport Assessment Revision A [REP1-014]</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> <p>An Outline Construction Traffic Management Plan (CTMP) has been prepared to support the application within <b>6.3.14.2_B Environmental Statement - Appendix 14.2 Construction Traffic Management Plan Revision B [EN010132/EX3/WB6.3.14.2_B]</b>. This document is secured by Requirement 13 Schedule 2 of <b>3.1_C Draft Development Consent Order Revision C</b></p>

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
				<p><b>[EN010132/EX3/WB3.1_C]</b> and 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 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>
			Comments refer to confusion caused by similar names and numbering of solar projects.	The Applicant has not intentionally caused confusion with project naming and numbering. The Applicant's choice for the naming of the West Burton Solar Project is solely based on the grid connection being located at West Burton Power Station. With regard to numbering, the Applicant assumes this relates to the project reference number EN010132 for West Burton Solar Project. This project reference number has been allocated by the Planning Inspectorate and therefore has not been chosen by the Applicant.
			Comments state that there is very minimal distance separating four NSIP projects.	A cumulative effects assessment has been prepared for the Application within the Environmental Statement <b>[APP-039 to APP-061]</b> . Cumulative effects



Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
				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> ). 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.
GEN-02	REP1-096; REP1-097; REP1-098; REP1A-043	Material Sourcing	Comments refer to export restrictions imposed by China affecting national security.	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." The detailed Skills, Supply Chain and Employment Plan is secured through Requirement 20 in Schedule 2 of the <b>3.1_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C]</b> .
GEN-03	REP1-093; REP1-094;	Site visit location	Comment refers to main viewing points along the B1398.	The Applicant notes this comment.

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
	REP1-101; REP1-104		Comment refers to site visits at Willingham by Stow village and Marton and Fillingham Lanes	The Applicant notes this comment.
			Comment refers to site visit location around West Burton Power Station	The Applicant notes this comment.
			Comment refers to site visit locations including Viewpoints 6, 15, 21, 23, 26, 33, 43, 45, 46, 53, 54, 55	The Applicant notes this comment.
GEN-04	REP-096	Location of development	Some comments refer to the site being chosen as it is one of the least populated counties and therefore fewer objections would be received against development.	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.
GEN-05	REP1-096; REP1-097; REP1-103; REP1A-046; REP1A-047; REP1A-061; REP1A-066	Lifespan of equipment	Some comments refer to solar panel lifespan being 20 years and will need to be replaced twice.	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 of <b>6.2.20 Environmental Statement - Chapter 20 Waste [APP-058]</b> 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

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
				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.
			Comments raise questions about the lifespan of the batteries in the BESS	The Applicant has assessed the requirement to replace the batteries as part of the Scheme once during its operational lifetime in Table 7.24 of <b>6.2.7_A ES Chapter 7 Climate Change Revision A [REP1-012]</b> . The waste streams arising from the need to replace batteries will not have any greater level of impact on waste handling than at either construction or decommissioning. In addition, the potential need for a further replacement of the batteries after 40 years was considered within <b>WB6.2.23_B ES Chapter 23 Summary of Significant Effects Revision B [EN010132/EX3/WB6.2.23_B]</b> and this is unlikely to give rise to likely significant GHG emissions. As such, these impacts are not significant effects, as assessed in para. 20.7.17-21 in <b>6.2.20 ES Chapter 20 Waste [APP-058]</b> . Replacement of broken or faulty equipment will be through a specialist recycling company, and suitable mitigation is secured in <b>7.14_B Outline Operational Environmental Management Plan Revision B [EN010132/EX3/WB7.14_B]</b> by way of Requirement 14 of Schedule 2 to <b>3.1_C Draft</b>

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
				<b>Development Consent Order Revision C [EN010132/EX3/WB3.1_C].</b>
GEN-06	REP1-097; REP1A-041	Lack of information	<p>Some comments refer to lack of information being submitted as part of the application.</p> <p>Some comments refer to the draft DCO not containing final documents and therefore an informed decision cannot be made.</p>	<p>The Applicant respectfully disagrees with these comments.</p> <p>The DCO Application has been accepted for examination, demonstrating it is a level of completeness and detail for the Examining Authority to make an informed decision. The Applicant has also made sure to provide additional information to the examination as requested by the examining authority, host authorities and statutory bodies.</p> <p>Use of the Rochdale Envelope is an approach recognised by PINS, as set out within Section 4.3 of <b>ES Chapter 4: Scheme Description [APP-042]</b>. The need for flexibility in design, layout and technology is recognised in National Policy Statement EN-1 as elements of a development may not be finalised.</p> <p>As the detailed design for the Scheme has not yet been finalised, and as is typical for energy DCOs, outline management plans have been prepared. Final versions of management plans are secured through the requirements set out in Schedule 2 of <b>3.1_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C]</b> and the final plans must be substantially in accordance with the outline plans.</p>

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
			Comment claims there is little or no academic research that supports the claims made in the application	<p>The Applicant respectfully disagrees with this comment.</p> <p>The assessments and statements within this DCO application are based on industry guidance and policy, as directed and evidenced by academic research, industry application, and professional judgement.</p>
GEN-07	REP1-102	Compulsory acquisition	Comments state that compulsory acquisition is impacting lives and livelihoods.	<p>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 the necessary 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_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C]</b> to enable the Scheme to be delivered without impediment. <b>4.1 Statement of Reasons [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>
GEN-08	REP1-095; REP1A-037; REP1A-041; REP1A-045;	Application / DCO process	Comments state that community has not properly engaged with the application due to a complicated	The Applicant acknowledges this comment and 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. This has been

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
	REP1A-046; REP1A-049; REP1A-051; REP1A-057; REP1A-059; REP1A-063; REP1A-065; REP1A-066; REP1A-067		<p>process and closeness of deadlines on multiple NSIP Schemes.</p> <p>Comments suggest that the DCO process is undemocratic or biased against residents</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>As stated in paragraph 5.2.2 of <b>7.5_A Planning Statement [EN010132/EX3/WB7.5_A]</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.</p> <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</p>

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
				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".
GEN-09	REP1-086; REP1A-051; REP1A-057; REP1A-058	Consultation	Concerns that consultation areas for Schemes did not cover enough people who are affected by the Scheme, or were not detailed enough.	<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> <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>
		Consultation feedback	Concerns that consultation feedback was not received.	

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
				<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 at pp.36-43 of 5.7 Consultation Report - Appendix 5.7 Phase Two Community Consultation Materials - Part 3 of 3 <b>[APP-031]</b>.</p> <p>Chapter 11 of 5.1 Consultation Report <b>[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 5.12 Consultation Report -</p>



Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
				<p>Appendix 5.12 - Section 47 Applicant Response <b>[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>
GEN-10	REP1A-041; REP1A-049	Developer scrutiny	Comments refer to examination of the developers with respect to modern slavery and financial due diligence	<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 "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." Paragraph 5.4.7 <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." The detailed Skills, Supply Chain and Employment Plan is secured through Requirement 20 in Schedule 2 of the <b>3.1_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C]</b>.</p>

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
				<p>With regard to financial matters, 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 <b>[APP-020]</b> also sets out the estimated costs of the Scheme and how it will be funded. 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>

## 2.8 Glint and Glare

**Table 2.8: Applicant's Response to Glint and Glare Themed Issues**

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
GLI-01	REP1-086	Glint and glare impacts	Comments refer to drivers being affected by glint and glare.	<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 [REP1-026 to REP1-031]</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 <b>16.10.3 of 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, which has not been assessed due to it being located</p>

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
				more than 1km away from the panelled area at the West Burton 1 Site.
			Comments refer to glint and glare impacts on aviation	<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 <b>6.3.16.1 Environmental Statement - Appendix 16.1 Solar Photovoltaic Glint and Glare Study [APP-132]</b> . Quantitative Federal Aviation Association (FAA) guidance has been used to assess the potential effects upon aviation activity, in addition to the Pager Power methodology which has been derived from industry best practice and stakeholder consultation.
GLI-02	REP1A-057	Health impacts	Comments raise concern about health impacts and eye damage from glint and glare	Solar reflections originating from solar panels will be similar to the intensity of reflections originating from a body of water. Therefore, effects 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> .

## 2.9 Hydrology, Flood Risk and Drainage

**Table 2.9: Applicant's Response to Hydrology, Flood Risk and Drainage Themed Issues**

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
HFD-01	REP1-086; REP1-087; REP1-088; REP1-092; REP1-095; REP1A-037; AS-015	Flood Risk	Comment refers to historic flooding of the 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> .
HFD-02	REP1-087	Flood Risk Mitigation	Comments seek clarity as to the measures to be put in place to prevent flooding of farmland.	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> .

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
HFD-03	REP1A-033; REP1A-037; REP1A-051	Increased flood risk	Comments refer to the panels increasing surface water flood risk and impacts on farmland and accessing rural areas near the rivers	<p>The proposed solar schemes will not contribute to an exacerbation of flooding in the area. This is also the case for the other stated schemes.</p> <p>The embedded mitigation detailed in section 10.7 of <b>6.2.10 ES Chapter 10 Hydrology, Flood Risk and Drainage [APP-048]</b> will ensure there is no loss of flood storage as a result of the development and that the existing surface water run-off regime will be mimicked.</p> <p>There is no UK environmental managing guidance with regards to runoff from solar panel installations. However, research undertaken in the United States (US) by Cook and McCuen considers the points raised in this comment and states within their conclusions that;</p> <p>'The addition of solar panels over a grassy field does not have much of an effect on the volume of runoff, the peak discharge, nor the time to peak. With each analysis, the runoff volume increased slightly but not enough to require storm-water management facilities', and continue to recommend that the vegetation cover beneath the panels is well maintained or that a buffer strip be placed after the most down gradient row of panels.</p> <p>Point 3 of paragraph 10.8.1 within <b>6.2.10 ES Chapter 10 Hydrology, Flood Risk and Drainage [APP-048]</b> includes provision for suitable planting (such as a</p>

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
				<p>wildflower or grass mix) to ensure that the underlying ground cover is strengthened and is therefore unlikely to generate surface water runoff rates beyond the baseline scenario.</p> <p>The proposed drainage strategy is detailed within Section 5.0 of <b>6.3.10.1 ES Appendix 10.1 Flood Risk Assessment and Drainage Strategy Report [APP-089]</b>.</p> <p>Section 5.0 'Drainage Strategy' of <b>6.3.10.1 ES Appendix 10.1 Flood Risk Assessment and Drainage Strategy Report [APP-089]</b> assesses that the panelled areas will not alter the existing surface water run-off regime and will therefore not be formally drained. Areas of increased hardstanding such as smaller areas of hardstanding formed as footings for electrical infrastructure will utilise SuDS principles and attempt to mimic the existing surface water run-off regime as existing.</p> <p>The substation and BESS area within the Scheme is considered within an area specific drainage strategy included within Section 3.0 of <b>6.3.10.5 Environmental Statement - Appendix 10.5 FRA DS West Burton 3 [APP-093]</b>.</p> <p>The drainage strategy and detailed drainage design will be developed during the detailed design process. As secured by Requirement 11 in Schedule 2 of the <b>3.1_C Draft Development Consent Order Revision C</b></p>

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
				[EN010132/EX3/WB3.1_C] "No part of the authorised development may commence until written details of the surface water drainage scheme and (if any) foul water drainage system for that part have been submitted to and approved by the relevant planning authority."
			Comments refer to increased flood risk from vegetation removal during construction	The proposed scheme is largely sited on agricultural fields which will be regularly ploughed and de-vegetated. Vegetation removal during the construction stage has not been specifically assessed within our works however, the resulting effects of vegetation removal (Mud and Debris Blockages, Compaction of Soils and Silt-laden Runoff) are all considered with <b>6.2.10 Environmental Statement - Chapter 10 Hydrology Flood Risk and Drainage [APP-048]</b> and will be managed through the <b>7.1_B Outline Construction Environmental Management Plan Revision B [EN010132/EX3/WB7.1_B]</b> , which is secured by Requirement 13 in Schedule 2 of the <b>3.1_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C]</b> .



## 2.10 Landscape and Visual Impact

**Table 2.10: Applicant's Response to Ecology and Biodiversity Themed Issues**

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
LAN-01	REP1-086; REP1-091; REP1-092; REP1-095; REP1-096; REP1-103; REP1A-040; REP1A-041; REP1A-051; REP1A-057; REP1A-059; REP1A-066	Landscape Impact	Comments state that the landscape would be changed, specifically the AGLV.	<p>Landscape and Visual: AGLV [REP1-086]</p> <p>The Applicant notes that the Scheme is not located within, or within the setting of, any nationally designated landscapes.</p> <p><b>6.2.8 ES Chapter 8_Landscape and Visual Impact Assessment [APP-046]</b> (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 8.10.74 to 8.10.79) and has concluded that effects will be Not Significant on landscape character and visual amenity over an extensive area as a result of the cumulative impacts of the schemes.</p>

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
			<p>Comments objecting to removal of hedgerows and trees.</p>	<p>Landscape and Visual: Hedgerows [REP1-086, REP1-092 and REP1-095]</p> <p>The power to remove hedgerows in the draft DCO needs to be read in conjunction with the <b>WB7.3 Outline Landscape and Ecological Management Plan Revision B [EN010132/EX3/WB7.3_B]</b> (the 'OLEMP') which is secured by the Requirement 7 of Schedule 2 of <b>3.1_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C]</b>.</p> <p>1. The LVIA's intention is to retain and enhance trees and hedgerows and the revised OLEMP sets out in paragraph 1.1.5 that wherever feasible, the Scheme utilises existing access points to accommodate internal access between fields, land areas, solar panel areas, substation sites and battery storage areas.</p> <p>2. The extent of tree and hedgerow removal is proportionally set out but in certain locations where existing access points do not exist some minor hedgerow works (pruning and removal) is required, as set out in Appendix C – Hedgerow Removal Plans.</p> <p>3. These minor hedgerow works (pruning and removal) differentiate between the temporary hedgerow removal for construction, such as indicative access and abnormal indivisible load (AIL) locations and the removal that will be in place during the full operational lifetime of the Scheme.</p>

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
LAN-02	REP1-091; REP1-092; REP1-095; REP1-096; REP1-099; REP1-103; REP1A-043; REP1A-045; REP1A-046	Visual Impact	Comments state that the scenic beauty of the area would be destroyed.	<p>'LVIA specific' consultation has been undertaken with Lincolnshire County Council and Nottinghamshire County Council. Please refer to <b>LVIA ES Appendix 8.4 Consultation [APP-075]</b> where 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) will provide sufficient and relevant baseline for the LVIA.</p> <p>The Scheme has been designed to enhance and retain the character and scenic qualities of the landscape, where applicable, including recognition of the existing landscape pattern including features within the Site/s and the 5km Study Area.</p> <p>The landscape mitigation measures 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 <b>LVIA ES Figures 8.18.1-A to 8.18.3-A Landscape and Ecology Mitigation and Enhancement Plans [REP1-026 to REP1-031]</b>.</p> <p>Please also refer to <b>7.3_B Outline Landscape and Ecological Management Plan Revision B</b></p>

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
				[EN010132/EX3/WB7.3_B] which is secured by Requirement 7 in Schedule 2 of <b>3.1_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C]</b> .
			Comments state that the development will be clearly visible from certain viewpoints.	<p><b>6.2.8 ES 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 effects 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 considered as part of the process.</p> <p>The LVIA has taken into account and assessed viewpoints, residential, transport and PRoW receptors with views across the landscape. The extent of the Study Area has been determined with Lincolnshire County Council and Nottinghamshire County Council in accordance with recognised GLVIA3 methodology to encompass all receptors that may experience significant effects.</p>
			Comments state that the development will be visible from Lincoln Cliff.	<p><b>6.2.8 ES Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> (the 'LVIA') takes account of the visibility of the Scheme from public vantage points including vistas from the Lincoln 'Cliff' over to Nottinghamshire and across the Trent Valley. The</p>

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
				<p>LVIA also takes account of intervisibility between the Scheme and Lincoln Castle and Lincoln Cathedral.</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>The approach to the LVIA is undertaken in consideration of comments made at the Scoping, PEIR and Submission Stages of the project and in workshops between the Applicant and the consenting authorities, which included Lincolnshire County Council (LCC) and Nottinghamshire County Council (NCC). At these workshops, the Applicant explained how they will approach the LVIA and LCC and NCC discussed and agreed viewpoints.</p>
			<p>Comments state that views from residential properties would be negatively affected.</p>	<p><b>6.2.8 ES Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> (the 'LVIA') considers the impacts and effects on residential receptors as part of the assessment process. For the purpose of the assessment, 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</p>

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
				detailed analysis of these residential receptors is set out at <b>6.3.8.3 ES Appendix 8.3 Assessment of Potential Visual Effects [APP-074]</b> which shows that there are potential short term Significant effects. This assessment is undertaken in accordance with Landscape Institute guidance on Residential Visual Amenity Assessment (RVAA).
			Comments that views from roads and public rights of way will be negatively affected.	<b>6.2.8 ES Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> (the 'LVIA') considers the impacts and effects on Public Rights of Way (PRoW) and Transport Receptors as part of the assessment process. For the purpose of the assessment, the detailed analysis of these receptors is set out at <b>6.3.8.3 ES Appendix 8.3 Assessment of Potential Visual Effects [APP-074]</b> which shows that there are potential short-term and long-term Significant effects.
			Some comments refer to ineffective, little or no visual mitigation of the Scheme.	<b>6.2.8 ES Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> (the 'LVIA') considers the proposed mitigation and how it will enhance the landscape character and visual amenity of the Study Area and reduce the visibility of the Scheme. The landscape mitigation measures provide new planting, which will include new native hedgerows and tree cover, and this will also include their management and maintenance.  The mitigation measures are shown on <b>LVIA ES Figures 8.18.1-A to 8.18.3-A Landscape and Ecology</b>

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
				<p><b>Mitigation and Enhancement Plans [REP1-026 to REP1-031].</b></p> <p>Please also refer to <b>7.3_B Outline Landscape and Ecological Management Plan Revision B [EN010132/EX3/WB7.3_B]</b> which is secured by Requirement 7 in Schedule 2 of <b>3.1_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C].</b></p>
			Some comments refer to views of historic value in Lincolnshire being lost.	'LVIA specific' consultation has been undertaken with Lincolnshire County Council and Nottinghamshire County Council. Please refer to <b>LVIA ES Appendix 8.4 Consultation [APP-075]</b> where 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) will provide sufficient and relevant baseline for the LVIA.
LAN-03	REP1-086; REP1-091; REP1A-051	Photomontages	Commentators state that the applicant's photomontages are not representative and are inaccurate and misleading.	<p>The Scheme utilised a photography and visualisation team comprised of leading photography and visualisation specialists from across the UK. Co-ordinated by Lanpro and led by Mike Spence of MSE.</p> <p>Mike Spence has over 30 years photography and visualisation experience, working on a wide range of complex infrastructure projects, from major Highways schemes, to Carbon Capture, the power station development, tall buildings and solar projects</p>

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
				<p>across the UK. Crucially, Mike was a key technical author of the Landscape Institute's TGN 06/19 on visualisation of development proposals. He has worked alongside The National Trust, Historic England, English Heritage, RBG Kew, Historic Royal Palaces as well as NatureScot (formerly Scottish Natural Heritage) for whom he is currently working on updates to their windfarm visualisation guidance. The photomontage work undertaken for the project has followed recognised best practice 'Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3) by the Landscape Institute and Institute of Environmental Management &amp; Assessment and the Landscape Institute's guidance 'Visual Representation of Development Proposals Technical Guidance Note 06/19 (TGN 06/19)'.</p> <p>The photomontages produced comprise of a series of overlapping single frame 50mm photographs taken from a surveyed position using GNSS equipment to achieve a locational accuracy down to 1cm in eastings, northings and height. These overlapping images were cylindrically re-projected to ensure consistent geometry was achieved. The camera equipment used and technical methodology followed is set out within <b>6.4.8.1.5 ES Appendix 8.1.5 Photography and Photomontage Methodology [APP-147 to APP-149]</b> in detail. The survey verified photography was then matched with a geo-</p>



Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
				referenced accurate 3D Model built from layout data, OS MasterMap, and Environmental Agency LIDAR DTM (2m) data, with 3D point data used for checking horizontal and vertical alignment. Visualisations are presented as either AVR 0, 1, 2 or 3. The differences between each AVR are explained in the Landscape Institute's TGN 06/19. The resultant visualisations are highly accurate and therefore, the photomontages are considered to fairly demonstrate the correct positioning, scale and massing of the development in its local and wider context.
LAN-04	REP1-086; REP1-091	3D Model	Commentators state that a 3D model of the trees and hedgerows presently in situ should show be shown on the model to make a comparison.	Please refer to the Applicant's response to LAN-01 regarding the removal of hedgerows and trees.
LAN-05	REP1-089; REP1-091; REP1-095; REP1A-057; REP1A-059; REP1A-063	Impact on Long Views	Comments that there would be negative impact on views from various places such as the 'Cliff', Broxholme and B1398.	<b>6.2.8 ES Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> (the 'LVIA') takes account of the visibility of the Scheme from public vantage points including vistas from the Lincoln 'Cliff' over to Nottinghamshire and across the Trent Valley. The LVIA also takes account of intervisibility between the Scheme and Lincoln Castle and Lincoln Cathedral.  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)

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
				<p>There are potential long-distance views to Lincoln Cathedral and Lincoln Castle. Lincoln Cathedral lies approximately 8.1km km to the southeast of West Burton 1, 7.9km from West Burton 2 and 12.8km from West Burton 3. Lincoln Castle lies approximately 8.4km to the southeast of West Burton 1, 8.2km to the southeast of West Burton 2 and 13.1km to the southeast of West Burton 3. With this being the case, 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> <p>The approach to the LVIA is undertaken in consideration of comments made at the Scoping, PEIR and Submission Stages of the project and in workshops between the Applicant and the consenting authorities, which included Lincolnshire County Council (LCC) and Nottinghamshire County Council (NCC). At these workshops, the Applicant explained how they will approach the LVIA and LCC and NCC discussed and agreed viewpoints with the Applicant to be used in the Assessment.</p>

## 2.11 Noise and Vibration

**Table 2.11: Applicant's Response to Noise and Vibration Themed Issues**

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
NOI-01	REP1A-048; REP1A-056	Noise from the Scheme	Comments raise concerns about impact of noise from the Scheme on residential amenity	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.
NOI-02	REP1A-057	Construction noise	Comments raise concerns about impact of noise from the construction of the Scheme	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.

## 2.12 Other Environmental Matters

**Table 2.12: Applicant's Response to Other Environmental Matters Themed Issues**

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
OEM-01	REP1-086; REP1-102; REP1A-044; REP1A-051; REP1A-054; REP1A-056; REP1A-057; REP1A-061; REP1A-065	Fire Risk and Safety	Concern regarding fire risks arising from battery storage and substation.	The Applicant has submitted a revised Outline Battery Storage System Management Plan (OBSSMP) <b>[EN010132/EX3/WB7.9_A]</b> for Deadline 3. The OBSSMP conveys how the indicative site design and BESS system requirements will mitigate all thermal runaway risks (fire and explosion, and toxicity).  The battery Storage Safety Management Plan is secured through Requirement 6 in Schedule 2 to the draft DCO <b>[EN010132/EX3/WB3.1_C]</b> .
OEM-02	REP1-086; REP1A-041; REP1A-061	Fire Safety Measures	Concern regarding measures to be put in place to deal with BESS fire.	The Applicant has submitted a revised Outline Battery Storage System Management Plan (OBSSMP) <b>[EN010132/EX3/WB7.9_A]</b> for Deadline 3. The OBSSMP conveys how the indicative site design and BESS system requirements will mitigate all thermal runaway risks (fire and explosion, and toxicity).
			Concern regarding water availability to cool fires/thermal runaway in the event of flooding.	The Applicant has submitted a revised Outline Battery Storage System Management Plan (OBSSMP) <b>[EN010132/EX3/WB7.9_A]</b> for Deadline 3. The OBSSMP conveys how the indicative site design and BESS system requirements will mitigate all thermal runaway risks. Minimum water supply requirements will follow National Fire Chiefs Council (NFCC)

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
				<p>guidelines. At the detailed design stage Lincolnshire Fire &amp; Rescue (LFR) will be able to view the selected BESS system fire test data and an independent Fire Protection Engineer will validate the final water supply requirements. A BESS design which may require direct LFR firefighting engagement tactics will not be selected for this facility.</p>
OEM-03	REP1-086; REP1A-037; REP1A-043; REP1A-051; REP1A-057	Pollution from BESS	Concerns regarding release of toxins/chemicals into the flood water and wider watercourses.	<p>The Applicant outlines in the OBSSMP <b>[EN010132/EX3/WB7.9_A]</b> that because Site and BESS indicative design principles and the final Emergency Response Plan content will ensure that LFR are expected to employ a defensive strategy i.e., only boundary cooling should be employed for cooling of adjacent BESS or associated supporting equipment. Pollution concerns from this approach are minimal.</p> <p>As set out in <b>6.2.10 Environmental Statement – Chapter 10 Hydrology Flood Risk and Drainage [APP-048 and REP1-073]</b>, where practical, at detailed design stage it is recommended that runoff from the battery 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</p>

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
				<p>storage areas will be closed, isolating the battery storage areas drainage from the wider environment. The water contained by the valves can then be tested and either treated and released or tankered off-site as necessary and in consultation with the relevant consultees at the time.</p> <p>The drainage strategy and detailed drainage design will be developed during the detailed design process. As secured by Requirement 11 in Schedule 2 of the <b>3.1_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C]</b> "No part of the authorised development may commence until written details of the surface water drainage scheme and (if any) foul water drainage system for that part have been submitted to and approved by the relevant planning authority."</p>
			Concerns raised regarding risk to human health from pollution from BESS	<p>The Applicant has revised the <b>Outline Battery Storage Safety Management Plan (OBSSMP) [EN010132/EX3/WB7.9_A]</b> at Deadline 3 which should be read alongside <b>WB8.4.17.1 ES Addendum: Air Quality Impact Assessment of Battery Energy Storage Systems (BESS) Fire [EN010132/EX3/WB8.4.17.1]</b>.</p> <p>The primary toxic gas emission from lithium-ion battery (LIB) chemistries is Hydrogen Fluoride (HF). This is referenced in both the OBSSMP <b>[EN010132/EX3/WB7.9_A]</b> and ES Appendix 17.4</p>

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
				<p>BESS Fire Technical Note <b>[APP-136]</b>. Lithium ferro phosphate (LFP) chemistry was selected as the worst-case example for explosion risk and toxic gas emissions due to the higher level of hydrogen produced by LFP cells compared to other LIB chemistries.</p> <p>Based on the factors of distance to the nearest property and the short-term nature of a fire incident, the assessment concludes that there will not be adverse effects at the closest receptor locations as a result of a BESS thermal runaway incident.</p> <p>Notwithstanding, whilst there is low risk of adverse effects at the closest receptors, the emergency response plan (ERP) produced at the detailed design stage (template outlined in section 5.4.3 <b>[EN010132/EX3/WB7.9_A]</b>) will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider.</p> <p>At the detailed design stage, battery system specific consequence modelling will be provided to demonstrate that respondents will not be exposed to emission levels that exceed levels identified in ES Appendix 17.4 <b>[APP-136]</b>.</p>

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
OEM-04	REP1A-057; REP1A-062	Electromagnetic fields	Comments raise health risks from electromagnetic fields	<p>The Applicant's position regarding EMF is set out in Section 21.2 of <b>6.2.21 Environmental Statement – Chapter 21 Other Environmental Matters [APP-059]</b>. The World Health Organisation have published information and guidance surrounding electromagnetic fields<sup>1</sup> which recognises that “short-term exposure to very high levels of 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.”</p> <p>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>. 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 <b>[APP-059]</b>. No impact to human health from EMF is anticipated in relation to the Scheme. Assessment of the impacts from EMF were scoped out of the Environmental Statement on this</p>

<sup>1</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	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
				basis (see Section 3.12 of <b>6.3.2.2 Environmental Statement – Appendix 2.2 EIA Scoping Opinion [APP-068]</b> ).
			Comments raise issues related to electromagnetic interference	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 (<300Hz). Radio transmissions, telephone transmissions, and Wi-Fi signals are generally between 20kHz and 300GHz and so will not be adversely affected by the Scheme. Further, the propagation of electromagnetic fields attributed to power is likely to be limited to within the Scheme extents and a narrow corridor around the cable route.

## 2.13 Principle of Development

**Table 2.13: Applicant's Response to Principle of Development Themed Issues**

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
PRI-01	REP1-096; REP1-097; REP1-102; REP1-103; REP1A-051	Ethical Sourcing	Comment that the sourcing of manufactured materials for the Scheme raises ethical and moral concerns.	<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 "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."</p> <p>The Skills, Supply Chain and Employment Plan is secured by Requirement 20 of Schedule 2 to the draft Development Consent Order <b>[EN010132/EX3/WB3.1_C]</b>.</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>
PRI-02	REP1-096; REP1-099; REP1-102;	Industrialisation	Comment that solar schemes will result in industrialisation of countryside.	The Applicant respectfully disagrees with the Interested Party's comment and considers the approach taken and subsequent conclusions

	REP1A-046; REP1A-053; REP1A-055; REP1A-057; REP1A-059; REP1A-065; REP1A-066; REP1A-067			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.
PRI-03	REP1A-037; REP1A-043; REP1A-045; REP1A-057; REP1A-067	Environmental Impacts from Production of Infrastructure	Comments raise concerns over environmental impacts from mining/extracting of materials for manufacturing of panels and batteries in China, Congo etc.	<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 [REP1-012]</b> which states that it is anticipated that the PV panels and batteries will be sourced from China or a country of similar distance from the UK. Direct environmental impacts from the sourcing of raw materials in the countries of origin have not been assessed.</p> <p>That notwithstanding, the Applicant has noted and accounted for the sourcing of infrastructure within its assessment of carbon emissions and that the manufacture and transport of products will likely be the largest sources of GHG emissions from the Scheme. 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>

				The detailed Skills, Supply Chain and Employment Plan is secured through Requirement 20 in Schedule 2 of the <b>3.1_C Draft Development Consent Order Revision B [EN010132/EX3/WB3.1_C]</b> .
PRI-04	REP1A-043; REP1A-057	Developer Motive	Comments raise concerns that developer motives are solely orientated by economics	<p>Section 6.2 of <b>7.5_A Planning Statement [EN010132/EX3/WB7.5_A]</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 (estimated 31,425,614 MWh over a 60-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 (2011), paragraph 3.3.20 of NPS EN-1 (November 2023), section 3.4 of NPS EN-1 (2011) 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 (2011), paragraph 2.3.3 of NPS EN-1 (November 2023), the National Infrastructure Strategy 2020</li> </ul>

				<p>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 (2011), Paragraph 2.3.4 of NPS EN-1 (November 2023) 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 NPS EN-1 (November 2023) (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 NPS EN-1 (2023) (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 Environmental Statement [<b>APP-039</b> to <b>APP-061</b>] and have been minimised, where possible, through careful and sensitive design and detailed mitigation strategies.</p>
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## 2.14 Socio-Economics, Tourism and Recreation

**Table 2.14: Applicant's Response to Socio-Economic, Tourism and Recreation Themed Issues**

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
STR-01	REP1-086; REP1-089; REP1-096; REP1-097; REP1-103; REP1A-046; REP1A-047; REP1A-057; REP1A-058; REP1A-066	Agricultural Employment	Some comments refer to loss of agricultural employment.	<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.</p>

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
				<p>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>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_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C]</b>.</p>
			Comments refer to economic impacts on tenant farmers	<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</p>

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
				result of temporary works to lay cables between the Sites and the Grid Connection Point.
			Some comments refer to very few new skilled jobs being created.	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). The Applicant confirms that a Skills, Supply Chain and Employment Plan is secured by Requirement 20 of Schedule 2 to <b>3.1_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C]</b> .
STR-02	REP1-096; REP1-097; REP1-103; REP1A-046; REP1A-051; REP1A-057; REP1A-066	Loss of employment	Some comments refer to net reduction in employment.	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: <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> </ul>



Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
				<ul style="list-style-type: none"> <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 medium-term temporary moderate-minor beneficial effect during decommissioning (18.7.141).</p>
STR-03	REP1-086; REP1-089; REP1-090; REP1-097; REP1A-046; REP1A-051; REP1A-055; REP1A-066	Tourism Impacts	Some comments refer to loss of tourism.	<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 <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>

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
				<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>
			Some comments raise concerns regarding the impact of the Scheme on the attractiveness of Lincoln for visitors.	<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>WB6.2.18 ES 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 significant effect. During operation, the greatest effects to</p>

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
				<p>tourism and recreation receptors are anticipated to be long-term moderate-minor adverse (see para. 18.7.101), which is therefore not significant.</p> <p>Furthermore, Section 18.10 of <b>WB6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [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 18.27).</p>
STR-04	REP1-086; REP1-089; REP1-096; REP1-097; REP1A-041; REP1A-046; REP1A-047; REP1A-048; REP1A-051; REP1A-053; REP1A-057; REP1A-066	Economic Prosperity	<p>Some comments believe that there will be no economic benefit to the communities affected.</p> <p>Some comments refer to no direct economic benefits to the area.</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	WR Ref.	Issue	Summary of Issue Raised	Applicants 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>In addition, the Applicant is committed to providing a Community Benefit Fund – see paragraph 4.8.1 of <b>WB7.5_A Planning Statement [EN010132/EX3/WB7.5_A]</b>. This fund will be available for community-based benefits such as (but not limited to) community-led energy related projects.</p>
			Some comments raise concerns regarding the impact of the Scheme on existing businesses.	Impacts on business have been assessed as a whole across the Local Impact Area in Section 18.7 of <b>WB6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b> .
			Concerns regarding lack of housing and rental accommodation.	Impacts of the construction, operation and decommissioning of the Scheme on accommodation stock have been assessed in <b>WB6.2.18 ES Chapter 18</b>

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
				<p><b>Socio Economics Tourism and Recreation [APP-056].</b></p> <p>This is assessed to be medium-term major-moderate beneficial effect (paragraph 18.7.34), minor beneficial effect during operation (paragraph 18.7.88), and medium term temporary negligible adverse affect during decommissioning (paragraph 18.7.126).</p> <p>The sector is likely to return to near baseline conditions following the conclusion of the Scheme's decommissioning. As such, the Local Impact Area will experience a permanent minor beneficial effect following completion of decommissioning. This effect will be a permanent negligible beneficial effect in the Regional Impact Area.</p>
			Some comments refer to reduction in house prices.	<p>Impacts on property and land values are not directly assessed. Consideration of the impact of the construction, operation and decommissioning of the Scheme on accommodation stock in <b>WB6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b> identifies beneficial significant impacts to accommodation stock (housing). There is no strong evidence to show solar farms negatively affect nearby property value, and it is more likely that other factors are more significant to changes in property value.</p>

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
STR-05	REP1-086; REP1-095; REP1-097; REP1-102; REP1A-037; REP1A-042; REP1A-043; REP1A-045; REP1A-047; REP1A-051; REP1A-053; REP1A-056; REP1A-057; REP1A-064; REP1A-065; REP1A-067	Health and Wellbeing	Impact on general health and wellbeing, and quality of life of residents.	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> .
STR-06	REP1-095; REP1-097; REP1-102; REP1A-037; REP1A-056	Public rights of Way	Concern that PRowS will may not remain.	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_B Environmental Statement - Appendix 14.3 Outline Public Rights of Way Management Plan Revision B [EN0101032/EX3/WB6.3.14.3_B]</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.

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
				<p>A Public Rights of Way Management Plan that is substantially in accordance with the outline PRoWMP <b>[REP1-018]</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_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C]</b>.</p>

## 2.15 Soils and Agriculture

**Table 2.15: Applicant's Response to Soils and Agriculture Themed Issues**

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
SOI-01	REP1-086; REP1-089; REP1-090; REP1-092; REP1-094; REP1-096; REP1-097; REP1-098; REP1-099; REP1-102; REP1-103; REP1A-037; REP1A-040; REP1A-041; REP1A-043; REP1A-044; REP1A-046; REP1A-047; REP1A-048; REP1A-049; REP1A-050; REP1A-051; REP1A-053; REP1A-055;	Use of agricultural land	Concerns raised around loss of arable and agricultural land.  Comments refer to loss of food production in Lincolnshire.	A large proportion of the agricultural land within the Site 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> .  Decommissioning of the solar farm is secured through Requirement 21 of Schedule 2 to the <b>3.1_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C]</b> . Agricultural land is therefore not lost as a result of the Scheme.



Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
	REP1A-056; REP1A-057; REP1A-065; REP1A-066; REP1A-067			
SOI-02	REP1-089; REP1-090; REP1-092; REP1-096; REP1-098; REP1-103; REP1A-041; REP1A-042; REP1A-043; REP1A-045; REP1A-046; REP1A-049; REP1A-051; REP1A-054; REP1A-055; REP1A-056; REP1A-057; REP1A-058; REP1A-063; REP1A-065;	Food Security	Comments refer to loss of agricultural land impacting food security.	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 UK7 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. 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.
			Comments refer to the conflict in Ukraine exacerbating food security issues.  Comments refer to reliance on food imports.	The United Kingdom Food Security Report 2021 published by Defra notes that UK self sufficiency trends for food production have been stable for over two decades. Climate Change and Soil Degradation are noted as two key threats to UK food security. Land use change is not. The Applicant's position is that the proposed Scheme is not a threat to UK food security.

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
	REP1A-066; REP1A-067; AS-014		Comments refer to concerns relating to loss of arable land as a result of sea level rise	The United Kingdom Food Security Report 2021 published by Defra notes that UK self sufficiency trends for food production have been stable for over two decades. Climate Change and Soil Degradation are noted as two key threats to UK food security. Land use change is not. Any loss of arable land to rising sea level would be as a result of climate change, that this Scheme seeks to address by reducing carbon emissions through the production of renewable energy.
			Comments state that crop harvesting yields/productivity should be measured instead of ALC to determine quality of land	High clay content limits opportunities for arable land work and/or carrying livestock following rainfall. This is the basis of the ALC soil wetness and workability limitation detailed in <b>6.2.19 Environmental Statement - Chapter 19 Soils and Agriculture [APP-057]</b> .
SOI-03	REP1-098; REP1-102; REP1A-046; REP1A-049; REP1A-056; REP1A-066; REP1A-067	Restoration of land	Comments state that they do not believe that the land can be restored to its original state.	Defra R&D project LE0206 demonstrates that open cast and landfill sites are routinely restored to agricultural land without loss of ALC Grade. We can therefore have confidence that there will be no loss of ALC Grade from the insertion and subsequent drawing out of narrow steel piles.

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
SOI-04	REP1-086; REP1-096	ALC Survey	Some comments state that soil grading should have been conducted for West Burton 4 at an early stage.	The ALC baseline survey work presented in <b>ES Appendix 19.1 Agricultural Land Quality, Soil Resources and Farming Circumstances Report [APP-137]</b> includes the area titled West Burton 4. Detailed ALC Survey of this area found agricultural land that was entirely best and most versatile. The Applicant subsequently excluded West Burton 4 from the Sites in order to minimise the extent of BMV land included within the Scheme.
			Comment states that ALC surveys should be retested	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 (paragraph 2.1.5 <b>[APP-137]</b> ) and the MAFF ALC Guidelines (paragraph 2.1.2 <b>[APP-137]</b> ). Natural England retain ALC experts who will appraise the evidence presented by the Applicant. No rationale or evidence for the lack of confidence in the ALC assessment has been presented.  Natural England Deadline 1A Submission [REP1A-008] states "Natural England are satisfied that the detailed ALC survey undertaken across the order limits is appropriate."

## 2.16 Transport and Access

**Table 2.16: Applicant's Response to Transport and Access Themed Issues**

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
TRA-01	REP1-096; REP1-103; REP1A-044; REP1A-045; REP1A-046; REP1A-056; REP1A-057; REP1A-066; REP1A-067	Local Highway Network	<p>Comments refer to use of single track lanes which are in poor condition.</p> <p>Comments refer to general inadequacy of local road network for construction traffic</p>	<p>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_B Environmental Statement - Appendix 14.2 Construction Traffic Management Plan Revision B [EN010132/EX3/WB6.3.14.2_B]</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>REP1-016</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> </ul>

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
				<ul style="list-style-type: none"> <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</li> <li>• A commitment to rectify any defects to the local highway network caused by HGV movement CTMP Chapter 6 point xxiv)</li> </ul> <p>The CTMP [REP1-016] is secured by Requirement 15 of Schedule 2 to <b>3.1_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C]</b>.</p>
TRA-02	REP1-096; REP1-102; REP1-103; REP1A-046; REP1A-047; REP1A-049; REP1A-066	Highway Safety Impacts	Concerns regarding safety risks from construction traffic on pedestrian, cyclists, horses, wildlife and other traffic.	<p>An assessment of the effects of the Scheme on Accidents and Safety are set out in <b>WB6.2.14 ES Chapter 14 Transport and Access [APP-052]</b>. Table 14.24 provides a summary of the effects during construction, when traffic associated with the Scheme will be at its highest, after mitigation is taken into account. This shows negligible or minor impacts on pedestrian amenity. This is not considered to be a significant effect.</p> <p>An Outline Construction Traffic Management Plan (CTMP) has been prepared to support the application within <b>6.3.14.2_B Environmental Statement - Appendix 14.2 Construction Traffic Management</b></p>

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
				<p><b>Plan Revision B [EN010132/EX3/WB6.3.14.2_B]</b> which is secured through Requirement 15 in Schedule 2 of the <b>3.1_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C]</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 [REP1-014]</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>
			Concerns that quiet country lanes will be made unsafe.	<p>An assessment of the effects of the Scheme on Accidents and Safety are set out in <b>6.2.14 Environmental Statement - Chapter 14 Transport and Access [APP-052]</b>. Table 14.23 provides a summary of the effects during construction, when traffic associated with the Scheme will be at its highest, after mitigation is taken into account. This shows negligible impacts on the risk of accidents for all roads. This is not considered to be a significant effect.</p>

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
			Concerns that installed equipment will impact the safety of road users.	<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])). 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 [REP1-026 to REP1-031]</b> ).
TRA-03	REP1A-033; REP1A-037; REP1A-043; REP1A-045; REP1A-047; REP1A-051; REP1A-057; REP1A-067	Highway disruption	Comments refer to disruption and inconvenience to local communities as a result of construction and cable installation traffic	Section 6 of <b>6.3.14.1_A Environmental Statement - Appendix 14.1 Transport Assessment Revision A [REP1-014]</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 take place between 09:30-16:30, avoiding overnight, early morning and evening periods.  An Outline Construction Traffic Management Plan (CTMP) has been prepared to support the application

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
				within <b>6.3.14.2_B Environmental Statement - Appendix 14.2 Construction Traffic Management Plan Revision B [EN010132/EX3/WB6.3.14.2_B]</b> which is secured through Requirement 15 in Schedule 2 of the <b>3.1_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C]</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.
TRA-04	REP1A-039	Damage to household	Comment specifically raises concern with structural damage from Abnormal Indivisible Load (AIL) transportation	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 [REP1-014]</b> , and Section 6 of <b>6.3.14.2_B Environmental Statement - Appendix 14.2 Construction Traffic Management Plan Revision B [EN010132/EX3/WB6.3.14.2_B]</b> Abnormal load specialists 'Wynns' developed the abnormal load movement strategy. 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 <b>[REP1-016]</b> .



Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
				<p>A number of measures are set out in the CTMP <b>[REP1-016]</b> to minimise the effect of HGVs and AILs on the local highway network. These include:</p> <ul style="list-style-type: none"> <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</li> <li>• A commitment to rectify any defects to the local highway network caused by HGV movement CTMP Chapter 6 point xxiv)</li> </ul> <p>The CTMP <b>[REP1-016]</b> is secured by Requirement 15 of Schedule 2 to <b>3.1_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C]</b>.</p>

## 2.17 Waste

**Table 2.17: Applicant's Response to Waste Themed Issues**

Reference	WR Ref.	Issue	Summary of Issue Raised	Applicants Response
WAS-01	REP1-096; REP1-103; REP1A-046; REP1A-047; REP1A-057; REP1A-066; REP1A-067	Recycling of infrastructure	Query as to how the infrastructure will be recycled.	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> .