West Burton Solar Project

Applicant's Response to Local Impacts Reports

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SOLAR PROJECT

Contents

Issue Sheet

Report Prepared for: West Burton Solar Project Ltd.

Applicant's Response to Local Impact Reports

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1 Introduction

1.1 Purpose of this Document

1.1.1 This document provides West Burton Solar Project Limited (the 'Applicant's) response to the Local Impact Reports ('LIRs') relating to the Development Consent Order Application (the 'Application') for West Burton Solar Project ('the Scheme').

1.1.2 The LIRs were submitted to the Planning Inspectorate at Deadline 1a (07 December 2023) from the following local authorities:

- West Lindsey District Council (WLDC) [REP1A-006]
- Nottinghamshire County Council (NCC) [REP1A-003]
- Lincolnshire County Council (LCC) [REP1A-002]

1.1.3 The LIRs were published on 12 December 2023 to the Planning Inspectorate's website (PINS Reference: EN010132).

1.1.4 Local authorities have worked proactively with the Applicant during the preparation of the Application and since its submission and the Applicant thanks officers for their time.

1.1.5 Table 2.1 below sets out comments made by the above Local Authorities in their LIRs and the Applicant's responses to them.

1.1.6 Where applicable, paragraph or page numbers are provided to assist cross referencing to the relevant LIR.

1.1.7 References to the Application and examination documentation, as submitted to the Planning Inspectorate on 21 March 2023, are provided in accordance with the referencing system as set out in the Planning Inspectorate's 'West Burton Solar Farm Examination Library'.

1.1.8 Revision suffixes have also been attached to documents which, since submission, have been revised for and resubmitted by Deadline 1 to the Planning Inspectorate.

2 Applicants Response to Local Impact Reports

Table 2.1: Applicants Response to Local Impact Reports

LIR Ref.	Summary	Applicant's Response
2.1 Air Quality		
WLDC 19.1	WLDC raise the following points arising from the review of the Air Quality chapter of the ES: *"The main risk to air quality will arise during construction of the Scheme on its own. The impact will the multiplied on a cumulative level in the event the other solar schemes were granted development consent."*	Assessment of the potential risks and the appropriate mitigation measures are presented within the Dust Management Plans **[APP-133 to APP-135]**. Following the implementation of the appropriate mitigation measures, the impact on air quality will be non-significant, For further information regarding how these mitigation measures are secured, please see the response to the Examining Authority's First Written Question 1.10.17 in the Applicant's Response to the First Written Questions **[EX3/WB8.1.21]**.
WLDC 19.7 WLDC 19.8 WLDC 19.12 WLDC 19.13	WLDC has identified no positive and no neutral impacts during construction, operation and decommissioning.	The Applicant notes this comment. The dust assessment and mitigation measures have been undertaken and presented to ensure that any potential negative impacts are minimised. For further information regarding how these mitigation measures are secured, please see the response to the Examining Authority's First Written Question 1.10.17 in the Applicant's Response to the First Written Questions **[EX3/WB8.1.21]**.
WLDC 19.9 to 19.11	WLDC has identified the following negative impacts during construction, and decommissioning: 1. *"Potential impacts during construction and decommissioning include dust and particulate matter emissions from site activities, such as demolitions,*	The Applicant notes WLDC's conclusion that the effects would not be significant. Assessment of the potential effects and the identified appropriate mitigation measures are presented within the Dust Management Plans **[APP-133 to APP-135]** for each of the specific sites. For further information regarding how these mitigation measures are secured, please see the

LIR Ref.	Summary	Applicant's Response
	earthworks (particularly during dry months), construction, vehicle movements, or from construction materials. 2. *The main potential effects of particulates/dust are:* • *Visual – dust plume, reduced visibility, coating and soiling of surfaces leading to annoyance, loss of amenity, the need to clean surfaces;* • *Physical and/or chemical contamination and corrosion of artefacts;* • *Coating of vegetation and soil contamination; and,* • *Health impacts due to inhalation, e.g. asthma or irritation of the eyes.* 3. *All dust effects are considered to be direct, temporary, short-term and reversible in nature. Following the implementation of site-specific mitigation measures, included within the Outline CEMP, the significance of the effects from dust and emissions is considered to be negligible and not significant in EIA terms."*	response to the Examining Authority's First Written Question 1.10.17 in the Applicant's Response to the First Written Questions **[EX3/WB8.1.21]**.
WLDC 19.14	WLDC has identified the following negative impacts during operation: *"There is a potential fire risk associated with certain types of batteries such as lithium ion, which could result in smoke being blown downwind to nearby human and ecological receptors. Whilst there is low risk of adverse effects at the closest*	The assessments undertaken to inform the Air Quality ES Chapter **[APP-055]** conclude that the impacts during operation will be negligible and not significant. The Applicant has revised the Outline Battery Storage Safety Management Plan (OBSSMP) **[EN010132/EX3/WB7.9_A]** submitted at Deadline 3 which should be read alongside ES Appendix 17.4 BESS Fire Technical Note and ES

LIR Ref.	Summary	Applicant's Response
	receptors, in the case of a fire at the proposed development, good practice safety measures will be implemented. Following the implementation of these measures during an occurrence of fire incident, the effects are determined to be negligible which is not significant in EIA terms."	Addendum: Air Quality Impact Assessment of BESS Fire **[APP-136 and EN010132/EX3/WB8.4.17.1]**. The fire impact assessment of BESS has been revised (1) following the UKHSA approved fire modelling assessment approaches and methodologies and (2) based on the latest LFP BESS fire test data and information (made available in October 2023) and the assessment report titled "'Air quality impact assessment of battery energy storage systems (BESS) fire'", dated 8th on 8 December 2023, submitted at Deadline 3 – report reference of "**ES Addendum: Air Quality Impact Assessment of Battery Energy Storage Systems (BESS) Fire**" **[EN010132/EX3/WB8.4.17.1]**. The BESS fire assessment methodologies, including pollutants considered, and the air quality standards and guidelines for the protection of human health, workers and first responders utilised in the assessment, are the same ones used for the Cottam Solar Project [EN010133] that have been approved by the UKHSA. The short-term predicted environmental concentrations of Nitrogen Dioxide (NO_2) and Carbon Monoxide (CO) at the residential receptor locations from a BESS fire incident are all below the relevant air quality objectives for the protection of human health. All receptors will have a 'low' air pollution level on the DAQI based on the short-term NO_2 pollution index. The predicted ground level 8-Hour mean and 15-min mean of Hydrogen Fluoride (HF) concentrations at the residential receptor locations are all below the relevant British occupational exposure limits. The short-term HF impact of a BESS fire at the receptors is sufficiently 'small'. As such, The effect of a BESS fire on the receptors is insignificant.

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		The predicted maximum short-term HF concentrations are below the AEGL-1 (Acute Exposure Guideline Level 1). In addition, the sensitivity study assessment results of HF impact under a windy condition demonstrate that the predicted HF concentrations are all below the AEGL-1 (Acute Exposure Guideline Level 1) with the exception of the HF concentrations being above the AEGL-1 at 2 metres above ground level and close to fire, for example, 5 metres away from the fire location. The primary toxic gas emission from lithium-ion battery (LIB) chemistries is Hydrogen Fluoride (HF). This is referenced in both the OBSSMP **[EN010132/EX3/WB7.9_A]** and ES Appendix 17.4 BESS Fire Technical Note **[APP-136]**. 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. Based on the factors of distance to the nearest property and the predicted 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. Notwithstanding, whilst there is low risk of adverse effects at the closest receptors, the emergency response plan (ERP) produced at the detailed design stage (the template for which is outlined in section 5.4.3 of the OBSSMP **[EN010132/EX3/WB7.9_A]**) will incorporate all necessary emergency response procedures and actions based upon thermal runaway test data supplied by the BESS system provider.

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		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 **[APP-136]**.
WLDC 19.15	WLDC identify the following cumulative impacts: *"Following the implementation of the site-appropriate mitigation measures identified during construction, operational and decommissioning phases and during an occurrence of fire incident, the residual effects on both human receptors and ecological receptors are determined to be negligible."*	The Applicant's position aligns with WLDC's comments.
2.2 Alternative and Design Evolution		
WLDC 6.1	WLDC identify the following regarding site selection, alternatives and design: 1. The Applicant has stated that 'it would be highly unlikely that a single site of this size would be available within sufficient proximity to the West Burton Point of Connection (POC)'. However, the Gate Burton scheme, which will utilise the Cottam POC, does propose a single contiguous site. Similarly the proposed Tillbridge application also proposes a large single contiguous scheme. This would demonstrate that identifying single sites for large scale solar projects of this kind is achievable, and such sites are likely to be available. 2. The Scheme's study area of 15km is almost double the size of the Gate Burton study area (8km).	1. In paragraph 2.1.10 of the **ES Appendix 5.1 Site Selection Assessment [AS-004]**, the Applicant acknowledges the difficulties in finding a single site of approximately 900ha and, having undertaken its site selection process which prioritised the use of non-BMV land as detailed within the Site Selection Assessment **[AS-004]**, did not find a single suitable site of this size. The Gate Burton and Tillbridge Schemes use a different POC and is therefore not directly comparable with the West Burton Scheme. 2. The Gate Burton applicant was able to find a site with willing landowners within 8km of the Point of Connection (POC). Paragraph 2.1.12 of the Site Selection Assessment **[AS-004]** explains that an initial search area was identified at a 5km radius from the POC, however this was later expanded with the clear preference of identifying land as close to the POC as possible, the search area was enlarged incrementally until suitable options were found within a 15km radius which is considered by the Applicant to be a viable cable

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	3. There is a lack of focus on the cumulative transport impacts during the construction phase within the grid corridor. 4. With regards to the Scheme's land use, the total Order Limits for the West Burton scheme is 886.42 hectares (ha) including cable connection; however, it is 769.08ha including means of access but excluding Cable Route Corridors. This is broken down per site below: • West Burton 1 area: 91.32ha, of which the developable area is 73.51ha. • West Burton 2 area: 306.98ha, of which the developable area is 149.62ha. • West Burton 3 area: 370.78ha, of which the developable area is 284.31ha. • The combined developable area (containing solar panels, substation, the energy storage, and associated infrastructure) is 507.44ha. 5. The combined area (which contains solar panels, substation, the energy storage, and associated infrastructure above) does not include the non-developable area for each site within the scheme which is assumed to include ecological and landscape mitigation. It should be noted that the Gate Burton solar scheme does include this mitigation area in their overall figures. WLDC believe	connection distance for a solar project of this scale. The Applicant considers that the chosen sites are located close enough to the POC to provide a viable scheme. The land required for the Scheme has been demonstrated within the **Site Selection Assessment [AS-004]** to perform better than 3 of the assessed Potential Development Areas (PDAs) and equal to the remaining one following the site selection process. Consequently, there are no obviously more suitable locations for the Scheme within the Search Area. 3. At the site selection stage, which was undertaken early in the Scheme's evolution, specific details of other cumulative sites and their grid connection corridors were not known and could therefore not be considered in detail. As proposals have evolved, the Gate Burton, Tillbridge, West Burton and Cottam developers have worked together to minimise construction impacts within the shared grid connection corridor as detailed within **WB8.1.9_B Joint Report on Interrelationships between Nationally Significant Infrastructure Projects Revision B [REP2-010]**. **6.2.14 ES Chapter 14: Transport and Access [APP-052]** and **8.4.14.1 ES Addendum Chapter 14: Transport and Access [REP1-074]** conclude that there are not expected to be any significant effects in relation to Transport and Access as a result of the construction of the Scheme. Construction traffic impacts will be managed through the **Construction Traffic Management Plan [EN010132/EX3/WB6.3.14.2_B]** which is secured through requirement 15 of the DCO **[EN010132/EX3/WB3.2_C]**. The **Construction Traffic Management Plan [EN010132/EX3/WB6.3.14.2_B]** sets out that there is the potential for a joint CTMP post-consent once further details in relation to Gate Burton and Cottam are known.

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	that the inclusion of the mitigation area is vital for the scheme in order for it to be deemed acceptable and permissible, without the mitigation the impacts of the scheme would be wholly unacceptable. 6. The Gate Burton solar scheme has an agreed installed capacity of 531MW with National Grid at the Cottam Point of Connection (PoC) and its Solar and Energy Storage Park covers an area of 652 ha. This means the Gate Burton solar scheme has a ratio of approximately 1.3ha/MW (approx. 0.81MW/ha) when not including the Grid Connection corridor. If the ratio for Cottam includes the entire "network of sites" then the ratio would be 1.6ha/MW (approx. 0.62MW/ha). This would mean the West Burton Solar Scheme would be ~76% the efficiency of Gate Burton in terms of land use. These ratios are based on the schemes without the inclusion of the cable connection. If the cable connection was included, as it set out in paragraph 3.10.6, the NPS EN-3 (2023), this would mean that the schemes would have a more inefficient use of land. The ratios when including the cable connection are set out below: • Gate Burton: 531MW/824ha = 0.64MW/ha • West Burton: 480MW/886.42 = 0.54MW/ha 7. The Applicant consistently uses phrases such as 'network of sites' and does not follow a contiguous	4. The Applicant notes this comment. 5. The developable area of 507.44ha is defined by the area designated for Work No.1 in **2.3_B Works Plans Revision B [REP1-004]** and numerated in Table 2.1 in **7.13_B Concept Design Parameters and Principles - Revision B [EN010132/EX3/WB7.13_B]**. This therefore excludes areas unsuitable for built development or only suitable for means of access, and landscape and ecological mitigation. The total site area of 769ha (including both developable and non-developable areas) has been used by the Applicant to describe the area of the sites for the consideration of alternatives and design evolution. The Applicant therefore respectfully disagrees with WLDC's statement that mitigation areas associated with the Scheme have been excluded. 6. The Applicant has responded previously on this matter in **8.1.2 The Applicants Responses to Relevant Representations [REP1-050]** under response ALT-02, PRI-15 and SOI-01 and **The Applicant's Response to the First Written Questions [EN010132/EX3/WB8.1.21]** under response 1.1.16. 7. The Applicant respectfully disagrees that the division of the site into three distinct units, i.e. West Burton 1, 2 and 3 demonstrates a lack of good design. Please see Section 6.4 of the **7.5 Planning Statement [EN010132/EX3/WB7.5_A]** which shows that the Scheme has been subject to a detailed and sensitive iterative design process. This has taken account of the context and features of the land within the Order limits, nearby sensitive receptors and assets, information emerging from environmental surveys, feedback from stakeholders, and opportunities and constraints in order to develop a good design

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	design approach. The division of the Scheme into three distinct units, i.e. West Burton 1, 2 and 3, demonstrates the lack of good design. This is particularly evident when drawing comparisons to other large scale solar projects within West Lindsey (Gate Burton, Tillbridge and One Earth are examples) where a contiguous scheme has been designed and is proposed.	that balances the need to maximise the energy generation capacity of the Scheme, with the avoidance and mitigation of impacts, and provision of environmental and other enhancements, where practicable. **6.2.5 ES Chapter 5: Alternatives and Design Evolution [APP-044]** and the **Design and Access Statement [APP-314 and APP-315]** detail how the Sites were refined following detailed ALC assessment. The Design and Access Statement **[APP-314 and 315]** sets out design objectives for the Scheme and paragraph 4.3.1 sets how each of the Scheme's design objectives are addressed through the proposed design measures, and how these measures are secured in the DCO application. In addition, the **7.13_B Concept Design Parameters [EN010132/EX3/WB7.13_B]** sets out the design parameters and principles that apply across the sites.
WLDC 6.74 WLDC 6.75	*"Positive: The Scheme sough[t] to exclude BMV land from the Scheme so far as is practicable.* *Neutral: None".*	The Applicant's position aligns with WLDC's comments.
WLDC 6.76	*"The design of the Scheme does not seek to create a contiguous site and treats the 'individual sites' as 'part of a network'. This suggests that the Scheme is a considered a series of separate solar farms that connect together in order to connect to the West Burton POC."*	The Applicant does not consider that it is necessary to create a single contiguous site in order to provide a well-designed scheme that minimises environmental impacts. Section 6.4 of the **7.5 Planning Statement [EN010132/ EX3/WB7.5_A]** shows that the Scheme has been subject to a detailed and sensitive iterative design process. This has taken account of the context and features of the land within the Order limits, nearby sensitive receptors and assets, information emerging from environmental surveys, feedback from stakeholders, and opportunities and constraints in order to develop a good design that balances the need to maximise the energy generation capacity of the Scheme, with the avoidance and mitigation of impacts, and provision of environmental and other enhancements, where

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		practicable. **ES Chapter 5: Alternatives and Design Evolution [APP-043]** and the **7.6 Design and Access Statement [APP-314 and APP-315]** detail how the Sites were refined following detailed ALC assessment. The **7.6 Design and Access Statement [APP-314 and APP-315]** sets out design objectives for the Scheme and Table 4.1 sets how each of the Scheme's design objectives are addressed through the proposed design measures, and how these measures are secured in the DCO application. In addition, the **7.13_B Concept Design Parameters [EN010133/EX3/WB7.13_B]** sets out the design parameters and principles that apply across the sites.
WLDC 6.77	*"A search area of 15km is considered significant. This is particularly large when considering the Gate Burton search area was only 8km and was considered the maximum viable distance for a new solar farm. This is because the further a solar farm is from the point of connection, the less efficient transmission to the grid becomes and the connection becomes significantly more costly."*	Please refer to the Applicants response to comment WLDC 6.1.
WLDC 6.78	*"The assessment does not consider construction access point via two-way highways to minimise ecological and traffic impacts."*	The **6.3.5.1_A ES Appendix 5.1 Site Selection Assessment Revision A [AS-004]** was undertaken at an early stage of Scheme development. Paragraph 2.1.4 of the NPS EN-1 4.4.3 states *"the consideration of alternatives in order to comply with policy requirements should be carried out in a proportionate manner."* The assessment is therefore high level and primarily desk based. This approach is considered reasonable and proportionate and complies with the aforementioned policy. Construction access points were considered in detail through the evolution of the Scheme design as set out in Tables 5.5 and 5.10 of **ES Chapter 5: Alternatives and Design Evolution [APP-044]**, and construction access has been assessed in **ES Chapter 14: Transport and Access [APP-052] and ES Addendum Chapter 14: Transport and Access**

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		[REP1-074] and no significant transport and access effects have been identified.
WLDC 6.79	*"The project has failed to avoid all BMV agricultural land. The lifespan of the project (40 years) is such that the impact will have the effect of being permanent. No evidence or basis upon which to proclaim that the land would be improved, or able to be used for agriculture post-decommissioning."*	Only 26.24% of the land within the Sites is classified as BMV land (See Table 19.10 of **ES Chapter 19 Soils and Agriculture [APP-068]**). Arable use of the land is temporarily curtailed for the proposed 60 year duration of the solar farm development, and following the end of the operational lifetime for the Scheme, there is a requirement that it must be decommissioned. Specifically, Requirement 21 of Schedule 2 to the draft DCO submitted at Deadline 3 **[EN010132/EX3/WB3.1_C]** requires the Scheme to be decommissioned after 60 years. Paragraph 3.1.3 of the **Outline Soil Management Plan [EN010132/EX3/WB6.3.19.2_A]** makes it clear that adoption of the principles contained within the outline Soil Management Plan will conserve the soil resource, both in terms of volume and its functional capacity for the support of agricultural production. As a result, there is not anticipated to be any degradation of the baseline ALC grade following decommissioning work.
WLDC 6.80	*"The use of construction access points from single lane minor roads despite also proposing two from two-way highways. The justification for the inclusion of these access points is not provided."*	Information on access points is set out in Section 4 of the 6.3.14.1 ES Appendix 14.1 Transport Assessment **[APP-126]** and Section 3 of the 6.3.14.2 ES Appendix 14.2 Construction Traffic Management Plan **[EN010133/EX3/C6.3.14.2_B].** The most appropriate access point to each parcel of land has been identified, utilising existing field accesses where possible. Management of construction vehicle movement at the access points is set out in Section 3 and Section 7 of the 6.3.14.2 ES Appendix 14.2 Construction Traffic Management Plan **[EN010133/EX3/C6.3.14.2_B].**
WLDC 6.81	*"Lack of detailed consideration of cumulative transport impacts during the construction phase within the grid corridor. A commitment to work collaboratively is expressed, however it*	Please refer to the Applicants response to comment WLDC 6.1.

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	appears that limited consideration was given to the potential impact (5-7 years in sequence or 2-3 years concurrently) at the site selection stage."	
2.3 Climate Change		
WLDC 13.1	WLDC raise the following points arising from the review of the Climate Change chapter of the ES: 1. *"ES states beneficial is significant given the reduction in Green House Gas (GHG) Emissions.* 2. *The ES states no residual effects during construction, but the ES does demonstrate that there is a significant amount of embodied carbon in all phases of the scheme, i.e. construction, operation and decommissioning. This must be given weight in the decision making process.* 3. *It is not clear as to whether the loss of crops used for the production of renewable energy been taken into account.* 4. *The Scheme is not compliant with Policy S14: Renewable Energy of the Central Lincolnshire Local Plan as it does not meet all three tests set out in the policy. Specifically, the impacts are not acceptable when considering the scale, siting and design of the Scheme. Gate Burton demonstrates more efficient use of land, is more contained and follows a largely contiguous design. The ES states that the Scheme will*	1. The Applicant's position aligns with WLDC's comments. 2. The Applicant's position aligns with WLDC's comments. 3. The assessment of GHGs has not considered the effect of any renewable energy generation from the loss of crops. This is considered to be a negligible amount of renewable energy generation and is not considered to change the overall conclusions. 4. The Applicant respectfully disagrees and considers that the Scheme fully accords with Policy S14 of the Central Lincolnshire Local Plan for the following reasons: i) The Applicant does not consider that it is necessary to create a single contiguous site in order to provide a well-designed scheme that minimises environmental impacts. Section 6.4 of **7.5 Planning Statement [EN010132/ EX3/WB7.5_A]** shows that the Scheme has been subject to a detailed and sensitive iterative design process. This has taken account of the context and features of the land within the Order limits, nearby sensitive receptors and assets, information emerging from environmental surveys, feedback from stakeholders, and opportunities and constraints in order to develop a good design that balances the need to maximise the energy generation capacity of the Scheme, with the avoidance and mitigation of impacts, and provision of

LIR Ref.	Summary	Applicant's Response
	result in beneficial impacts to landscape character. In line with the first test in Policy S14, this cannot be considered acceptable as the Scheme will have significant impacts on the landscape and the wider community for at least 40 years. The scheme will result in clear and demonstrable significant harm arising from the design of the Scheme. WLDC strongly refutes the conclusions reached in the ES that the construction of this extensive solar farm project will lead to an 'improvement' in local or regional landscape character. This conclusion is considered erroneous, failing to reflect the conclusions reached in other ESs for similar projects and, logically, the introduction of significant industrial elements (panels, substations and related infrastructure, security fencing/lighting etc)."	environmental and other enhancements, where practicable. **6.2.5 ES Chapter 5: Alternatives and Design Evolution [APP-043]** and the **7.6 Design and Access Statement [APP-314 and APP-315]** detail how the Sites were refined following detailed ALC assessment. The Design and Access Statement **[APP-314 and APP-315]** sets out design objectives for the Scheme and Table 4.1 sets how each of the Scheme's design objectives are addressed through the proposed design measures, and how these measures are secured in the DCO application. In addition, the **7.13_B Concept Design Parameters [EN010133/EX3/WB7.13_B]** sets out the design parameters and principles that apply across the sites. ii) The effects of scale and visual impact of the Scheme have been taken into consideration in the assessment of both the landscape and visual effects, which is set out within the **6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact Assessment [APP-046]** (the 'LVIA'). The detailed assessment information can be found within the individual receptor sheets at **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]**. The iterative design process has taken account of the individual elements of the Scheme such as the panels, fencing, battery storage, substations and access arrangements to ensure the best possible fit with the landscape. The photography and photomontage information at **6.4.8.13.1 to 6.4.8.13.71 Environmental Statement - Figure 8.13.1 to 8.13.71 [APP-194**

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		to APP-264] show how the fencing is integrated. For example, **6.4.8.13.26 Environmental Statement - Figure 8.13.26 Viewpoint 26 Photography and Photomontage [APP-219]** shows the fencing and panels set back from the highway and also from the existing and proposed hedgerows to allow for the proposed thickening and growth of new hedgerows. The photomontages also show how the planting mitigation has been designed to enhance the landscape character of this location with new native tree and shrub planting, improvements to existing hedgerows and new hedgerows. The LVIA also sets out landscape mitigation measures that have been designed to avoid and reduce the likely adverse significant effects anticipated from the Scheme. These mitigation measures are set out in **7.3_B Outline Landscape and Ecological Management Plan [EN010132/EX3/WB7.3_B]** and will be secured through Requirement 7 in Schedule 2 of **3.1_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C]**.
WLDC 13.16 WLDC 13.17	WLDC has identified no positive and no neutral impacts during construction.	The Applicant's position aligns with WLDC's comments.
WLDC 13.18 to 13.19	WLDC identify the following negative impacts during construction: 1. *"During the construction stage, the greatest impact of GHGs is the result of embodied carbon in the materials used for construction. Of these, the manufacture and supply of PV panels and batteries will be the largest*	The Applicant's position aligns with WLDC's comments. It is however noted that Chapter 7: Climate Change of the ES **[REP1-012]** concludes that overall, the Scheme will provide a beneficial significant effect on the climate and a net reduction in greenhouse gas emissions over the lifetime of the Scheme.

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	source of GHG emissions; these are expected to be sourced from China or a country of similar distance. 2. *The worst case total GHG emissions from the construction phase are estimated to equate to around 130,815 tCO2e. When annualised, the total annual construction emissions equate to around 65,407 tCO2e. GHG emissions from the construction of the Scheme are considered to have a minor adverse effect on the climate (a negligible significant effect is not possible where any GHG emissions are released to the atmosphere). The overall effect on GHGs from construction is considered not significant in EIA terms."*	
WLDC 13.20	WLDC identify the following positive impact during operation: *"The ES concludes that overall, the Scheme will provide a major beneficial significant effect on the climate and a net reduction in GHG emissions over the lifetime of the Scheme. It is expected that the savings from the scheme would result in offsetting the construction emissions within 3 years of operation. Assuming baseline values for emissions from the Scheme, over the estimated 40 year lifespan there would be a reduction of 3,981,049 tCO2e from the Scheme compared to a scenario where the Scheme does not go ahead."*	The Applicant's position aligns with WLDC's comments.
WLDC 13.21	WLDC identify no neutral impacts during operation.	The Applicant's position aligns with WLDC's comments.
WLDC 13.22	WLDC identify the following negative impact during operation:	The Applicant's position aligns with WLDC's comments.

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	"GHG emissions will be generated as a result of operational activities such as the transportation of operational workers to and from the Site, water consumption and replacement of on-site materials. The production of replacement batteries at the midpoint of the project's lifespan is the greatest contribution to GHG emissions during the operational stage, estimated to equate to around 15,984 tCO2e. This accounts for 42.76% of the total operational emissions. However, these emissions will be offset by the net reduction in emissions during operation (see above) and therefore no significant negative impacts are anticipated."	
WLDC 13.23 WLDC 13.24	WLDC has identified no positive and no neutral impacts during decommissioning.	The Applicant's position aligns with WLDC's comments.
WLDC 13.25 to 13.27	WLDC identify the following negative impacts during decommissioning: 1. *"Despite the ES not identifying any significant residual effects on climate change during decommissioning, as the project lifespan of the Scheme is estimated to be 40 years, the ES admits 'it is unknown at this stage what the effects will be in the future' during this stage. The SoS is therefore minded to keep this in mind during their assessment of the Scheme.* 2. *Whilst a calculation of 12,531 tCO2e has been provided, there is a possibility that the emissions could be higher. It should be noted that the embodied carbon within the products would not require consideration*	The Applicant's position aligns with WLDC's comments.

LIR Ref.	Summary	Applicant's Response
	within the decommissioning process as they would not need to be produced again or shipped as a result of decommissioning of the scheme. It is therefore likely that decommissioning effects would be lower than construction. The assumption is for a closed loop disposal within the UK. 3. *The main source (98.29%) of emissions from the decommissioning stage will be from worker transportation, totalling 12,316 tCO2e. It is expected that the magnitude of effect will be low and therefore the decommissioning stage will result in only minor adverse effects which is not significant in terms of EIA."*	
WLDC 13.29 to 13.34	WLDC identify the following positive cumulative impacts during decommissioning: 1. The Scheme is being developed in tandem alongside the nearby Cottam Solar Project. It is considered that there would be positive cumulative effects should both developments construction periods overlap as this could allow for consolidation of vehicle trips which would lead to less GHG emissions than if the construction periods were staggered. The cumulative emissions from both projects is below 1% of the 4th UK carbon budget and so not expected to result in a significant effect. 2. The Gate Burton Energy Park has also been considered. The cumulative effect of the construction phases of this scheme is not likely to	The Applicant's position aligns with WLDC's comments.

LIR Ref.	Summary	Applicant's Response
	be >1% of the 4th Carbon Budget. While there may be some cumulative effects from combined GHG emissions during the construction phase, it is considered that, as with the Scheme, the offset from reduced emissions over the operational phase of the development would ultimately result in a beneficial cumulative effect with regards to Climate Change. 3. The GHG assessment has included for the cumulative effect of emissions. There are potential net savings of GHG emissions for joint working practices with the West Burton, Gate Burton and Tillbridge project ducts and cables if they are being constructed at the same time. 4. The overall increase in renewables offered by the increase in solar capacity as a result of each of these schemes would lead to further reduced Greenhouse Gas Emissions and would have a net cumulative positive effect. 5. In summary, there are not anticipated to be any significant cumulative effects as a result of all three developments with regards to Climate Change in either the construction or operational scenarios. 6. The cumulative effect of the solar developments will be major beneficial in terms of Climate Change Resilience given that the combined effect of the	

LIR Ref.	Summary	Applicant's Response
	renewable energy will serve to counter the effects of Climate Change.	
LCC 6.15	*"The West Burton Solar Project would make a significant contribution towards renewable energy generation, providing the electricity to power an equivalent of approximately 144,000 homes. This contribution aligns to key commitments at the national level and within the adopted and emerging NPS recognising the importance of the Government's commitments to cut greenhouse gases by 80% of 2050."*	The Applicant's position aligns with LCC's comments.
LCC 6.16	*"The Council's position is therefore that, adopting a 'whole life' approach to GHG emissions, there are no negative and neutral impacts and that significant positive impacts would accrue."*	The Applicant's position aligns with LCC's comments.
2.4 Cultural Heritage		
WLDC 11.1	WLDC raise the following points arising from the review of the Cultural Heritage chapter of the ES: 1. There will be several significant impacts on designated heritage assets including Scheduled Monuments and Grade I listed buildings. 2. Although some of the impacts on heritage assets are considered not significant, there are multiple slight adverse impacts. 3. The Scheme would not comply with Policy S57: The Historic Environment of the Central Lincolnshire	The Applicant notes that with the proposed mitigation in place, 6.2.13 Environmental Statement - Chapter 13 Cultural Heritage **[APP-051]** concludes in Tables 13.32 - 13.34 that there would be large adverse (I.e., 'significant') effects at one Scheduled Monument, the medieval bishop's palace and deer park, Stow Park (1019229). No likely significant effects are identified on any other designated heritage assets as detailed in Table 23.1 of 6.2.23 Environmental Statement - Chapter 23 Summary of Significant Effects **[APP-062].** 6.3.13.5 Environmental Statement - Appendix 13.5 Heritage Statement **[APP-117 to APP-119]** concludes that, following the implementation of proposed mitigation, and with consideration to the reversable nature of the Scheme, the overall harm to the medieval bishop's palace and deer park, Stow Park

LIR Ref.	Summary	Applicant's Response
	Local Plan, as it would not protect or conserve the historic environment of Central Lincolnshire.	(1019229) will be less than substantial (paragraph 13.7.42) 6.3.13.5 Environmental Statement - Appendix 13.5 Heritage Statement **[APP-117 to APP-119].** 7.5 Planning Statement **[EN010132/ EX3/WB7.5_A]** discusses how any harm to the setting of the Scheduled Monument is outweighed by the public benefits of the Scheme. Therefore, the Applicant considers that the Scheme is in accordance with Policy S57 of the Central Lincolnshire Local Plan (2023), which states that "where a development proposal would result in less than substantial harm to a designated heritage asset, permission will only be granted where the public benefits, including, where appropriate, securing its optimum viable use, outweigh the harm." The Applicant also believes the Scheme is in accordance with the Overarching National Policy Statement for Energy EN-1 (November 2023) Paragraph 5.9.32 and NPPF (2023) Paragraph 208: "*Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use".* Paragraph 2.3.8 of National Policy Statement for Renewable Energy Infrastructure EN-3 (November 2023) also states: *"In considering the impact on the historic environment as set out in Section 5.9 of EN-1 and whether the Secretary of State is satisfied that the substantial public benefits would outweigh any loss or harm to the significance of a designated heritage asset, the Secretary of State should take into account the positive role that large-scale renewable projects play in the mitigation of climate change, the delivery of energy security and the urgency of meeting the net zero target."* The Applicant also highlights the neutral to moderate beneficial effects identified during the operational phase as a result of non-designated

LIR Ref.	Summary	Applicant's Response
		archaeological remains being removed from the agricultural cycle of regular ploughing, which will enable the conservation and protection of numerous archaeological heritage assets within the Order Limits of the Scheme (paragraph 13.7.43) **6.2.13 Environmental Statement - Chapter 13 Cultural Heritage [APP-051].**
WLDC 11.7 WLDC 11.8	*"There are no positive effects during construction.* *There are no neutral effects during construction."*	While the Applicant notes that these comments reflect the assessment provided in **6.2.13 Environmental Statement - Chapter 13 Cultural Heritage [APP-051]**, the Applicant highlights that neutral to moderate beneficial effects have been identified during the operational phase of the Scheme as a result of non-designated archaeological remains being removed from the agricultural cycle of regular ploughing (paragraph 13.7.43) **6.2.13 Environmental Statement - Chapter 13 Cultural Heritage [APP-051]**.
WLDC 11.9 to 11.19	WLDC has identified the following negative impacts during construction: 1. Construction in the vicinity of the eastern park pale at the medieval bishop's palace and deer park (Stow Park) will result in additional cumulative impacts to the setting of the Scheduled Monument on top of those that would be experienced as a result of the other construction activity that would be occurring in the vicinity of the western park pale and the site of the bishop's palace. These impacts would constitute 'Considerable changes to significance (or the ability to appreciate it) due to changes to setting. 2. Effects of Slight Adverse significance to the medieval settlement and open field system immediately	The Applicant notes that these comments reflect the paragraphs 13.7.12, 13.7.13, 13.7.18 to 13.7.22, 13.7.25 and 13.7.34 **6.2.13 Environmental Statement – Chapter 13 Cultural Heritage [APP-051]**. With consideration to item 10, As detailed in paragraph 13.7.30 of **6.2.13 Environmental Statement – Chapter 13_Cultural Heritage [APP-051]** construction phase effects would range from Neutral to Slight Adverse, and therefore 'not significant' for all non-designated buildings.

LIR Ref.	Summary	Applicant's Response
	southeast of Low Farm (NHLE 1017741) due to the temporary laydown area should this be visible. 3. There is the potential for there to be Slight Adverse effects at four Scheduled Monuments, and up to Moderate Adverse effects at one Scheduled Monument (the medieval bishop's palace and deer park, Stow Park – NHLE 1019229), as detailed in Appendix 13.8 (Doc. Ref. EN010132/APP/WB6.3.13.8). 4. There would be impacts to earthworks at North Ingleby due to the landscape planting proposals which would have an impact upon a raised causeway visible on LiDAR which represents the course of an old road or trackway. This earthwork is within the HER polygons for both North Ingleby DMV (AR13) and Manor House Park (AR14), though it is uncertain as to which of these receptors this is best assigned to, indeed if any. The road is depicted on late 18th and early 19th century maps and may represent a post-medieval trackway, though the possibility that it could have medieval origins and therefore be associated with the DMV cannot be discounted. If this were the case, then the change would be considered of Minor Adverse magnitude to this receptor of High value, and therefore Moderate Adverse effects.	

LIR Ref.	Summary	Applicant's Response
	5. At AR25 a possible enclosure of unknown date would be largely destroyed by the cable route cutting through it. 6. At AR26 geophysical anomalies have been interpreted as a possible ring ditch and field system, though it has not been confirmed whether these are of prehistoric origin or natural features. If the former, then these would be considered to be of Medium value, and the likely impacts of Major Adverse magnitude caused by the cable route and/or laydown area at this location would result in Large Adverse effects. 7. At Stow Park DMV (AR44) most of the known extent of archaeological remains as identified from geophysical survey, air photo assessment, and evaluation trenching has been excluded from the Order Limits. However, a landscape mitigation requirement to provide screening for a property on Till Bridge Lane means that planting has been proposed across an area where air photographs and historic mapping has identified the course of the road which may represent the original medieval entrance into the forecourt to the bishop's palace. Archaeological evaluation has also produced evidence that tentatively suggests that there might have been an earlier Anglo-Saxon settlement in this vicinity that predates the bishop's palace. However, the evaluation also indicated that features identified	

LIR Ref.	Summary	Applicant's Response
	from air photographs in this area may have been truncated by recent ploughing, therefore the magnitude of the impacts is uncertain. Should the proposed planting impact upon significant medieval remains in this area, then it is concluded that these could be of Medium or High value, and the predicted impacts that could range from Negligible to Minor Adverse magnitude would result in Slight or Moderate Adverse effects. 8. At AR64 there is a possible rectilinear enclosure of unknown date identified by geophysical survey that could be largely destroyed by the cable route cutting through it. However, its value is uncertain, as it could for example represent agricultural features of negligible value or a prehistoric enclosure of Medium value. If the latter, then the expected impacts of Major Adverse magnitude would result in Large Adverse effects. 9. Potential for impacts of a Minor Adverse magnitude at the Grade I Church of St Botolph, Saxilby with Ingleby (1359490) which are considered to be Slight Adverse effects due to these occurring along a limited stretch of one of the long views towards the church when travelling southwards from Ingleby to Saxilby.	

LIR Ref.	Summary	Applicant's Response
	10. For 11 non-designated buildings, construction phase effects would range from Neutral to Slight Adverse, and therefore 'not significant'. 11. The construction phase specific impacts to the historic landscape would result in effects that are 'not significant' in EIA terms for 23 receptors.	
WLDC 11.20	WLDC has identified the following positive impacts during operation: *"The impacts to buried archaeological features during the operational phase would be of a largely beneficial nature, due to these remains being taken out of the agricultural cycle of regular ploughing which most of the field parcels within the Order Limits are currently subject to."*	The Applicant notes that these comments reflect paragraph 13.7.43 of **6.2.13 Environmental Statement - Chapter 13 Cultural Heritage [APP-051]**.
WLDC 11.21 to 11.25	WLDC has identified the following negative impacts during operation: 1. *"At the Roman villa west of Scampton Cliff Farm (NHLE 1005041) Scheduled Monument, in the absence of mitigation, the construction and operational phases would result in effects of Slight Adverse significance. It is concluded that whilst the landscape proposals, once matured by Year 15, would reduce the visual impact from this designated heritage asset, the Scheme would still be likely to be visible from this elevated position and therefore this score would remain unchanged.* 2. *For the medieval bishop's palace and deer park, Stow Park (NHLE 1019229) it is considered that the*	The Applicant notes that these comments reflect the paragraphs 13.8.6, 13.8.7, 13.7.46 and 13.8.9 of **6.2.13 Environmental Statement - Chapter 13 Cultural Heritage [APP-051]**. With consideration to item 4, as stated in Paragraph 13.8.8 of **6.2.13 Environmental Statement - Chapter 13 Cultural Heritage [APP-051]** it is considered that the Slight Adverse effects predicted at Scheduled Monuments (with the exclusion of Roman villa west of Scampton Cliff Farm (NHLE 1005041) and the medieval bishop's palace and deer park, Stow Park (NHLE 1019229)), Listed Buildings, and non-designated historic buildings *"would be reduced to Neutral once the landscape proposal have matured (i.e., by Year 15)".*

LIR Ref.	Summary	Applicant's Response
	landscape mitigation proposals would not mitigate the impacts to the setting of the Scheduled Monument due to the proposed layout of panels being in close proximity to the scheduled areas, and therefore the effects would be Large Adverse. 3. *During the operational phase of the Scheme, there would be impacts of a Negligible Adverse magnitude at five of the Grade II Listed Buildings, two of which were scored as effects of Neutral significance, whilst three were scored as Slight Adverse. In addition to this, there would be impacts of Minor Adverse magnitude at four Grade II Listed Buildings and one Grade II* Listed Building, all of which would result in effects of Slight Adverse significance. Following mitigation, impacts to Listed Buildings will be reduced to slight adverse at most.* 4. *For most of the non-designated historic buildings assessed, the effects would be either Neutral or Slight Adverse effects, i.e., 'not significant', but at Greenfields Farm, Stow (HB11), and Poplar Farm, Marton (HB17) it is concluded that the Major Adverse impacts could result in 'significant' Moderate Adverse effects in the absence of additional mitigation. Following mitigation, impacts to non-designated historic buildings will be slight adverse at most.* 5. *In terms of impacts to the historic landscape, it is considered that the new planting and reinforcement of*	

LIR Ref.	Summary	Applicant's Response
	existing vegetation would have an overall beneficial effect by reinforcing the historic landscape character, but it is considered that the assessment scores for individual HLC units would remain unchanged. These vary from negligible to moderate adverse."	
WLDC 11.26	WLDC make the following comments in relation to decommissioning: *"The decommissioning phase would require plant movement and other activities similar to those employed during the construction phase, which could have an adverse impact upon the settings of nearby heritage assets. The ES assesses that the impact would be neutral as the impacts are no greater than during the operational phase, and would be temporary, short term and reversible in nature. "*	The Applicant notes that these comments reflect paragraph 13.7.55 of **6.2.13 Environmental Statement - Chapter 13 Cultural Heritage [APP-051]**.
WLDC 11.27	*"For the settings of heritage assets, it is considered that the zone of influence (ZOI) is very much constrained for those assets located within the lowlands of the Trent valley, as confirmed by the ZTVs for these assets produced as part of the Heritage Statement. The only 'significant' effect identified due to impacts to the setting of a designated heritage asset is at the Medieval bishop's Palace and Deer Park, Stow Park (NHLE 1019229)."*	The Applicant notes that these comments reflect paragraph 13.10.3 of **6.2.13 Environmental Statement - Chapter 13 Cultural Heritage [APP-051]**.
WLDC 11.28	*"Slight Adverse effects (i.e., effects that are 'not significant') have been identified at the following Scheduled Monuments for the Scheme:* • *Deserted village of Dunstall (NHLE 1004996);*	Applicant believes this comment relates to the Cottam Solar project (ES Chapter 13 **[EN010133/C6.2.13/APP-048]** Paragraph 13.10.4). The equivalent paragraph in the **6.2.13 Environmental Statement - Chapter 13 Cultural Heritage [APP-051]** (Paragraph 13.10.4) for the Scheme states:

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	• *Roman villa west of Scampton Cliff Farm (NHLE 1005041);* • *Southorpe medieval settlement (NHLE 1016794);* • *Gilby medieval settlement (NHLE 1016795); and* • *Coates medieval settlement and moated site (NHLE 1016979)."*	*"Slight Adverse effects (i.e., effects that are 'not significant') have been identified at the following Scheduled Monuments for the mitigated Scheme:* *• Deserted village of North Ingleby (1003570)* *• Roman villa west of Scampton Cliff Farm (NHLE 1005041)* *• Broxholme medieval settlement and cultivation remains (1016797)* *• Medieval settlement and open field system immediately south east of Low Farm (NHLE 1017741) "*
WLDC 11.29	*"Slight Adverse effects (i.e., effects that are 'not significant') have also been identified at the following Listed Buildings for the Scheme:* • *Fillingham Castle (NHLE 1166045);* • *Glentworth Hall (NHLE 1063348);* • *Former stables at Glentworth Hall (NHLE 1166094);* • *Thorpe in the Fallows Farmhouse (NHLE 1308921);* • *Mount Pleasant Farmhouse east of Laughton (NHLE 1317186); and* • *Corringham Windmill (NHLE 1359417)."*	Applicant believes this comment relates to the Cottam Solar project (ES Chapter 13 **[EN010133/C6.2.13/APP-048]** Paragraph 13.10.5). The equivalent paragraph in the **6.2.13 Environmental Statement - Chapter 13_Cultural Heritage [APP-051]** (Paragraph 13.10.5) for the Scheme states: *"Slight Adverse effects (i.e., effects that are 'not significant') have also been identified at the following Listed Buildings for the Scheme:* *• Subscription Mill (NHLE 1064067)* *• Church of All Saints, Broxholme (NHLE 1064095)"*

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WLDC 11.30	*"Slight Adverse effects (i.e., effects that are 'not significant') have also been identified at the following Registered Park and Garden for the Scheme:* • *Fillingham Castle (NHLE 1000977)."*	Applicant believes this comment relates to the Cottam Solar project (ES Chapter 13 **[EN010133/C6.2.13 - APP-048]** Paragraph 13.10.6). No adverse effects were identified by the Scheme to any Registered Parks and Gardens. As detailed in paragraph 13.5.23 of **6.2.13 Environmental Statement - Chapter 13 Cultural Heritage [APP-051]** for the Scheme, there are no Registered Parks and Gardens within the 5km study area.
WLDC 11.31	*"It is considered that there could only be cumulative effects at those heritage assets identified above (in Paragraph 13.9.2 where views from the Lincoln Cliff contribute to the significance of the asset:* • *Roman villa west of Scampton Cliff Farm (NHLE 1005041 Fillingham Castle (NHLE 1166045/NHLE 1000977);* • *Glentworth Hall (NHLE 1063348); and* • *Former stables at Glentworth Hall (NHLE 1166094)."*	Applicant believes this comment relates to the Cottam Solar project (ES Chapter 13 **[EN010133/C6.2.13 - APP-048]** Paragraph 13.10.7). The equivalent paragraph in the **6.2.13 Environmental Statement - Chapter 13 Cultural Heritage [APP-051]** (Paragraph 13.10.6) states: *"It is considered that there could only be cumulative effects at the heritage asset identified above (in Paragraph 13.9.2) where views from the Lincoln Cliff contribute to the significance of the asset:* *• Roman villa west of Scampton Cliff Farm (NHLE 1005041)"*
WLDC 11.32	*"This is due to the fact that the other NSIPs in the vicinity of the Scheme would also be likely to be visible from these elevated viewpoints along the Lincoln Cliff, but not from those situated in the Trent Valley. Should all of the NSIPs identified in paragraph 13.10.1 above be permitted and constructed, then the Slight Adverse effects identified at those heritage assets located on the Lincoln Cliff with extensive views across the Trent valley would increase in magnitude as a result of the cumulative effects, and whilst it is possible that this could result in Moderate Adverse effects or above (i.e., 'significant' effects) at one or more of these*	Applicant believes this comment relates to the Cottam Solar project (ES Chapter 13 **[EN010133/C6.2.13 - APP-048]** Paragraph 13.10.7). A review of cumulative impacts to Roman villa west of Scampton Cliff Farm (NHLE 1005041) was undertaken in 2023 during the winter period, when foliage coverage is 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 Adverse cumulative impact at the Roman Villa west of Scampton (NHLE 1005041) (see **WB8.1.9_B Joint Report on Interrelationships between Nationally Significant Infrastructure Projects Revision B [REP2-010]**).

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	assets, this would require the results of further detailed design and assessment of the other NSIPs to confirm."	
NCC 9.5	*"It would appear significant areas of the development site, including the cable route, have had no evaluation through trial trenching, which is considered unacceptable, and a major risk to the overall sustainable deliverability of the scheme."*	The Applicant considers that a reasonable, proportionate and consistent approach has been taken to trial trenching evaluation, guided by national and local guidance that has enabled the collection of high-quality reliable data. This has provided an adequate understanding of the archaeological potential and developmental impacts as set out in **6.2.13 Environmental Statement - Chapter 13 Cultural Heritage [APP-051]** and has been used to formulate an appropriate mitigation strategy as set out in **6.3.13.7 Environmental Statement - Appendix 13.7 Archaeological Mitigation WSI [APP-122].** The WSI is secured through requirement 12 in Schedule 2 to the Draft Development Consent Order **[EN010132/EX3/WB3.1_C]**. In the first instance the archaeological assessment comprised: **6.3.13.1 Environmental Statement - Appendix 13.1 Archaeological Desk-Based Assessments [APP-105** to **APP-108]**, **6.3.13.2 Environmental Statement - Appendix 13.2 Archaeological Geophysical Survey Reports [APP-109** to **APP-114]**, **6.3.13.3 Environmental Statement - Appendix 13.3 Geoarchaeological DBA** (Desk-Based Assessment) **[APP-115]** and **6.3.13.4 Environmental Statement - Appendix 13.4 AP** (Air Photo) **and LiDAR Reports [APP-116]**, which successfully identified the absence/ presence/ extent of archaeological sites within the Order Limits of the Scheme. An informed programme of **6.3.13.6 Environmental Statement - Appendix 13.6 Archaeological Evaluation Trenching Reports [APP-120** to **APP-121]** was undertaken on the shared cable corridor, which runs adjacent to the River Trent, and both verified the results of the non-intrusive assessments, and where archaeological deposits had been identified, provided further

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		information regarding their extent, character, preservation, and archaeological significance.
NCC 9.6 NCC 9.7 NCC 9.8	*"The LIR prepared by LCC archaeological advisers notes the inadequacy of the archaeological work to date, and NCC archaeology agrees completely with their stance. The trial trenching of areas which have not shown geophysical anomalies should not be regarded as an optional extra, but as a professional archaeological requirement.* *This kind of approach is the only safe way of ensuring a reasonable method of evaluating archaeological risk and mitigating it appropriately.* *The mitigation proposals are considered inadequate and rely on a flawed information base."*	The combined programme of non-intrusive and intrusive evaluation is considered by the Applicant to have met the objectives of a field evaluation as set out by CIfA (2023) and so is sufficient to inform the DCO Application. There is no professional guidance that details the extent or timing of evaluation trenching. The Applicant considers that the approach to evaluation trenching should be established on a site by site basis with consideration to site conditions (i.e. with consideration to geological and modern activity), the usefulness of archaeological baseline and non-intrusive evaluation works in establishing the absence / presence of archaeological deposits and the nature of the development and any associated ground disturbance. It is considered, based on the evidence of the range of non-intrusive investigations and targeted evaluation trenching, that there is low potential for otherwise unrecorded archaeological remains of greater than local significance to survive within the Sites, and that if these were present, the solar mounts would have limited impact. Consequently, the Applicant does not consider that further baseline characterisation is required to inform the DCO Application, and that there is sufficient information to inform the works required as part of a post-consent **6.3.13.7 Environmental Statement - Appendix 13.7 Archaeological Mitigation WSI [APP-122]**, as secured by Requirement 12 of Schedule 2 in **3.1_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C]**. The Applicant also highlights the numerous examples of geophysical survey being used as an evaluation technique either in isolation or with a low sample of targeted evaluation trial trenching undertaken pre-determination

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		to evaluate the archaeological potential of land within solar schemes in the Nottinghamshire and Lincolnshire. Examples of solar schemes approved include: Tuxford Road Solar Farm (21/01577/FULM), Cotmoor Lane (20/01242/FULM), Bluestone Heath Road (N/163/00245/15), Gorse Lane (19/0060/FUL) and Cowbridge Road, Bicker Fen Solar Array (H04/0849/22).
NCC 9.9	*"NCC archaeology prefer not to use the term "watching brief" in line with current HE advice as this has historic connotations of archaeologists watching archaeological deposits being removed by machines with scant record being made. Strip, map and sample (SMS) is our preferred term and approach, and our policy is to see complete easement strips subject to SMS, enhanced with select areas of excavation where features have been identified, plus genuine preservation in situ by avoidance of significant/ complex areas of archaeological activity."*	The Applicant notes this comment. The Applicant has requested comments to **6.3.13.7 Environmental Statement - Appendix 13.7 Archaeological Mitigation WSI [APP-122]** from the various archaeological advisors to Nottinghamshire and Lincolnshire, and looks forward to receiving these, so that suitable wording can be agreed within the document between all parties on a without prejudice basis. Further details of the matters under discussion and matters agreed between NCC and the Applicant can be found in sections 3.4 and 4.4 of the Statement of Common Ground between the Applicant, NCC and Bassetlaw District Council **[REP1-068]**.
LCC 12.10 to LCC 12.12	1. *"The Council has serious concerns about the approach and conclusions made with regard to the impacts of this proposal on cultural heritage assets within Lincolnshire. The Council has consistently advised the Applicant that there must be enough pre-determination evaluation undertaken to determine the impact of the development upon potential archaeology and enough assessment undertaken to understand the impact on settings of heritage assets and the historic landscape.* 2. *Throughout the pre-application stage (i.e. including the Scoping and PEIR stages) the Council has advised on*	The Applicant respectfully disagrees with LCC and considers that sufficient evaluation, proportionate to the stage at which the Scheme is at, has been undertaken to inform the DCO Application and any works required as part of a post-consent **6.3.13.7 Environmental Statement - Appendix 13.7 Archaeological Mitigation WSI (Written Scheme of Investigation) [APP-122]** as secured by Requirement 12 of Schedule 2 in **3.1_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C].** The Applicant considers that they have taken a reasonable, proportionate and consistent approach guided by national and local guidance that has enabled the collection of high-quality reliable data. This has provided an adequate understanding of the archaeological potential and developmental

LIR Ref.	Summary	Applicant's Response
	detailed specific requirements for this proposed development and the need to provide a sufficient evidence base to allow for sufficient understanding of the site specific archaeological potential and in order to enable a mitigation strategy to be produced which is reasonable, appropriate and fit for purpose." 3. *"The Council is concerned by the lack of evaluation trial trenching in 'blank' areas where previous archaeological evaluation techniques have not identified archaeological potential. An appropriate fit for purpose mitigation strategy cannot be achieved in areas that have not been subject to evaluation trial trenching.* 4. *The issue of insufficient trenching evaluation has also been highlighted in discussions with the archaeological consultants where Historic England stated that the areas not subjected to evaluation trial trenching appeared to be quite large and so the project contained a high level of risk.*	impacts as set out in **6.2.13 Environmental Statement - Chapter 13 Cultural Heritage [APP-051]** and has been used to formulate an appropriate mitigation strategy as set out in **6.3.13.7 Environmental Statement - Appendix 13.7 Archaeological Mitigation WSI [APP-122].** In the first instance the archaeological assessment comprised: **6.3.13.1 Environmental Statement - Appendix 13.1 Archaeological Desk-Based Assessments [APP-105** to **APP-108]**, **6.3.13.2 Environmental Statement - Appendix 13.2 Archaeological Geophysical Survey Reports [APP-109** to **APP-114]**, **6.3.13.3 Environmental Statement - Appendix 13.3 Geoarchaeological DBA** (Desk-Based Assessment) **[APP-115]** and **6.3.13.4 Environmental Statement - Appendix 13.4 AP** (Air Photo) **and LiDAR Reports [APP-116]**, which successfully identified the absence/ presence/ extent of archaeological sites within the Order limits of the Scheme. An informed programme of **6.3.13.6 Environmental Statement - Appendix 13.6 Archaeological Evaluation Trenching Reports [APP-120** to **APP-121]** both verified the results of the non-intrusive assessments, and where archaeological deposits had been identified, provided further information regarding their extent, character, preservation, and archaeological significance. The Applicant considers that this approach has provided a sufficient level of baseline Information, as captured within Section 13.5 of **6.2.13 Environmental Statement - Chapter 13_Cultural Heritage [APP-051]**) on which the Examining Authority can issue a recommendation and the Secretary of State can determine the DCO Application, allowing for suitable archaeological mitigation to be carried out pursuant to the implementation of **6.3.13.7 Environmental Statement - Appendix 13.7 Archaeological Mitigation WSI [APP-122]** which is secured by Requirement 12 of Schedule 2

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		to **3.1_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C]**. The Applicant agrees that in a meeting on the 22/03/2023, Historic England "expressed concern over absorption of a high level of risk through not evaluating 'blank' areas". Historic England also stated that they believed that "…a middle ground could be achieved to proportionately manage risk" and that "whilst it would be preferable to address additional trenching pre-consent, a phase of additional conditioned trenching post-consent (but as far ahead of construction as possible) would be a the next-best option to de-risk 'blank' areas". Further details of the matters under discussion and matters agreed between LCC and the Applicant can be found in sections 3.4 and 4.4 of the Statement of Common Ground between the Applicant and LCC **[REP1-061]**.
LCC to 12.14 12.17	1. *During the evaluation phase trench plans were agreed with the Council for individual fields, however an overall evaluation plan of the entire redline boundary was not forthcoming. The applicant's consultant consistently agreed to provide this information, but failed to do so. This piecemeal reactive approach has been a major concern regarding adequate trenching cover across the site. It has become clear that 2% trenching has taken place only in certain parts of the redline boundary.* 2. *Despite this, the submitted documents present the Cultural Heritage as completely assessed and evaluated with a full and complete understanding of the*	The Applicant respectfully disagrees with Lincolnshire Historic Place Team (LHPT) and considers that sufficient evaluation, which is proportionate and in scope for the stage at which the Scheme has reached, has been undertaken to inform the DCO Application. The evaluation works are also sufficient to inform any required post-consent works as detailed and secured through **6.3.13.7 Environmental Statement - Appendix 13.7 Archaeological Mitigation WSI [APP-122]**, which is secured by Requirement 12 of Schedule 2 to **3.1_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C].** The Applicant considers that they have taken a reasonable, proportionate and consistent approach supported by national and local guidance and best practice, which has enabled the collection of high-quality reliable data. This has provided an adequate understanding of the archaeological potential and developmental impacts as set out in **6.2.13 Environmental Statement -**

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	archaeological resource across the site. This is not the case. 3. *Inadequate field evaluation has been undertaken with 342 trenches across 886ha, less than 0.34% of the Order Limits boundary. With 2% trenching this means that informed appropriate mitigation measures therefore cannot exist for nearly 80% of the site. The submitted documents are therefore not fit for purpose nor are they in accordance with professional standards.* 4.	**Chapter 13_Cultural Heritage [APP-051]**, and has been used to formulate an appropriate mitigation strategy as set out in **6.3.13.7 Environmental Statement - Appendix 13.7 Archaeological Mitigation WSI [APP-122].** In a meeting between the Applicant, LHPT and the Planning Inspectorate on the 09.06.2022, all parties agreed a staged approach to trenching, commencing on sensitive locations identified by the geophysical survey (Appendix 1, Table 3.1 of this Document and **6.3.13.9 ES Appendix 13.9 Consultation Response Tables [APP-124]**. The location of trenches was informed by **6.3.13.1 Environmental Statement - Appendix 13.1 Archaeological Desk-Based Assessments [APP-105 to APP-108],**–- including Portable Antiquities Scheme (PAS), Historic Landscape Characterisation (HLC), National Record of Historic Environment (NRHE), National Heritage List for England (NHLE), National Mapping Programme (NMP) and Historic Environment Record (HER) data and historic map regression–- **6.3.13.2 Environmental Statement - Appendix 13.2 Archaeological Geophysical Survey Reports [APP-109 to APP-114], 6.3.13.3 Environmental Statement - Appendix 13.3 Geoarchaeological DBA** (Desk-Based Assessment) **[APP-115] and 6.3.13.4 Environmental Statement - Appendix 13.4 AP** (Air Photo) **and LiDAR Reports [APP-116],** as well as with consideration to walkover surveys and topographic variations. An overall plan of the Order Limits was submitted to LHPT as part of the Written Scheme of Investigation (WSI) for the evaluation trial trenching on 14.07.2022. Individual trench plans were provided to LHPT as produced, and changes were made to the location of trenches as requested by LHPT. Additional trenches were agreed with LHPT in West Burton 3. As requested by LHPT, trench plans, available in **6.3.13.6 Environmental Statement -**

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		Appendix 13.6 Archaeological Evaluation Trenching Reports [APP-120 to APP-121], were issued to LHPT on 25.05.2023. The Applicant considers that the phased approach has enabled a pragmatic and responsive mechanism to deliver an informed programme of trenching, which has provided a sufficient level of baseline information, as captured within Section 13.5 of **6.2.13 Environmental Statement - Chapter 13 Cultural Heritage [APP-051]**, on which the Examining Authority can issue a recommendation and the Secretary of State can determine the DCO Application, and formulate an appropriate archaeological mitigation strategy. Further details of the correspondence and negotiations between LCC and the Applicant can be found in sections 3.4 and 4.4 of the Statement of Common Ground between the Applicant and LCC **[REP1-061]**.
LCC 12.18 to LCC 12.19	1. *As well as completely inadequate evaluation, the proposed mitigation shows little attempt at reasonable measures which adequately deal with development impact. The 'Preservation in situ' section 7.2 of Appendix 13.7: Written Scheme of Investigation for Archaeological Mitigation (APP-122) states they will use concrete ground anchors. This proposed mitigation is entirely inappropriate and unacceptable for unevaluated areas as it would cause any surviving archaeology, (especially in areas of shallow deposits which encompasses much of this agricultural landscape) to be damaged or destroyed without awareness, without investigation, and without recording. On this scheme, previously unexpected*	No burials were identified during the archaeological evaluation works for the West Burton Solar Project. The applicant assumes the comments by LCC relate to burials identified within the Order Limits of the Cottam Solar project whilst evaluation trial trenching was taking place. As evidenced by information that is available on the PINs website, the burials identified within the Cottam scheme were located adjacent to contemporaneous ditches that were recorded by geophysical survey, and so archaeological features in this area were not unexpected. The burials were located at depths of between 30 and 40cm and had been heavily disturbed by plough damage (p.98 – 99 of Cottam 1 Solar Project Interim Report: Archaeological Evaluation Trenching C6.3.13.6 ES Appendix 13.6 Archaeological Evaluation Trenching Reports_Part 1 of 2 [APP-129] of EN010133) .

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	human remains were found in the first few days of trenching, there was no indication from desk based evaluation work or geophysical survey results. It is a type of archaeology that can only be found by trial trenching and the Saxon individuals were found at a depth of 20cm below the ground surface which would be crushed and destroyed by the ground anchors and the associated groundworks." 2. *"There would be compaction when the ground anchors are installed, settling, and readjustment during the decades of operational life and ground disturbance when the ground anchors are ripped out in decommissioning as the land will need to be restored 'to its preconstruction condition at the end of the operation.' (C7.2 Outline Decommissioning Statement section 2.1.1) (APP-310). There is no mention of archaeology in the Outline Decommissioning Statement including Table 3.1 Decommissioning Mitigation and Management Measures.* 3.	The Applicant considers that, in accordance with the Central Lincolnshire Local Plan (Paragraph 10.0.16, and Policy S57) and the Overarching National Policy Statement for Energy (EN-1) (revised November 2023; Paragraphs 5.9.24 and 5.9.25), there should be a preference to preserving archaeological remains. As identified in the National Policy Statement for Renewable Energy Infrastructure (EN-3) (November 2023; Paragraph 2.10.110) as a potential benefit of solar PV developments, the Applicant highlights the positive effect the Scheme will have on the archaeological features identified within the Scheme's Order Limits, which are currently at risk from the impacts of ploughing (Paragraphs 13.7.43 and 13.7.44 of **6.2.13 Environmental Statement - Chapter 13 Cultural Heritage [APP-051]**). Consequently, where appropriate the Applicant has proposed "preservation in-situ" either in the form of 'no development' areas, non-intrusive concrete feet or directional drilling (along the cable route), to minimise harm to buried archaeological remains and where possible to allow the archaeological resource within the site to be preserved in-situ. Concrete feet are a nationally recognised method for archaeological mitigation by design. This is demonstrated by guidance provided by Cornwall Council[1], and the numerous examples of solar schemes where local planning authorities have agreed the use of concrete feet to safeguard buried archaeological remains. Examples of schemes where concrete feet have been considered appropriate mitigation include The Grange (19/01408/FULM) in Nottinghamshire, Land south-east Of A6108 Darlington Road (21/00931/FULL) in North Yorkshire, Eastfield Farm (19/04321/STPLF) in East Riding of Yorkshire, Conesby Solar Park (PA/2018/2140) in North

[1] https://files.bregroup.com/solar/KN5524_Planning_Guidance_reduced.pdf, P.13

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		Lincolnshire, Vine Farm, Shingay-cum-Wendy (S/1067/14/FL) in Cambridgeshire. As detailed in **6.3.13.7 Environmental Statement - Appendix 13.7 Archaeological Mitigation WSI** (Written Scheme of Investigation) **[APP-122]**, all areas recommended by the Applicant for archaeological mitigation using concrete feet have been subject to field evaluation using geophysical survey and trial trenching. As stated in Paragraph 13.7.47 of **6.2.13 Environmental Statement - Chapter 13 Cultural Heritage [APP-051]**, a Decommissioning Environmental Management Plan will be prepared prior to decommissioning and approved by the relevant planning authorities. This is secured by Requirement 12 of Schedule 2 to **3.1_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C].** Further details of the correspondence and negotiations between LCC and the Applicant can be found in sections 3.4 and 4.4 of the Statement of Common Ground between the Applicant and LCC **[REP1-061]**.
LCC 12.20	1. *Looking through the submission documents there are also extensive further ground impacts from other proposed mitigations such as wildlife ponds, woodland, and shelterbelt planting, and bird habitat scrapes up to 0.5m deep. All these proposed mitigations have significant below ground impacts yet the potential impact on surviving archaeological remains is not known, and again no archaeological mitigation is proposed."*	Where the evaluation has identified a potential for archaeological remains to be present, mitigation in the form of 'strip, map and record' has been proposed. Where non-intrusive survey and assessment, for example geophysical survey and evaluation trenching, has not identified archaeological remains, the Applicant considers that no archaeological mitigation is required (**6.3.13.7 Environmental Statement - Appendix 13.7 Archaeological Mitigation WSI [APP-122]**). If further archaeological mitigation is required in advance of the implementation of specific landscape and ecological mitigation, the Applicant considered that an archaeological 'watching brief', monitoring and recording

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		during topsoil stripping as part of the construction process would be sufficient mitigation (**6.3.13.7 Environmental Statement – Appendix 13.7 Archaeological Mitigation WSI [APP-122]**). Further details of the correspondence and negotiations between LCC and the Applicant can be found in sections 3.4 and 4.4 of the Statement of Common Ground between the Applicant and LCC **[REP1-061]**.
LCC 12.21 to LCC 12.23	*"The applicant has failed to provide a reasonable baseline assessment of the archaeological resource and the development's impact upon it. Further archaeological evaluation within the red line boundary and the full cable route is necessary to understand the extent, nature and significance of surviving archaeology so that appropriate mitigation can be determined."* *"There is therefore a negative construction impact upon the archaeological remains in relation to the Order limits with the degree of harm as yet unquantifiable due to the insufficient evaluation undertaken so far."*	The Applicant respectfully disagrees that it has "*failed to provide a reasonable baseline assessment of the archaeological resource and the development's impact upon it* ". The Applicant considers that the phased programme of archaeological evaluation was completed to a high standard in line with National and Local guidance and has produced high quality data that has sufficiently informed the Environmental Statement submitted as part of the DCO Application, and the need for any pre-construction archaeological works. The first phase of assessment and field evaluation comprising: **6.3.13.1 Environmental Statement - Appendix 13.1 Archaeological Desk-Based Assessments [APP-105 to APP-108], 6.3.13.2 Environmental Statement - Appendix 13.2 Archaeological Geophysical Survey Reports [APP-109 to APP-114], 6.3.13.3 Environmental Statement - Appendix 13.3 Geoarchaeological DBA** (Desk-Based Assessment) **[APP-115] and 6.3.13.4 Environmental Statement - Appendix 13.4 AP** (Air Photo) **and LiDAR Reports [APP-116]** successfully identified numerous previously unrecorded sites. In particular, the geophysical survey, which was undertaken across all accessible areas within the Scheme, identified numerous concentrations of archaeological deposits.

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		Geophysical survey is an internationally recognised evaluation methodology for identifying the absence/presence of buried archaeological remains. The Chartered Institute for Archaeology (CIfA) Standard and Guidance for Field Evaluation (2023) states "*archaeological field evaluation is a programme of non-intrusive and/or intrusive fieldwork which seeks to determines the presence or absence of archaeological features, structures, deposits, artefacts or ecofact. It may form a single or final phase of work within a defined areas or site on land, in an inter-tidal zone or under water".* There are numerous examples of geophysical survey being used as an evaluation technique either in isolation or with a low sample of targeted evaluation trial trenching to evaluate the archaeological potential of land within solar schemes in the east and north-east of England. Examples of solar schemes approved in the last five years include: Land south-east Of A6108 Darlington Road (21/00931/FULL) in North Yorkshire, Conesby House Farm (PA/2018/2140) in North Lincolnshire, Eastfield Farm (19/04321/STPLF) in East Riding of Yorkshire, Chestnut Farm (P/21/2661/2) in Leicestershire and Vine Farm (S/1067/14/FL) in Cambridgeshire). The results of **6.3.13.2 Environmental Statement - Appendix 13.2 Archaeological Geophysical Survey Reports [APP-109 to APP-114]** for the Scheme were verified by a programme of evaluation trial trenching, which targeted both concentrations of geophysical anomalies interpreted as being of an archaeological origin and 'blank' areas where no archaeological anomalies were identified. Where archaeological features were encountered there was an excellent correlation between the results of the geophysical survey and trial trenching, and the trial trench evaluation was sufficient to enhance information regarding the extent, character, preservation and significance of the archaeological features. Likewise, no significant archaeological features were identified in any of the 'blank' areas that were

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		tested. Consequently, the Applicant considers that there is no evidence to suggest undetected archaeological remains of more than local or regional significance are located within the Order Limits, and that there is not uncertainty regarding the extent of buried heritage assets within the Scheme's Order Limits. The combined programme of non-intrusive and intrusive evaluation is considered by the Applicant to have met the objectives of a field evaluation as set out by CIfA (2023) and so is sufficient to inform the DCO Application. Any further archaeological works required will be carried out pursuant to the implementation of **6.3.13.7 Environmental Statement - Appendix 13.7 Archaeological Mitigation WSI** (Written Scheme of Investigation) **[APP-122]** which is secured by Requirement 12 of Schedule 2 to **3.1_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C].** Further details of the correspondence and negotiations between LCC and the Applicant can be found in sections 3.4 and 4.4 of the Statement of Common Ground between the Applicant and LCC **[REP1-061]**.
2.5 Cumulative Effects		
WLDC 22.1 to 22.6	WLDC raise the following summary points in regard to cumulative effects: 1. *"Unlike the ES for the Gate Burton scheme, which includes a 'Cumulative Effects and Interactions' chapter (Chapter 16 of EN010131/APP/3.1), there is not an individual cumulative effects chapter of the West Burton ES. Whilst it is noted that the cumulative effects are considered in each chapter, the presentation of the*	1. The Applicant notes this comment, but considers that its approach to presenting the cumulative effects assessment is consistent with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and the Planning Inspectorate's Advice Note 17: Cumulative effects assessment (version 2 published August 2019). The Applicant also notes that, at Examination Deadline 2, the Applicant submitted **WB8.1.9_B Joint Report on Interrelationships between Nationally Significant Infrastructure Projects [REP2-010]**. This includes a Review of Cumulative Effects at Appendix E

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	cumulative effects could have been made clearer by including an individual chapter. 2. *The key impact on cumulative effects would be from the proposed Cottam, Tillbridge and Gate Burton solar farms that are located within West Lindsey.* 3. *There are several discrepancies between the ES for West Burton and Gate Burton. This is particularly relevant to the cumulative effects assessments which state conflicting levels of impacts.* 4. *The West Burton ES states that there will be beneficial or neutral cumulative landscape impacts during the operational phase of the developments. This is in conflict with Chapter 10: Landscape and Visual Amenity of the Gate Burton ES (Doc Ref. EN010131/APP/3.1).* 5. *The cumulative landscape impact assessed in the landscape and visual assessment is in contradiction of the findings in other chapters of the ES. This includes the socio-economic chapter.* 6. *The proposed Stow Park Solar Farm submitted an EIA Screening request in June 2023 and has subsequently been determined by WLDC as EIA development. The Stow Park development is situated within a parcel of land that is southeast of West Burton 3 to the east of the Sheffield to Lincoln railway line, and therefore construction traffic is likely to share the same haul	which summarises the assessments of cumulative effects for each topic for the Scheme and presents them alongside the assessments for the three other nearby DCO applications, Gate Burton Energy Park, Cottam Solar Project and Tillbridge Solar Project. This Report was produced jointly by the applicants of all four schemes, at the request of the ExA. In the interests of consistency with the presentation of information on cumulative effects in the Cottam Solar Project, the Applicant has submitted, at Deadline 3, an updated version of **Environmental Statement Chapter 23: Summary of Significant Effects [EN010132/EX3/WB6.2.23_B]**, which includes a summary of the significant cumulative effects identified in the Scheme's Environmental Statement. 2. The Applicant agrees with this comment. 3. The assessments reported in the Environmental Statements for West Burton and Gate Burton have been undertaken independently. Appendix E of the updated **WB8.1.9_B Joint Report on Interrelationships between Nationally Significant Infrastructure Projects [REP2-010]** summarises the respective findings. 4. The Environmental Impact Assessments for each of the schemes have been undertaken independently, and different impact assessments can reach different conclusions. **WB8.1.9_B Joint Report on Interrelationships between Nationally Significant Infrastructure Projects [REP2-010]** includes a review of cumulative impacts at Appendix E, based on expert specific methodologies which reach conclusions that are unique to each topic. In relation to the comment regarding the cumulative landscape assessments for the Scheme and the Gate Burton Energy Park Project, please also see the

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	routes. Therefore WLDC feel this should be included within the cumulative effects assessment."	Applicant's response to First Written Question 1.8.19 in the **Applicant's Response to the First Written Questions [EN010132/EX3/WB8.1.21]**. The Applicant is confident that the findings of the **WB6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-056]** are not in contradiction to **WB6.2.8 ES Chapter 8 Landscape and Visual Impact Assessment [APP-046]**. The Applicant notes that the cumulative assessment of impact on regional and local attractions, including local landscape, heritage, and recreational attractions attributes is only in part reliant on the assessment outcome of the LVIA. It is also reliant on assessment of cultural heritage impacts, and a qualitative assessment of the impact on the desirability of these receptors for tourists and visitors. Cumulative landscape and visual effects relating to the Cumulative Developments have been considered at section 8.10 of the LVIA **[APP-046].** The cumulative assessment has been undertaken in accordance with **6.3.8.1 Environmental Statement - Appendix 8.1 LVIA Methodology [APP-072]** that was agreed with LCC at the series of workshops as set out in **6.3.8.4 Environmental Statement - Appendix 8.4 Consultation [APP-075].** The cumulative assessment is based on the additional changes caused by the Scheme in combination with other similar developments. This includes schemes with planning consent and schemes that are subject of a validated planning application that has not yet been determined. As set out within the Cumulative Assessment Methodology this includes three other solar projects; Cottam Solar Project; Gate Burton Energy Park and Tillbridge Solar. The Cumulative Assessment identifies there to be an Adverse impact on the following landscape receptors:

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		• RLCT 3a Floodplain Valleys (Construction: Negligible Adverse – Not Significant). • BLCA LCT Trent Washlands (individual Policy Zones TWPZ21, TWPZ22, TWPZ23, TWPZ24 and TWPZ48) (Construction: Negligible Adverse – Not Significant). • Land Use (Construction: Minor Adverse – Not Significant). • Nationally and Locally Designated Landscape (construction, operation (year 1 and year 15) and decommissioning: Negligible Adverse – Not Significant). More detail is provided within **6.3.8.2 Environmental Statement - Appendix 8.2 Assessment of Potential Landscape Effects [APP-073], 6.3.8.3 Environmental Statement - Appendix 8.3 Assessment of Potential Visual Effects [APP-074] and within the Supplementary Landscape Effect Tables [REP1-058] and the Supplementary Visual Effects Tables [REP1-059]**. 5. The Cumulative Assessment has been undertaken in accordance with PINS Advice Note 17: Cumulative effects assessment relevant to nationally significant infrastructure projects. A Long List of Sites for Potential Consideration was prepared and set out in **ES Appendix 2.3: Cumulative Assessment Sites [APP-069]**.The Applicant is considering the information which is in the public domain regarding Stow Park Solar Farm and is considering the extent to which any updates are required to the Report on Interrelationship with Other National Infrastructure Projects **[REP2-010]**, or any other examination documents."

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2.6 Ecology and Biodiversity		
WLDC 8.1.1	WLDC raise the following points arising from the review of the Ecology and Biodiversity chapter of the ES: 1. The assessment does not appear to include any consideration of combustion emissions from on-site plant or transport to the site. 2. Scoping Opinion, item ID 2.2.1 indicates that the applicant should include decommissioning of West Burton A in the ES cumulative assessment, but this does not seem to be included in Chapter 9 Section 9.9. 3. Chapter 9 paragraph 9.7.5-9.7.20: Neutral conclusion noted but consider whether there is a risk of significant impacts on the LWS designations adjacent to the site boundary. 4. Chapter 9 para 9.9.19: 'However, there is the potential for increased temporary, but medium/long-term fragmentation or disturbance effects on species like bats, badgers, hedgehogs, reptiles, amphibians and harvest mice which utilise field margins especially.' This sentence is unclear, more description is required as to whether a cumulative significant effect could result. 5. Pins Advice Note 10: Habitats Regulations Assessment relevant to nationally significant	The Applicant responds to the following matters raised regarding the Ecology and Biodiversity EIA for the Scheme: 1. Air quality impacts are assessed within **WB6.2.17 Environmental Statement Chapter 17: Air Quality [APP-055]** which includes potential impacts on human and ecological receptors where considered necessary. Construction traffic air quality impacts were scoped out of this assessment (please see issue 3.15.1 of the **EIA Scoping Opinion [APP-068])**. Furthermore, provisions contained within **WB7.1_B Outline Construction Environmental Management Plan Revision B [EN010132/EX3/WB7.1_B]** and **WB6.3.14.2_B Construction Traffic Management Plan Revision B [EN010132/EX3/WB6.3.14.2_B** will manage construction effects on air quality to an acceptable level. 2. The Scoping Opinion states that [with added emphasis]: "The ES should include West Burton A decommissioning in the cumulative assessment where there is potential for likely significant effects." Plans and projects brought forward for consideration within the Applicant's cumulative assessment of ecological effects were those which were considered to be within the Zone of Influence of the Scheme, namely Tillbridge Solar Project, Gate Burton Energy Park, West Burton Solar Project and the Shared Cable Corridor element of the last three projects and the Scheme. As such, the decommissioning of West Burton A was not deemed to be within the ZoI of the Scheme and therefore was not assessed, as it was

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	infrastructure projects contains a list of information that Applicants should provide. There are elements missing from the Habitats Regulations Report submitted as part of this Scheme. 6. ISHRA para 3.4.2 - In the Planning Inspectorate Scoping Opinion for this project, item ID 2.2.1 indicates that the applicant should include decommissioning of West Burton A in the ES cumulative assessment. It should also be included in the HRA in-combination assessment and considered in Section 5. 7. ISHRA para 4.1.1 Is misleading in respect to Ramsar sites. There is the potential for the Ramsar Sites to have been overlooked by this assessment. 8. The Applicant recognises that 'Much of the biodiversity value which it is anticipated will develop in the preceding (approximately) forty years would be lost along with habitat for a variety of other species'. This suggests that the return to agricultural land is a negative impact and therefore it is questioned whether the agricultural land will be reinstated.	considered that there was no potential for likely significant effects. This decision was taken since the decommissioning work would not be expected to impact significant areas of habitats or ecological features for which there would be a functional linkage to the Scheme, or a functional linkage to the other considered projects when assessed in combination. 3. The process of finalising the Cable Route Corridor has meant that none of the LWSs will be directly affected by the cable installation. This is ensured by avoiding crossing/making incursions into the LWSs when siting either the trench(es), access routes, compounds or jointing bays and adopting a suitably wide buffer (e.g. >30m) where there is a lack of physical barriers (hedgerows or roads). The **7.17 Outline Ecological Protection and Mitigation Strategy [APP-326]** provides precautionary measures to ensure potential indirect pollution or dust deposition effects from the cable installation works in proximity to these sites are mitigated. Key to this will be the establishment of strict traffic, personnel and plant movement routes, designated refuelling/washing areas, presence of an Ecological Clerk of Works to monitor the sites and working activities, and restrictions on working in excessively wet or dry conditions in proximity to these sites. As set out in **WB6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047]** the proposed embedded mitigation, incorporating sensitive buffering, protection and supervision of works adjacent to and in proximity to the LWSs, together with the habitat remediation commitments as contained within the **WB7.3_B Outline Landscape and Ecological Management Plan Revision B [EN010132/EX3/WB7.3_B]** is considered to reduce the overall

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		severity to result in a neutral residual effect during the construction phase. 4. The sentence in question describes how the duration of the Shared Cable Route installation could affect the duration of the temporary impacts upon the listed hedgerow/field margin species. In either case, no significant cumulative effect on these species is considered likely, however. This is demonstrated by the absence of such cumulative impacts identified in the ecology sections of **WB6.2.23_A ES Chapter 23 Summary of Significant Effects Revision B [EN010132/EX3/WB6.2.23_B]** and Appendix E of **WB8.1.9_B Joint Report on Interrelationships between Nationally Significant Infrastructure Projects Revision B [REP2-010]**). 5. The **WB7.18_A - Information to Support a Habitat Regulations Assessment (the 'ISHRA') [EN010132/EX3/WB7.18_A]** contains all the necessary information to determine that there would be no conceivable effect on any European site and its qualifying features as a result of the Scheme, in accordance with PINS Advice Note 10. If there is any specific information that WLDC considers missing from the ISHRA, the Applicant asks WLDC to specify this so the Applicant can consider the assertion in more detail. 6. The decommissioning of West Burton A was not considered to lie within the Zone of Influence of the Scheme owing principally to the lack of significant, functionally linked habitats/ecological features between the Scheme and West Burton A. Furthermore, as it is concluded that significant cumulative effects from all considered projects upon the Humber Estuary SAC & SPA (and Ramsar site, see point 7 below) are not likely, there is therefore no significant

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		cumulative effect likely to arise from the decommissioning of West Burton A in combination with the considered projects. 7. The **WB7.18_A - Information to Support a Habitat Regulations Assessment (the 'ISHRA') [EN010132/EX3/WB7.18_A]** has been updated to include an assessment of the potential for significant effects on the Humber Estuary Ramsar Site. 8. A Decommissioning Plan will be prepared in accordance with the **7.2 Outline Decommissioning Statement [APP-310]** which is secured by Requirement 21 in Schedule 2 of **3.1_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C]**.
WLDC 8.12	WLDC has identified no positive impacts during construction.	The Applicant acknowledges this comment.
WLDC 8.13	WLDC has identified the following neutral impacts during construction: "*Construction activities could lead to a small amount of noise and possibly light disturbance to the species within the woodland. However, this would be temporary and would only affect the margins of the woodland. It should be noted that a certain amount of noise disturbance, dust deposition and run off would be anticipated as a result of routine agricultural activities, and as such impacts are likely to be similar to the current baseline conditions.*"	The Applicant acknowledges that this comment is extracted from Paragraph 9.7.31 of **WB6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047]**.
WLDC 8.14	WLDC has identified the following negative impacts during construction: 1. Fields N6, N8 (West Burton 2) and Q11 (West Burton 3) each contain individual mature in-field trees which could be at risk of fragmentation and	The Applicant responds to the following matters raised regarding the Ecology and Biodiversity EIA for the Scheme: 1. The Applicant acknowledges that this comment is extracted from Paragraph 9.7.41 of **WB6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047]**.The mature in-field trees mentioned will not be

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	degradation impacts from being surrounded by the array structures for the life of the Scheme, reducing their wildlife value. 2. The loss of 60-142m of largely species-poor hedgerow network due to temporary cabling operations is likely to constitute an adverse residual effect significant at a Site level in the medium term given that it would take approximately 3-5 years for the full re-establishment of re-planted hedgerows. 3. Accidental damage or pollution events during construction could degrade the hedgerow and watercourse network and woodland edges leading to localised, temporary adverse reductions in habitat quality for foraging bats. 4. The proximity of all Local Wildlife Sites means they are susceptible to short to medium-term degradation impacts arising from possible discharge/deposition of sediments, dust and contaminants. 5. Accidental damage to the Codder Lane Belt woodland during the laying of this track and trenching could occur from movement of plant or vehicle over-run. 6. Without the creation of the protective buffer zones, arable field margins would stand to be lost to some,	surrounded by the array and will be re-connected to existing hedgerows through proposed native shelter belt / woodland planting as shown in **6.4.8.18.2_A Environmental Statement - Figure 8.18.2 - Landscape and Ecology Mitigation and Enhancement Measures - West Burton 2 [REP1-028]** and **6.4.8.18.3_A Environmental Statement - Figure 8.18.3 - Landscape and Ecology Mitigation and Enhancement Measures - West Burton 3 [REP1-029]**. 2. The Applicant acknowledges that this comment is extracted from Paragraph 9.7.53 of **WB6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047]**.The potential for likely significant effects on ecology resulting from the cable installation works have been identified and described within Section 9.5 of **6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047]**, with extensive mitigation measures identified (in Section 9.6 and 9.7) to minimise these effects. These mitigation measures are further outlined in the **7.17 Outline Ecological Protection and Mitigation Strategy [APP-326]** – particularly Section 2.4, Section 6 and Section 11. It is acknowledged that, due to the length of the cable route corridor, some adverse short to medium term impacts on the hedgerows and associated drainage ditches will occur in order to facilitate the trenching works. However, use of Horizontal Directional Drilling techniques will ensure that all impacts upon hedgerows, trees and watercourses assessed to be of elevated ecological importance (streams, rivers, species-rich and ecologically important hedgerows and mature trees) will be avoided entirely. This will be secured through the implementation of the final **Ecological Protection and Mitigation Strategy [APP-326]** together with **7.15 Crossing Schedule [APP-324]** which details the location of all features to be crossed using HDD. A detailed Ecological

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	potentially significant, degree during the clearance of the Sites and construction of the arrays. 7. Barriers to movement in the form of severed or blocked/culverted watercourses and linear natural features may cause population fragmentation. 8. The small number of new permanent access gaps at ditches would potentially cause a minor, long-term adverse effect on otter and water vole dispersal should newly crossed ditches be rendered inaccessible at these locations. 9. Accidental pollution events would potentially have a detrimental effect on the quality of habitats on Site and downstream beyond the Site in the short to medium term depending on severity. 10. Otters and water voles may be impacted through direct harm (to animals or their burrows) or disturbance during any construction activity affecting boundary habitats (ditches, watercourses and associated adjacent scrub, hedgerows or woodland). 11. Cable installation works will also require the incursion into approximately 20 ditches which has the potential to cause direct harm to water voles and otters, including their burrows and resting places, should they be present.	Protection and Mitigation Strategy is secured via Requirement 8 of **3.1_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C]**. It is therefore only the remaining species-poor and intensively managed hedgerows which stand to be directly impacted by open cut trenching. These removed sections will be relatively short (approximately up to 6.5m each). In addition, cabling works are temporary and progressive meaning that restoration and replanting will follow once works in each section is complete. Residual impacts on these hedgerows have been assessed as being adverse in the short and medium term (significant at Site level only), and neutral in the long term. Please note that Hedgerow Removal Plans will be submitted at Deadline 2 and appended to the LEMP, which will show the indicative temporary hedgerow removals required for the installation of the cable route. The Applicant has also produced Hedgerow Removal Plans providing indicative details of the hedgerows that are currently proposed to be removed temporarily to facilitate the construction of the Scheme and those that are currently proposed to be removed for the operational life of the Scheme. These plans are appended to the **WB7.3_B Outline Landscape and Ecological Management Plan Revision B [EN010132/EX3/WB7.3_B]**. The final Landscape and Ecological Management Plan, that is secured through Requirement 7 of Schedule 2 to the DCO, will set out the final details for hedgerow removal and will be approved by the relevant planning authority (or authorities). 3. The Applicant acknowledges that this comment is extracted from Paragraph 9.7.90 of **WB6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047]**. As set out in **6.2.9 ES Chapter 9 Ecology and Biodiversity**

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	12. Riparian habitat quality (particularly rivers, streams and larger ditches) is at risk of degradation through pollution resulting from run-off, sediment/dust deposition and contamination. 13. Harvest mice stand to be adversely affected by the loss of arable crop within which to make nests and forage. The impact of habitat loss would be felt for the life of the Scheme and potentially be of moderate to high severity. 14. Nesting birds are considered likely to be displaced to a significant, if not complete, degree owing to the imposition of tall structures and other hardware into the arable fields. Yellow wagtail may stand to be displaced the least as they are believed to be able to nest in taller habitats and tolerate shorter sightlines. Displacement can be expected to last for the duration of the Scheme and would likely lead to local population fragmentation and increased intra-specific pressures on surrounding arable and grassland habitat which may be at, or approaching, carrying capacity. 15. Impacts on overwintering birds depends on the timing of construction activities. It is assumed that, with a c.24-month build programme, working over the winter months will be unavoidable. Consequently, there remains the risk that flocks of wading birds such as golden plover and lapwing will	**[APP-047]** the adoption of development free buffers at field boundaries from the onset of construction (protective fencing) and through the operational lifespan of the Scheme will reduce the potential for accidental damage or pollution events. Fencing is detailed within the **WB7.1_B Outline Construction Environmental Management Plan Revision B [EN010132/EX3/WB7.1_B]** (which is secured through requirement 13 of Schedule 2 to the **3.1_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C]**), The buffers will ensure the retention of uncultivated field margins and woodland edges. The **7.17 Outline Ecological Protection and Mitigation Strategy [APP-326]** sets out the protocols to be followed during the cable installation works, including during the clearance of hedgerow, ditch and other field boundary habitat to open trenches. This will comprise the presence of an ECoW, as well as the translocation or replanting of all temporarily removed hedgerow habitat, and re-seeding of other habitat, its aftercare and monitoring. A detailed Ecological Protection and Mitigation Strategy is secured via Requirement 8 of **3.1_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C]**. 4. The Applicant acknowledges that this comment is extracted from Paragraph 9.7.12 of **WB6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047]**. The **7.17 Outline Ecological Protection and Mitigation Strategy [APP-326]** provides precautionary measures to ensure potential indirect pollution or dust deposition effects from the cable installation works in proximity to these sites are mitigated. Key to this will be the establishment of strict traffic, personnel and plant movement routes, designated refuelling/washing areas, presence of an Ecological Clerk of Works to monitor the sites and working

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	be dissuaded from areas of the Sites or Cable Route Corridor they might ordinarily use on an occasional basis for foraging and shelter. 16. Aquatic invertebrates associated with rivers such as the Till and Trent may be further impacted through sediment mobilisation during horizontal directional drilling activities. 17. Badgers may be adversely impacted by the proposed development through loss of habitat in which to build setts, accidental direct harm during construction, disturbance by vehicles and personnel or the compaction of soil around setts.	activities, and restrictions on working in excessively wet or dry conditions in proximity to these sites. As set out in **WB6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047]** the proposed embedded mitigation, incorporating sensitive buffering, protection and supervision of works in proximity to the LWSs, together with the habitat remediation commitments as contained within the **WB7.3_B Outline Landscape and Ecological Management Plan Revision B [EN010132/EX3/WB7.3_B]**, is considered to reduce the overall severity to result in a neutral residual effect during the construction phase. The Ecological Protection and Mitigation Strategy is secured via Requirement 8 of **3.1_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C]**. 5. The Applicant acknowledges that this comment is extracted from Paragraph 9.7.29 of **WB6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047]**. In one location at West Burton 2, underground cabling and the route of a construction and maintenance access track is proposed to cross the woodland known as the Codder Lane Belt by utilising an existing agricultural access gap. The gap presently measures approximately 6m, and only up to 3m is required for the track. While no fragmentation effects are anticipated, it is possible that accidental damage to the woodland during the laying of this track and trenching could occur from movement of plant or vehicle over-run. The **7.17 Outline Ecological Protection and Mitigation Strategy [APP-326]** will require that all track creation and cable laying work will be undertaken under the supervision of an Ecological Clerk of Works to ensure no harm to the woodland results. The formalisation of the track, together with its width as a moderate proportion of the overall exiting gap width will mean that the risk of

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		operational damage to the woodland will be low. A detailed Ecological Protection and Mitigation Strategy is secured via Requirement 8 of **3.1_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C]**. 6. The Applicant acknowledges that this comment is extracted from Paragraph 9.7.54 of **WB6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047]**. Substantial development-free buffer zones at all field boundaries protected by fencing (to measure between 5 and 20+m depending on habitat value) will be set up prior to the onset of construction activities in accordance with prescriptions set out in the **7.17 Outline Ecological Protection and Mitigation Strategy [APP-326]**. The locations and widths of all buffer zones are illustrated in Appendix 9.11 of Chapter 9 of the Environmental Statement **[EN010132/APP/WB6.3.9.11].** These zones, which almost universally measure wider than current arable field margins, will be retained and managed throughout the duration of the Scheme and result in a significant net gain in the coverage of marginal grassland habitats. 7. The Applicant acknowledges that this comment is extracted from Paragraph 9.7.110 of **WB6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047]** and is in relation to potential construction phase impacts on otters and water voles. Mitigation measures are provided within Sections 9.7.112 – 9.7.116 of **WB6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047]** to ensure that construction phase residual effects upon otters and water voles are reduced, such that the potential effects are considered to be neutral and not significant.

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		8. The Applicant acknowledges that this comment is extracted from Paragraph 9.7.110 of **WB6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047]** and is in relation to potential construction phase impacts on otters and water voles. Mitigation measures are provided within Sections 9.7.112 – 9.7.116 of **WB6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047]** to ensure that construction phase residual effects upon otters and water voles are reduced, such that the potential effects are considered to be neutral and not significant. 9. The Applicant acknowledges that this comment is extracted from Paragraph 9.7.66 of **WB6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047]** and is in relation to potential construction phase impacts on ditches. Mitigation measures are provided within Sections 9.7.71 – 9.7.74 of **WB6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047]** to ensure that construction phase residual effects upon ditches are reduced, such that the potential effects are considered to be neutral and not significant. The protective measures are secured within Method Statement 3 of the **7.17 Outline Ecological Protection and Mitigation Strategy [APP-326]**. 10. The Applicant acknowledges that this comment is extracted from Paragraph 9.7.107 of **WB6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047]** and is in relation to potential construction phase impacts on otters and water voles. Mitigation measures are provided within Sections 9.7.112 – 9.7.116 of **WB6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047]** to ensure that construction phase residual effects upon otters and water voles are reduced, such that the potential effects are considered to be neutral and not significant. The protective measures are secured within Method

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		Statement 5 of the **7.17 Outline Ecological Protection and Mitigation Strategy [APP-326]**. 11. The Applicant acknowledges that this comment is extracted from Paragraph 9.7.108 of **WB6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047]** and is in relation to potential construction phase impacts on otters and water voles. Mitigation measures are provided within Sections 9.7.112 – 9.7.116 of **WB6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047]** to ensure that construction phase residual effects upon otters and water voles are reduced, such that the potential effects are considered to be neutral and not significant. The protective measures are secured within Method Statement 6 of the **7.17 Outline Ecological Protection and Mitigation Strategy [APP-326]**. 12. The Applicant acknowledges that this comment is extracted from Paragraph 9.7.109 of **WB6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047]** and is in relation to potential construction phase impacts on otters and water voles. Mitigation measures are provided within Sections 9.7.112 – 9.7.116 of **WB6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047]** to ensure that construction phase residual effects upon otters and water voles are reduced, such that the potential effects are considered to be neutral and not significant. The protective measures are secured within Method Statement 3 of the **7.17 Outline Ecological Protection and Mitigation Strategy [APP-326]**. 13. The Applicant acknowledges that this comment is extracted from Paragraph 9.7.121 of **WB6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047].** Adverse residual effects on harvest mice in

LIR Ref.	Summary	Applicant's Response
		the construction phase are considered likely to be significant at Local level. However, these are expected to reduce to Site level in the operational phase due to the partial replacement of lost suitable habitat with substantial tussocky and tall grassland within the majority of the Sites within wide buffer zones, and cessation of intensive arable practices. 14. The Applicant acknowledges that this comment is extracted from Paragraph 9.7.146 of **WB6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047].** For all species, nest avoidance procedures during the construction phase set out in the **7.17 Outline Ecological Protection and Mitigation Strategy [APP-326]** will ensure that direct impacts on birds and their nests will be minimised to neutral levels. A detailed Ecological Protection and Mitigation Strategy is secured via Requirement 8 of **3.1_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C]**. 15. The Applicant acknowledges that this comment is extracted from Paragraph 9.7.178 of **WB6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047].** The **7.17 Outline Ecological Protection and Mitigation Strategy [APP-326]** details how work during the winter months will seek to minimise potential impacts on flocks of overwintering birds. This will involve the construction (including cabling) site management following a regime where undeveloped fields are not entered by plant or personnel unless it can be confirmed that they do not contain flocks of waders or wildfowl such as geese or plovers, so as to avoid unnecessary energy expenditure at a sensitive time of year. A detailed Ecological Protection and

LIR Ref.	Summary	Applicant's Response
		Mitigation Strategy is secured via Requirement 8 of **3.1_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C]**. 16. The Applicant acknowledges that this comment is extracted from Paragraph 9.7.187 of **WB6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047].** The **7.17 Outline Ecological Protection and Mitigation Strategy [APP-326]** provides precautionary working methods surrounding the installation of the cables and the minimisation of risks associated with horizontal directional drilling. This would include visual monitoring for discharge of sediments (and deployment of silt traps or cessation of works where necessary), monitoring for vibrations, suitable depth settings and precautionary siting of entry and exit pits. Taking into account the habitat protection measures in the oEPMS, and appropriate habitat reinstatement measures for cabling works, residual effects on invertebrates are likely to be able to be reduced to neutral, non significant levels in the construction phase. A detailed Ecological Protection and Mitigation Strategy is secured via Requirement 8 of **3.1_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C]**. 17. The Applicant acknowledges that this comment is extracted from Paragraph 9.7.202 of **WB6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047].** With the implementation of the buffer zones and embedded mitigation measures as contained within the **7.17 Outline Ecological Protection and Mitigation Strategy [APP-326]**, effects on badgers are expected to be neutral during the construction phase. A detailed Ecological Protection and Mitigation

LIR Ref.	Summary	Applicant's Response
		Strategy is secured via Requirement 8 of **3.1_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C]**.
WLDC 8.32 to 8.36	WLDC has identified the following positive impacts during operation: 1. Water quality within field boundary ditches can be expected to significantly increase post development. The cessation of agricultural practices is likely to lead to an improvement in the water quality within retained ponds. 2. Benefits from the increased capacity of the newly sown and managed grasslands and other herb-rich habitats to support flying invertebrates compared to arable. 3. The cessation of intensive arable farming practices (particularly insecticide spraying) and reversion of the land to permanent (for at least the duration of the array) grassland can be expected to result in increased diversity and abundance of invertebrates at the operational Site. 4. For lapwing in the operational phase, the mitigation proposed is considered to be sufficient to reduce adverse effects to neutral levels, with a reasonably high potential to bring about at least a beneficial effect which could be significant at a Local level, or higher, considering the area of habitat proposed to receive this management.	The Applicant notes that this comment reflects the assessment provided in **WB6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047]**.

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	5. The realisation of the positive aspects is dependent upon the securing of robust management plans and collaborative implementation of solar projects.	
WLDC 8.37 to 8.38	WLDC has identified the following neutral impacts during operation: 1. Operational impacts are expected to be minimal as vehicle movements will be infrequent and limited, with no need to enter watercourses or ditches. 2. Impacts on polecat, hedgehog and harvest mouse, reptiles and amphibians during the operation of the Scheme are likely to be minimal. 3. The opportunity for impacts from pollution or run off is highly limited. 4. The predominance of large, open intensive arable fields, managed boundary features, and general absence of woodland and open water is very much reflected in the surrounding landscape, with large wetland or woodland sites being many kilometres away. These characteristics of the Sites substantially reduce the risk that any as-yet unknown adverse impacts upon bats from a large scale solar development would cause a significant conservation impact on the conservation status of populations of bats at a Local scale or above.	The Applicant notes that this comment reflects the assessment provided in **WB6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047]**.

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WLDC 8.42 to 8.47	WLDC has identified the following negative impacts during operation: 1. While arable field margin habitat within the retained buffer zones and patches of semi-improved grassland would benefit from cessation of agricultural inputs and sprays, they would be at risk of long-term degradation through eventual succession to scrub without periodic management. 2. There is a risk that ponds may become damaged should sheep be utilized for grazing post construction. Sheep may poach pond habitats causing damage to the adjacent vegetation and increased suspended sediment content of the water. 3. While individual foraging curlew were recorded on occasion, no breeding could be confirmed, or was considered likely. In the event that a territory is indeed present on Site, it would likely be displaced in the same manner. 4. In the absence of more recent or major studies into the effects of solar installation on bat behaviour or populations, it is prudent to assess the potential impacts of solar developments on bats in the context of the Sites' habitats, landscape setting and survey results. The Sites' generally low suitability to bats and low habitat diversity is borne out by the dominance of common and widespread species	The Applicant responds to the following matters raised regarding the Ecology and Biodiversity EIA for the Scheme: 1. The Applicant acknowledges that this comment is extracted from Paragraph 9.7.58 of **WB6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047].** Management prescriptions within the **WB7.3_B Outline Landscape and Ecological Management Plan [EN010132/EX3/7.3_B]** focus on the creation and maintenance of a range of valuable grassland habitats within buffers, including tussocky grassland and wildflower or pollinator meadows, each of which will have different cutting and maintenance requirements. The **7.17 Outline Ecological Protection and Mitigation Strategy [APP-326]** and **WB7.3_B Outline Landscape and Ecological Management Plan Revision B [EN010132/EX3/WB7.3_B]** will ensure the implementation of the buffers at the onset of construction, and longevity/value thereafter. The production, approval and implementation of these two management plans is secured via requirements 8 and 7 respectively in Schedule 2 to the **3.1_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C].** 2. The Applicant acknowledges that this comment is extracted from Paragraph 9.7.79 of **WB6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047].** The **WB7.3_B Outline Landscape and Ecological Management Plan Revision B [EN010132/EX3/WB7.3_B]** contains grassland, buffer and pond-edge habitat management measures with the aim of maximising the biodiversity value of the retained ponds, including minimising the risk of poaching by livestock. A detailed Landscape and Ecological Management Plan is secured via

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	within the survey and desk study data. The rarer species of barbastelle bat and Nathusius' pipistrelle appear within the data at extremely low rates (less than 0.23% of calls and less than 0.05% of calls respectively), reflecting both the wide-ranging, migratory behaviour of Nathusius' pipistrelle and the relatively high survey effort (1,254 recording nights at 16 deployment locations) which increases detection probability for a given species. The predominance of large, open intensive arable fields, managed boundary features, and general absence of woodland and open water is very much reflected in the surrounding landscape, with large wetland or woodland sites being many kilometres away. Taken together, these characteristics of the Sites substantially reduce the risk that any as-yet unknown adverse impacts upon bats from a large-scale solar development would cause a significant conservation impact on the conservation status of populations of bats at a Local scale or above. 5. The operation of the arrays would mean that the majority of the Sites are effectively removed as an option for foraging and shelter for flocks of most species of waders during the winter. 6. For grey partridge in the operational phase, it is predicted that nesting will continue to occur within the Site for the most part and that the enhanced boundary habitats (with a greater abundance of	Requirement 7 of **3.1_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C]**. 3. The Applicant acknowledges that this comment is extracted from Paragraph 9.7.151 of **WB6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047].** For curlew, in the event that a territory does exist on Site, the wetland bird habitat creation set out in the **WB7.3_B Outline Landscape and Ecological Management Plan Revision B [EN010132/EX3/WB7.3_B],** as secured via requirement 7 of the draft DCO, has been designed to provide sufficient mitigation of suitable habitat. 4. The Applicant acknowledges that this comment is extracted from Paragraph 9.7.94 of **WB6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047]** and is in relation to potential operational phase impacts on bats. Operationally, residual effects on bats are expected to be neutral owing to the implementation of buffer zones and the distances maintained between vehicle movements and the key habitats for bats. In the medium to long term, the extensive habitat enhancement measures, centring around the reversion of arable to more diverse grasslands, with the addition of higher ecological grassland types within buffers and easement, the planting and favourable management of hedgerows, trees and creation of new ponds can be expected to bring about improvements for bats. The above habitat enhancement measures are set out in Section 4 of the **WB7.3_B Outline Landscape and Ecological Management Plan Revision B [EN010132/EX3/WB7.3_B],** as secured via requirement 7 of the draft DCO, and are likely to have a beneficial effect on bats, which is significant at a District level.

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	weedy, seed-bearing vegetation), together with the presence of permanent short grassland within the mosaic of habitat management under the array will reduce displacement of these birds to adverse levels, significant at a Local scale.	5. The Applicant acknowledges that this comment is extracted from Paragraph 9.7.180 of **WB6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047].** Work to seed and create the 97ha of wetland bird mitigation habitat and set aside bird mitigation habitat will commence as a priority within the construction programme to ensure that the Scheme contains habitat suitable for foraging flocks of waders and other wintering birds such as thrushes. Although created predominantly for breeding ground nesting birds, this mitigation habitat will also be of increased value to foraging overwintering birds over and above baseline levels in that they can be expected to contain more soil invertebrates and naturally-dropped seed than that of the neighbouring intensive arable land. It is not proposed for any specific mitigation for the removal of the Site from the overall expanse of foraging habitat (for flocking waders, thrushes and waterfowl) within the local landscape, although this impact is not considered to be large considering the very large extent of suitable land in the local landscape. Consequently, the provision of a proportion of mitigation habitat suitable for flocks of foraging wintering birds during the operational phase is considered to reduce residual adverse habitat loss effects such that they will be significant only at a Site level. 6. The Applicant acknowledges that this comment is extracted from Paragraph 9.7.166 of **WB6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047]** and reflects the assessment made within ES Chapter 9**.**
WLDC 8.49	WLDC has identified the following positive impacts during decommissioning: "*the ES concludes that the restoration of the land back to open arable farmland would likely be beneficial*	The Applicant notes that this comment reflects the assessment provided in **WB6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047]**.

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	for some species of farmland bird which require open sightlines, as well as for plant species associated with arable margins. There is no certainty at this stage that this positive benefit would be realised however, and would depend on a robust decommissioning strategy that is not yet known."	
WLDC 8.50	WLDC has identified the following neutral impacts during decommissioning: "*depending on the ecological value of the habitats that develop over the lifespan of the scheme, it is realistic that certain areas of the site may be retained due to their value for wildlife on decommissioning."*	The Applicant notes that this comment reflects the assessment provided in **WB6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047]**.
WLDC 8.51 to 8.53	WLDC has identified the following negative impacts during decommissioning: 1. *"Much of the biodiversity value which it is anticipated will develop in the preceding (approximately) forty years would be lost along with habitat for a variety of other species. In order to revert back to arable food production, it may be necessary to enhance the nutrient content of the soil if it has been depleted, which would likely be achieved through treatment with fertilisers, although it is believed that this is highly unlikely and an increase in soil fertility is likely to arise.* 2. *An increase in the use of pesticides and herbicides would also be expected. The decision on the farming type to be used will be made by the landowner prior to decommissioning.*	The Applicant responds to the following matters raised regarding the Ecology and Biodiversity EIA for the Scheme: 1. The Applicant acknowledges that this comment is extracted from Paragraph 9.8.2 of **WB6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047]** and reflects the assessment provided in **WB6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047]**. 2. The Applicant acknowledges that this comment is extracted from Paragraph 9.8.2 of **WB6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047].** A Decommissioning Plan will be prepared in accordance with the **Outline Decommissioning Statement [APP-310]** which is secured by Requirement 21 in Schedule 2 of **WB3.1_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C]**. This will ensure the potential decommissioning impacts are minimised. The Applicant does note, however, that once the decommissioning of the Scheme is complete, the Applicant is not anticipated to retain any control over how the land is used.

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	3. *Based upon current (2022) legislative protection, protected species which could be directly impacted by decommissioning activities would include badgers, water vole, otter, great crested newts, reptiles (grass snake) and breeding birds. Further surveys to identify the use of the site by these receptors would therefore also be expected as a minimum."*	3. The Applicant acknowledges that this comment is extracted from Paragraph 9.8.5 of **WB6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047].** Paragraph 9.8.4 **of 6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-044]** states that no more than twelve months prior to decommissioning commencing, the Site will be visited by an appropriately qualified ecologist to identify any ecological constraints arising from decommissioning activities. This requirement is set out in the **Outline Decommissioning Statement [APP-310]** which is secured by Requirement 21 in Schedule 2 of **WB3.1_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C]**. Further surveys, mitigation and/or compensatory measures may then be required in line with prevailing guidance. As a minimum, an extended Phase 1 Habitat survey (or equivalent) is considered likely to be required to identify the potential presence of protected species and important habitats. Any mitigation measures undertaken at the point of decommissioning aimed at maintaining ecological value of the Scheme Sites should take account of changes in ecological objectives that have occurred over the lifespan of the Scheme. In particular, changes in ecological conditions both on the Sites and on a national scale as a result of climate change may result in new ecological objectives that cannot at the current time be reasonably foreseen.
WLDC 8.54	WLDC has identified the following neutral impacts with other solar projects: the management of land beneath panels may give rise to positive habitat creation.	The Applicant notes that this comment reflects the assessment provided in **WB6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047]**.
WLDC 8.55 to 8.57	WLDC has identified the following positive impacts with other solar projects:	The Applicant notes that this comment reflects the assessment provided in **WB6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047]**.

LIR Ref.	Summary	Applicant's Response
	1. As the designated sites which were at risk of significant impacts from the Scheme were located substantially distant from the other three solar proposals, no cumulative impacts were considered likely to occur. 2. It is presumed that buffer zones protecting marginal habitats will be instigated in all cases. Furthermore, as residual effects from the Scheme on valued habitats are neutral, it is considered unlikely that an elevation to an adverse effect would occur in combination with these projects. 3. Given the predicted neutral to minor beneficial effects of the Scheme, as well as Cottam Solar Project, on polecat, hedgehog and brown hare species, and the likelihood that hedgerow habitats will be preserved within all projects, no cumulative adverse effects are anticipated.	
WLDC 8.58 to 8.64	WLDC has identified the following negative impacts with other solar projects: 1. Each project might cause its own adverse effects individually from potentially damaging activities such as tree, building or hedgerow removal, or night-time lighting (unclear at this stage from review of available documents). 2. As the three projects are highly likely to replace the arable habitats with grassland, there is the potential	The Applicant responds to the following matters raised regarding the Ecology and Biodiversity EIA for the Scheme: 1. The cumulative effects assessment is set out within Section 9.9 of the **6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047]**. The Applicant acknowledges that this comment is extracted from Paragraph 9.9.5 of **6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047]**. 2. The cumulative effects assessment is set out within Section 9.9 of the **6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047]**. The

LIR Ref.	Summary	Applicant's Response
	for a cumulative impact on harvest mice which typically rely on tall, tussocky grassland as well as arable crops. Depending on the degree of marginal habitat retention and tussocky grassland creation, a minor cumulative adverse effect operating at a Local or District scale may be caused by the combination of all three projects with the Scheme. 3. Ground nesting birds are likely to be affected through displacement by each of the proposed projects given the incompatibility of solar hardware with the necessary long, unbroken sightlines required by these species for predator avoidance when nesting. The degree of adverse impact depends on the level of mitigation each Scheme is able to provide. 4. As flocks of many overwintering bird species rely on open habitats when foraging, it is unlikely that impacts on these species will be neutral or beneficial at the three projects, in the event that these species occur at them. Consequently, given their proximity to the Scheme, a cumulative adverse effect at Local scale is possible resulting from the loss of the combined developed area from the local foraging and sheltering habitat resource. 5. Cumulative adverse effects during construction are also possible for hedgerows, trees, ditches and watercourses within the shared cable route	Applicant acknowledges that this comment is extracted from Paragraph 9.9.9 of **6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047].** 3. The cumulative effects assessment is set out within Section 9.9 of the **6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047]**. The Applicant acknowledges that this comment is extracted from Paragraph 9.9.11 of **6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047]**. 4. The cumulative effects assessment is set out within Section 9.9 of the **6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047]**. The Applicant acknowledges that this comment is extracted from Paragraph 9.9.12 of **6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047]**. 5. The cumulative effects assessment is set out within Section 9.9 of the **6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047]** and **8.1.9 Joint Report on Interrelationships between Nationally Significant Infrastructure Projects [REP1-057].** 6. The cumulative effects assessment is set out within Section 9.9 of the **6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047].** The Applicant acknowledges that this comment is extracted from Paragraph 9.9.17 of **6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047]**.

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	(depending on final designs, methods, routing and duration/sequence). 6. A sequential programme over five years would be expected to give rise to a cumulative adverse effect, due to the need for the compounds, jointing bays, haul routes etc to remain in place for five years. the sequential programme would have greatest impact on hedgerow habitat, followed by grasslands including semi-improved grassland and lowland floodplain grassland.	
NCC 7.1 and 7.2	Potential for impacts on the following local wildlife sites (LWS): • North Leys Road (ditch), Coates LWS (5/3492) • Coates Wetland LWS (2/416) *"Impacts ion these sites must be avoided, or if that is genuinely not possible, then appropriate mitigation and/or compensation put in place. There will presumably also be impacts on undesignated habitats including hedges, ditches and verges, and again the mitigation hierarchy should be followed, and losses kept to a minimum."*	Neither North Leys Road (ditch), Coates LWS C or Coates Wetland LWS will be directly affected by the works as is described within Section 9.7.5 – 9.7.20. The process of finalising the Cable Route Corridor has meant that none of the LWSs will be directly affected by the cable installation. This is ensured by avoiding crossing/making incursions into the LWSs when siting either the trench(es), access routes, compounds or jointing bays and adopting a suitably wide buffer (e.g. >30m) where there is a lack of physical barriers (hedgerows or roads).The **7.17 Outline Ecological Protection and Mitigation Strategy [APP-326]** provides precautionary measures to ensure potential indirect pollution or dust deposition effects from the cable installation works in proximity to these sites are mitigated. Key to this will be the establishment of strict traffic, personnel and plant movement routes, designated refuelling/washing areas, presence of an Ecological Clerk of Works to monitor the sites and working activities, and restrictions on working in excessively wet or dry conditions in proximity to these sites. As set out in **WB6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047]** the proposed embedded mitigation, incorporating sensitive buffering, protection and supervision of works in proximity to the LWSs, together with the habitat

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		remediation commitments as contained within the **WB7.3_B Outline Landscape and Ecological Management Plan Revision B [EN010132/EX3/WB7.3_B]**, is considered to reduce the overall severity to result in a neutral residual effect during the construction phase. A detailed Ecological Protection and Mitigation Strategy is secured via Requirement 8 of **3.1_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C]**.
2.7	**General Matters (Including DCO)**	
NCC 6.1 NCC 6.5 NCC 6.7	*"The West Burton A site has been selected by the UK Atomic Energy Authority (UKAEA) as a base for the development of the UK's first Nuclear Fusion Plan.* *It is understood that the promoters of the West Burton Solar Project have not yet met with representatives of UKAEA to discuss the respective projects. The County Council is concerned that there should be adequate and proper liaison between the two projects.* *It is imperative that any proposed cable route for the West Burton Solar Project does not sterilise development land or detract from future development plans and we wish to see effective arrangements built into the DCO , such as a pre commencement requirement, to ensure appropriate consultation with EDF, UK AEA and the relevant local authorities over the final cable routeing to ensure this is achieved."*	Please see the Applicant's response to First Written Question 1.1.23 in the **Applicant's Response to the First Written Questions [EN010132/EX3/WB8.1.21]**.

LIR Ref.	Summary	Applicant's Response
2.8 Glint and Glare		
WLDC 18.1	WLDC raise the following issues with the Glint and Glare chapter of the ES: 1. It should be noted that the assessment method does not consider effects on visual receptors currently such as protected views and public rights of Way (PRoW). 2. Third party vegetation should be excluded as it is not owned or controlled by the applicant. 3. Residential receptors should be considered for both ground floor and 1st floor rooms. 4. Local roads should also be modelled as there are more road traffic accidents (RTAs) 5. Train driver height must be confirmed. 6. The strategy of additional vegetation screening mentioned and temporary screening does not define the species of the vegetation which we would expect to be dense and coniferous in nature.	1. Section 9.3 of **6.3.16.1 ES Appendix 16.1 Solar Photovoltaic Glint and Glare Study [APP-132]**) has considered effects on users of PRoW. Any effects on observers using a PRoW or at visual receptor points will have a low magnitude. The reflection intensity is similar for solar panels and still water (and significantly less than reflections from glass and steel) which is frequently a feature of the outdoor environment surrounding public rights of way. Therefore, the reflections are likely to be comparable to those from common outdoor sources whilst navigating the natural and built environment on a regular basis. 2. It is standard practice to rely on third party vegetation when assessing glint and glare. 3. Visibility from top floors including residential properties has been taken into consideration where appropriate. Impacts upon observers located on the ground floor, which is typically the main living space, have a greater significance with respect to residential amenity (see section 7.1 of **6.3.16.1 ES Appendix 16.1 Solar Photovoltaic Glint and Glare Study [APP-132]**). 4. The traffic density of local roads is low and the speed at which traffic will be travelling is low. Therefore, a low magnitude of effects is predicted at worst within Section 5.3 of **6.3.16.1 ES Appendix 16.1 Solar Photovoltaic Glint and Glare Study [APP-132]**) and detailed modelling is not required. 5. The height of the train driver is detailed within Section 5.4.2 of **6.3.16.1 ES Appendix 16.1 Solar Photovoltaic Glint and Glare Study [APP-132].** 6. The use of coniferous vegetation is considered incongruous and contrary to best practice. Native vegetation has been included within the scheme to

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		lead to an overall enhancement and strengthening of the character of the area, whilst providing the necessary mitigation requirements. The Outline Landscape and Ecological Management Plan (OLEMP) [**EN0101032/EX3/WB7.3_B]** follows industry best practice and sets out a framework for the planting, management and monitoring of landscaping and ecological mitigation and enhancement habitats for the Scheme. Para 4.3.5 sets out that all tree/hedgerow specimens will be native and of UK provenance; trees will be locally sourced and of local provenance where possible. Table 4.1 and Table 4.2 sets out hedgerow and tree species for planting within the Scheme.
WLDC 18.4 WLDC 18.5 WLDC 18.6	WLDC has identified no positive, no neutral and no negative impacts during construction and decommissioning.	The Applicant notes that this comment reflects the assessment provided in Paragraphs 16.7.7 to 16.7.8 of **WB6.2.16 ES Chapter 16 Glint and Glare [APP-054]**.
WLDC 18.7	WLDC has identified no positive impacts during operation.	The Applicant notes that this comment reflects the assessment provided in Paragraphs 16.13.1 to 16.13.6 of **WB6.2.16 ES Chapter 16 Glint and Glare [APP-054]**.
WLDC 18.8	WLDC identify the following neutral impact during operation: *"A neutral effect is predicted towards train driver receptors along the 4km of identified railway track for a fixed mounting system and tracking mounting system."*	The Applicant notes that this comment reflects the assessment provided in Paragraph 16.8.2 of **WB6.2.16 ES Chapter 16 Glint and Glare [APP-054]**.

LIR Ref.	Summary	Applicant's Response
WLDC 18.9 to 18.13	WLDC identify the following negative impacts during operation: 1. *"A Moderate Adverse effect is predicted for one dwelling (if a fixed mounting system is implemented) or two dwellings (if a tracking mounting system is implemented).* 2. *A Moderate Adverse effect is predicted for a section of 300m along Sturton Road (if a fixed or tracking mounting system is implemented).* 3. *Minor/Negligible Adverse effects are predicted in respect of aviation receptors. The assessment relating to all other receptors has concluded that the worst case scenario effects will likely be Minor/Negligible Adverse (for either the fixed or tracker options).* 4. *The Applicant has proposed embedded mitigation in the form of vegetation and, if required, additional interim mitigation in the form of opaque fencing, to significantly reduce the visibility of the reflective area from those receptors which are predicted to experience a Moderate Adverse impact. For tracker panels, backtracking the panels to redirect the glint and glare away from receptors is also a mitigation option.* 5. *Once this mitigation is in place and obstructs the reflecting panels from view, dwelling receptors would be subject to a maximum impact of Minor/Negligible Magnitude which would result in a Minor/Negligible*	The Applicant notes that this comment reflects the assessment provided in Sections 16.8, 16.9 and 16.12 of **WB6.2.16 ES Chapter 16 Glint and Glare [APP-054]**.

LIR Ref.	Summary	Applicant's Response
	Adverse Significance of Effect, which is Not Significant in EIA terms. Likewise, with mitigation in place, road receptors would be subject to a maximum impact of Minor/Negligible Magnitude which would result in a Minor/Negligible Adverse Significance of Effect, which is Not Significant in EIA terms."	
WLDC 18.14 to 18.17	WLDC identify the following cumulative impacts during operation: 1. *"These proposed solar developments are sufficiently close to the Scheme to share some of the receptors identified and assessed in the Glint and Glare Study (Doc. Ref. EN010132/APP/WB6.3.16.1).* 2. *Gate Burton Energy Park and Cottam are sufficiently close (within 2km from the Scheme) to West Burton to share multiple receptors.* 3. *Shared receptors are unlikely to have visibility of multiple reflective areas (West Burton, Gate Burton Energy Park and Cottam), and no significant impact is predicted due to the presence of significant mitigating factors.* 4. *West Burton 2 and West Burton 3 have shared receptors; the assessment has concluded that one dwelling can have some visibility of both Sites and the relevant reflective areas. However, the existing and the proposed screening is likely to significantly reduce the*	The Applicant notes that this comment reflects the assessment provided in Sections 16.10 and 16.11 of **WB6.2.16 ES Chapter 9 Glint and Glare [APP-054]**.

LIR Ref.	Summary	Applicant's Response
	visibility of both sites and therefore overall Minor/Negligible Adverse impact is predicted."	
2.9	**Ground Conditions and Contamination**	
WLDC 16.1	WLDC raise the following issues with the Ground Conditions and Contamination chapter of the ES: *"The construction period could result in of potential contaminant linkages from contaminated soils to human receptors, controlled waters and to the built environment."*	The final Construction Environmental Management Plan (CEMP) will clearly set out best practice construction techniques to ensure any environmental impacts are as limited as possible during the construction period. An Outline Construction Environmental Management Plan (OCEMP) has been submitted as part of the DCO application in which Table 3.11 details mitigation measures to be implemented to reduce the risk to identified receptors (**WB7.1_B Outline Construction Environmental Management Plan Revision B [EN010132/EX3/WB7.1_B]**).
WLDC 16.6 WLDC 16.7	WLDC has identified no positive and no neutral impacts during construction, operation, and decommissioning.	The Applicant's position aligns with WLDC's comments.
WLDC 16.8 to 16.10	WLDC has identified the following negative impacts during construction, operation, and decommissioning: 1. *"The ES identifies the risk of potential contaminant linkages from contaminated soils to human receptors (construction workers, adjacent site users or residents, and future site users), controlled waters (underlying aquifers and surface waters) and to the built environment. The ES identifies that there are a number of surface water features both on and adjacent to the Scheme, however, limited potential sources of contamination have been identified across the mainly agricultural land use.*	The Applicant's position aligns with WLDC's comments.

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	2. *Small areas of potentially infilled ponds/Made Ground have been identified across the Scheme, however, given the small scale of these features and the age of any infill material, the potential for gas generation is low. Furthermore, the potential for hazardous ground gases to accumulate within confined spaces is considered very low. In addition, no buildings are proposed in the vicinity of potentially infilled ponds/pits across the Sites, breaking the contaminant linkage to the built environment.* 3. *During construction, operation and decommissioning, standard industry best practice measures would be adopted to avoid and reduce the risk to ground conditions. The Construction Environmental Management Plan (CEMP) [EN010133/APP/C7.16] will clearly set out best practice to ensure any environmental impacts are as limited as possible. With embedded mitigation and the implementation of well-established good industry practices for managing contaminated land which will be incorporated into the CEMP, it is considered that the potential effects of contamination or risk of contamination will be reduced to moderate/minor and would not be significant."*	
WLDC 16.11	WLDC identify the following cumulative impacts: *"Given modern methods of construction and the low sensitivity end use, the cumulative effects to human health or controlled waters are considered to be negligible with the implementation*	The Applicant responds to the following matter raised by WLDC relating to Ground Conditions and Contamination effects during the construction, operation and decommissioning phases of the Scheme.

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	of embedded mitigation measures such as the CEMP which would be appropriate for all development projects."	The Applicant acknowledges that this comment is extracted from Paragraph 11.11.3 of **WB6.2.11 ES Chapter 11: Ground Conditions and Contamination [APP-049]**.
2.10 Hydrology, Flood Risk and Drainage		
WLDC 15.1	WLDC raise the following issues with the Hydrology, Flood Risk and Drainage chapter of the ES: *"There are several impacts on the water environment as a result of the Scheme. This includes potential increased flood risk, pollution from surface water runoff, increased water volume discharge (including highway run-off/spillage risk) and inappropriate wastewater disposal, among others."*	The potential impacts on the water environment during construction, operation and decommissioning are considered in **WB6.2.10 ES Chapter 10: Hydrology Flood Risk and Drainage [APP-048]**. As concluded in paragraph 10.11.1, with the embedded design measures described within the Chapter and those within **WB7.1_B Outline Construction Environmental Management Plan Revision B [EN010132/EX3/WB7.1_B]** (which is secured through requirement 13 of Schedule 2 to the **3.1_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C]**), all identified potential effects have been assessed as being of negligible significance, and therefore not significant for the purposes of the of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.
WLDC 15.9 WLDC 15.10	WLDC has identified no positive and no neutral impacts during construction and decommissioning.	The Applicant acknowledges these comments.
WLDC 15.11 to 15.17	WLDC has identified the following negative impacts during construction and decommissioning: 1. *"There is the potential for mud and debris arising from the construction / decommissioning works to enter the existing surface water / land drainage system, causing*	The Applicant responds to the following matters raised by WLDC relating to Hydrology, Flood Risk and Drainage effects during the construction and decommissioning phases of the Scheme:

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	blockages and restricting flow. This could result in localised flooding on site. 2. *Temporary increase in impermeable area during construction / decommissioning has the potential to increase flooding both on and off site.* 3. *Construction of access tracks and movement of construction / decommissioning traffic, in the absence of construction good practice, can lead to compaction of the soil.* 4. *There are a number of activities which have the potential to negatively affect the local water environment.* 5. *Fuel, hydraulic fluids, solvents, grouts, paints and detergents and other potentially polluting substances will be stored and / or used on the Site. Leaks and spillages of these substances could pollute groundwater bodies through infiltration as well as the surface watercourses within the Site and those nearby if their use is not carefully controlled and spillages enter existing flow pathways.* 6. *The sensitivity of surface water to inappropriate wastewater disposal from welfare facilities is considered to be Medium. Construction / Decommissioning foul water will not be discharged into a watercourse under any circumstances and therefore the magnitude of impact and significance of this effect*	1. The Applicant acknowledges that this comment is extracted from Paragraph 10.6.2 of **WB6.2.10 ES Chapter 10: Hydrology, Flood Risk and Drainage [APP-048]**. 2. The Applicant acknowledges that this comment is extracted from Paragraph 10.6.4 of **WB6.2.10 ES Chapter 10: Hydrology, Flood Risk and Drainage [APP-048]**. 3. The Applicant acknowledges that this comment is extracted from Paragraph 10.6.6 of **WB6.2.10 ES Chapter 10: Hydrology, Flood Risk and Drainage [APP-048]**. 4. The Applicant acknowledges that this comment is extracted from Paragraph 10.6.10 of **WB6.2.10 ES Chapter 10: Hydrology, Flood Risk and Drainage [APP-048]**. 5. The Applicant acknowledges that this comment is extracted from Paragraph 10.6.13 of **WB6.2.10 ES Chapter 10: Hydrology, Flood Risk and Drainage [APP-048]**. 6. The Applicant acknowledges that this comment is extracted from Paragraphs 10.6.14 and 10.6.16 of **WB6.2.10 ES Chapter 10: Hydrology, Flood Risk and Drainage [APP-048]**. 7. The Applicant acknowledges that this comment is extracted from Paragraph 10.8.2 of **WB6.2.10 ES Chapter 10: Hydrology, Flood Risk and Drainage [APP-048]**. The Applicant reiterates that the identified adverse impacts during the construction and decommissioning phases will be mitigated through the implementation of an approved **7.1_B Outline Construction**

LIR Ref.	Summary	Applicant's Response
	is considered to be Negligible. Following implementation of the proposed mitigation the residual effect is considered to be Negligible. 7. *Following implementation of the proposed mitigation the residual effect is considered to be Negligible for all negative impacts."*	**Environmental Management Plan Revision B [EN010132/EX3/WB7.1_B]** (CEMP). The Scheme, through the **3.1_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C]**, provides (in Requirement 13 of Schedule 2) that "No part of the authorised development may commence until a construction environmental management plan for that part has been submitted to and approved by the relevant planning authority or, where the part falls within the administrative areas of multiple relevant planning authorities, each of the relevant planning authorities". It further provides that "The construction environmental management plan must be substantially in accordance with the outline construction environmental management plan."
WLDC 15.18 WLDC 15.19	WLDC has identified no positive and no neutral impacts during operation.	The Applicant acknowledges these comments.
WLDC 15.20 to 15.29	WLDC has identified the following negative impacts during operation: 1. *The increase in permanent impermeable area on the Site will be negligible, however equipment such as the proposed substations and energy storage areas will generate increased surface water runoff when compared to the current use of the Site. This could potentially increase localised pluvial flooding on the Site, as well as increase flood risk to people and property in the immediate surrounding area and downstream.*	The Applicant responds to the following matters raised by WLDC relating to Hydrology, Flood Risk and Drainage effects during the construction and decommissioning phases of the Scheme: 1. The Applicant acknowledges that this comment is extracted from Paragraph 10.6.17 of **WB6.2.10 ES Chapter 10: Hydrology, Flood Risk and Drainage [APP-048]**. 2. The Applicant acknowledges that this comment is extracted from Paragraph 10.6.19 of **WB6.2.10 ES Chapter 10: Hydrology, Flood Risk and Drainage [APP-048]**. 3. The Applicant acknowledges that this comment is extracted from Paragraph 10.6.22 of **WB6.2.10 ES Chapter 10: Hydrology, Flood Risk and Drainage [APP-048]**.

LIR Ref.	Summary	Applicant's Response
	2. *An increase in the volume of water discharged to local watercourses has the potential to increase the flood risk to areas downstream of the Scheme.* 3. *The sensitivity of construction workers and equipment to mud and debris blockages is considered to be Medium. The potential for mud and debris to block drainage networks is considered to have an effect of Low Adverse magnitude on flooding to the Site itself and surrounding area which would result in flood risk to construction workers and equipment at the Site.* 4. *Urban runoff from the Site, along with the associated infrastructure, could contain diffuse urban pollutants such as hydrocarbons, heavy metals, and nutrients as well as debris and silt which could ultimately be discharged to the nearby watercourses via surface water runoff or infiltrate to ground. Without mitigation this could have a moderate adverse effect on water quality.* 5. *Given the nature of the Scheme there is a potential risk of fire which may negatively affect the local water environment. Runoff from the Site, along with the associated infrastructure, following a fire could contain diffuse urban pollutants such as hydrocarbons, heavy metals, as well as debris and silt which could ultimately be discharged to the nearby watercourses via surface water runoff or infiltrate to ground.*	4. The Applicant acknowledges that this comment is extracted from Paragraph 10.6.24 of **WB6.2.10 ES Chapter 10: Hydrology, Flood Risk and Drainage [APP-048]**. 5. The Applicant acknowledges that this comment is extracted from Paragraph 10.6.26 of **WB6.2.10 ES Chapter 10: Hydrology, Flood Risk and Drainage [APP-048]**. 6. The Applicant acknowledges that this comment is extracted from Paragraph 10.6.28 of **WB6.2.10 ES Chapter 10: Hydrology, Flood Risk and Drainage [APP-048]**. 7. The Applicant acknowledges that this comment is extracted from Paragraph 10.6.30 of **WB6.2.10 ES Chapter 10: Hydrology, Flood Risk and Drainage [APP-048]**. 8. The Applicant acknowledges that this comment is extracted from Paragraph 10.6.32 of **WB6.2.10 ES Chapter 10: Hydrology, Flood Risk and Drainage [APP-048]**. 9. The Applicant acknowledges that this comment is extracted from Paragraph 10.6.34 of **WB6.2.10 ES Chapter 10: Hydrology, Flood Risk and Drainage [APP-048]**. 10. The Applicant acknowledges that this comment is extracted from Paragraph 10.8.2 of **WB6.2.10 ES Chapter 10: Hydrology, Flood Risk and Drainage [APP-048]**.

LIR Ref.	Summary	Applicant's Response
	6. *Traffic on existing roads to and from the Site will increase albeit negligibly as a result of the Scheme. Any increase in traffic flows could lead to the introduction of new sources (or changed discharges) of highway runoff into receiving watercourses. Surface water runoff from roads can contain pollutants such as hydrocarbons, heavy metals and inert particulates which can cause chronic pollution of the water environment if allowed to enter watercourses without the appropriate treatment.* 7. *Spillages of pollutants (e.g. oil) on highways can be transported to watercourses via runoff, where they could impact upon ecological life, or infiltrate to ground.* 8. *Due to the nature of the Scheme there is no demand for water. This is not directly considered to be a surface water quality effect, as it is unlikely that any required water would be sourced from local surface waters, and it is presumed that the Scheme would not proceed unless potable water was available from elsewhere. Water consumption for any future Site users should be minimised through water efficiency measures.* 9. *Access to the solar PV array during construction and operation will be taken from grassed/permeable tracks and existing farm tracks accessed from the wider highway network, limiting the requirement for new hardstanding. Currently there is no existing foul*	

LIR Ref.	Summary	Applicant's Response
	network on the Site or adjacent. Welfare facilities such as toilets and basic washing stations are limited to the substation located in West Burton 3. Wastewater associated with the welfare facilities at the substation will be contained in a septic tank which will be emptied as and when required by tanker. No direct connection to public sewers is proposed. Following implementation of the proposed mitigation the residual effect is considered to be Negligible. 10. *Following implementation of the proposed mitigation the residual effect is considered to be Negligible for all negative impacts.*	
WLDC 15.30 to 15.31	WLDC has identified the following cumulative impacts: 1. *"There is potential for overlap between construction of adjacent schemes and construction of this Scheme. Thus, there is the potential for short term, temporary construction related pollutants generated from both the Scheme and adjacent developments to impact on watercourses in the study area. However, provided that standard and good practice mitigation is implemented on the construction sites through their respective CEMPs and as per the conditions of the relevant planning permission, environmental permits and licences, as is being proposed for this Scheme, the cumulative risk can be effectively managed and there would not be a significant increase in the risks to any waterbodies.*	The Applicant responds to the following matters raised by WLDC relating to cumulative Hydrology, Flood Risk and Drainage effects : 1. The Applicant acknowledges that this comment is extracted from Paragraph 10.10.3 of **WB6.2.10 ES Chapter 10: Hydrology, Flood Risk and Drainage [APP-048]**. 2. The Applicant acknowledges that this comment is extracted from Paragraph 10.10.4 and of **WB6.2.10 ES Chapter 10: Hydrology, Flood Risk and Drainage [APP-048]**.

LIR Ref.	Summary	Applicant's Response
	2. *The Scheme will be designed to ensure there is no long-term deterioration in water quality or increase in flooding. Attenuation and treatment will be provided where necessary for runoff from the Scheme prior to discharge to waterbodies or ground. As such, provided that all the mitigation measures are implemented for all schemes, then the cumulative impacts from the Scheme and any cumulative schemes are not anticipated to produce any significant effects during operation."*	
LCC 10.16 LCC 10.17 LCC 10.18	LCC as the Local Lead Flooding Authority concludes that: 1. The surface water Flood Risk is appropriately addressed at this outline stage in the ES; and suitable mitigation measures proposed in the CEMP. 2. The surface water drainage strategy is appropriate for the development and can be subject of a requirement for the details. 3. The dDCO includes appropriate requirements requiring detailed design approval of access, parking, construction traffic management, drainage to be approved by the relevant planning authority prior to commencement. 4. The Surface Water Flood Risk is also appropriately addressed at this outline stage. The energy storage facility (BESS) may create a large impermeable area	The Applicant acknowledges and agrees with these comments.

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	and drainage details in accordance with SUDs principle would be needed for this. 5. *In summary, subject to the development being carried out as proposed within the DCO application documents and further details being agreed as part of subsequent DCO Requirements, the Council as Lead Local Flood Authority for Lincolnshire, is of the view that impacts of this proposal would be neutral.*	
2.11 Landscape and Visual Impact		
WLDC 7.1.1	WLDC raise the following issues with the Landscape and Visual Assessment and methodology: 1. The ZTV models use DTM supplemented with separately derived site data rather than DSM so there is potential for error. 2. The cumulative developments section only deals with other solar farms and not other developments in the area. 3. The consideration of the separate parts of the West Burton scheme in the cumulative assessment is inappropriate – the elements should be considered as one scheme. 4. It appears that residential receptors are only assessed within the 1km study area but the figures show a 2km study area and this should be clarified.	The Applicant acknowledges these comments and responds to each point in turn: 1. The ZTV Methodology was undertaken in accordance with **6.3.8.1 Environmental Statement - Appendix 8.1 LVIA Methodology [APP-072]** that was agreed with LCC at the series of workshops as set out in **6.3.8.4 Environmental Statement - Appendix 8.4 Consultation [APP-075].** 2. The cumulative effects assessment was undertaken in accordance with **6.3.8.1 Environmental Statement - Appendix 8.1 LVIA Methodology [APP-072]** that was agreed with LCC at the series of workshops as set out in **6.3.8.4 Environmental Statement - Appendix 8.4 Consultation [APP-075].** The cumulative effects assessment is based on the additional changes caused by the Scheme in combination with other similar developments. This includes schemes with planning consent and schemes that are subject of a validated planning application that has not yet been determined. As set out within the cumulative effects assessment

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	5. In paragraph 8.7.47 the Applicant considers there would be 'limited, temporary and short-term adverse impacts' on the Regional Landscape Character Type 4a 'Unwooded Vales' which appears to ignore the likely significant adverse impact on character that would be experienced during construction and during the first 15 years of operation (which are defined by the Applicant as 'Long-term' in Table 8.50. Splitting the assessment down to the different parts of the project understates the wider impact of the project on this Regional Landscape Character Area. West Burton 2 and 3 are also within this landscape character area and would also have an adverse impact on Regional Landscape Character Area 4a 'Unwooded Vales'. The existing character of this area is that of an open agricultural landscape which affords long-distance views. The presence of solar panels and associated infrastructure will change this character and introduce industrial elements into what is currently a rural agricultural landscape. When combined with the other solar schemes proposed (Cottam and Tillbridge in particular) the cumulative impact on Regional Landscape Character Area 4a Unwooded Vales will be even more significant. 6. It should be noted that the proposed mitigation of linear woodland and screen planting will take a significant time to establish and would have an	methodology this includes three other solar projects; Cottam Solar Project; Gate Burton Energy Park and Tillbridge Solar. 3. The Applicant respectfully disagrees with this statement. The cumulative effects assessment was undertaken in accordance with **6.3.8.1 Environmental Statement - Appendix 8.1 LVIA Methodology [APP-072]** that was agreed with LCC at the series of workshops as set out in **6.3.8.4 Environmental Statement - Appendix 8.4 Consultation [APP-075]**, which considers the West Burton scheme in its entirety as against the other 3 cumulative solar projects: Cottam Solar Project; Gate Burton Energy Park and Tillbridge Solar. 4. The Study Area for Residential Receptors was agreed with LCC at the series of workshops as set out in 6.3.8.4 Environmental Statement - Appendix 8.4 Consultation [APP-075]. There are four Study Areas that are considered in detail in the assessment process. These four Study Areas extend to a 5km, 2km and 1km radius from the boundary of each Site and 0.5km buffer from the boundary of the Cable Route Corridor which runs between each of the Sites. For the clarity of Figure 8.1 [APP-164], and with the aim of stopping the drawing from becoming too cluttered, it is only the extent of the 5km, 2km and 0.5km Study Areas which are shown. **5.** Paragraph 8.7.47 of the LVIA **[APP-046]** sets out the effects identified at the construction stage associated with West Burton 1 on RLCT 4a Unwooded Vales, as set out within Table 8.50 of the **LVIA [APP-046]** and in more detail within **6.3.8.2 Environmental Statement - Appendix 8.2 Assessment of Potential Landscape Effects [APP-073].** The In-combination landscape and visual effects relating to the

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	adverse impact on landscape character by changing the existing open nature of the landscape and shortening views. The Applicant claims there is a Significant Moderate Beneficial impact on this Regional Landscape Character Area from Year 15 when the proposed mitigation planting becomes established. Although planting may largely screen views, there would still be an adverse impact on the 4a Unwooded Vale Regional Landscape Character Area, as character will have changed from an open, agricultural landscape to a closed, wooded character area with significant industrial elements. 7. The Applicant assesses that there will be a beneficial cumulative impact on landscape character. This assessment is based on West Burton being constructed and in operation alongside the mitigation provided for the Cottam, Gate Burton and Tillbridge solar schemes during operation. However, at paragraph 18.7.116 of the Socio-economic chapter of the ES (Doc. Ref. EN010133/APP/WB6.2.18) states that the Scheme will "have a long-term impact on the landscape character of some tourism and recreation receptors that are reliant on the landscape context for their value, such as viewpoints, landmarks, and cultural heritage assets". This contradicts the findings in the LVIA.	Cumulative Sites have been considered as part of the cumulative effects assessment at Chapter 8.9 of the LVIA. In combination effects relating to West Burton 1, 2 and 3 are considered within the Cumulative Sites assessment in accordance with **6.3.8.1 Environmental Statement - Appendix 8.1 LVIA Methodology [APP-072]** that was agreed with LCC at the series of workshops as set out in **6.3.8.4 Environmental Statement - Appendix 8.4 Consultation [APP-075].** *6.* In-Combination landscape effects are addressed within the **LVIA [APP-046]** within Chapter 8.9. In regard to RLCT 4a Unwooded Vales, the LVIA states at paragraph 8.9.12: *"The In-combination effects upon LCA – 4a Unwooded Vales of the West Burton Sites is Minor Neutral (Not Significant) at year 1 of operation and Minor Beneficial (Not Significant) at year 15 with primary and secondary mitigation. There would be the introduction of new elements and features associated with the arrays within the character area. However, there would not be the removal of or changes in individual elements or features of the landscape within the character area and with the substantial landscape mitigation planting that would occur as a consequence of the development, the RLCT Profile: 4a: Unwooded Vales landscape character type is able to absorb these cumulative Sites whilst maintaining the integrity of the character of this area. The substantial amount of new planting and ecological enhancements resulting in overall beneficial effects to the wider character of the area."* 7. The Applicant respectfully disagrees with this statement. The LVIA does not at any point state a beneficial cumulative impact on landscape character. **Section 8.10 of the LVIA [APP-046]** assesses

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	• In addition to the above, the Gate Burton scheme has assessed a cumulative moderate adverse impact based on the same schemes. It is unclear how the Applicant has reached their conclusion, particularly as the landscape receptors are subdivided and an overall impact on the landscape does not appear to be forthcoming. • It is not understood how an argument can be made that the construction of an extensive solar farm will lead to an 'improvement' in local or regional landscape character, when this involves the introduction of significant industrial elements (panels, substations and related infrastructure – security fencing/lighting etc). The assessment does not address the negative impact to landscape character that would occur from the introduction of these industrial elements ('detractors' when considering regional and local landscape character). 8. Para 8.9.55 of the Landscape and Visual Impact Assessment Chapter states that the Combined Effects of three Site Areas that there 'are no likely significant in-combination landscape effects at the construction, operation (year 1 and year 15) and	the potential cumulative landscape and visual effects resulting from incremental changes caused by other past, present or reasonable foreseeable changes resulting from other local developments, together with the Scheme. The cumulative effects assessment was undertaken in accordance with **6.3.8.1 Environmental Statement - Appendix 8.1 LVIA Methodology [APP-072]** that was agreed with LCC at the series of workshops as set out in **6.3.8.4 Environmental Statement - Appendix 8.4 Consultation [APP-075].** For further details on the cumulative landscape effects of the Cumulative Developments, please refer to the Individual Landscape Receptor Sheets contained within **Appendix 6.3.8.2 Environmental Statement - Appendix 8.2 Assessment of Potential Landscape Effects [APP - 073]. A summary is provided within section 8.10 of the LVIA.** In respect of WLDC's comment regarding a discrepancy between the LVIA and Chapter 18 of the Environmental Statement, the Applicant refers the party to the response to First Written Question 1.13.8 in the **Applicant's Response to the First Written Questions [EN010132/EX3/WB8.1.21]**. 8. The effects of each individual Site are assessed individually within the Identification and Evaluation of Likely Significant Effects section (Chapter 8.7) of the LVIA. The in-combination assessment (Chapter 8.9) must be read in conjunction with this, and does not repeat the conclusions of the individual assessments, otherwise this would lead to a double counting of effects. Paragraph 8.9.55 of the **LVIA [APP-046]** directly addresses the in-combination effects of the 3 site areas upon Ancient Woodland and Natural Designations. This section assesses the in-combination landscape effects resulting from the combination of individual effects at the 3 individual Sites and the 3

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	decommissioning stages'. It is questioned how during the construction stage of the combined sites or during the 15-year establishment phase (which is not short-term) there no likely significant effects. The Applicant has identified that there will be significant adverse effects on viewpoints, transport receptors and PRoW receptors during construction. Planting trees to screen the proposed scheme will not prevent a significant adverse change in landscape character. 9. Having regard to the criteria that forms Policy S53, WLDC concludes that the West Burton Solar Project does not represent an effective and efficient use of land to realise its benefits and as a consequence fails to assimilate itself into the landscape. The Scheme will materially harm the landscape character and results in greater direct impacts on ecological and landscape fabric than could be achieve through a well-designed, contiguous scheme.	individually assessed sections of the Cable Route Corridor. There are no Natural Designations on or within 2km of any of the West Burton Sites or within 0.5km of the Cable Route Corridor. The nearest area of Ancient Woodland is located approximately 1.2km north of the West Burton 3 Site at Gate Burton and separated from the Site by the settlement of Marton, the A1500 and Willingham Road. As such, this assessment of effects is considered robust. 9. The Applicant respectfully disagrees that the division of the site into distinct units, i.e. (West Burton 1, 2 and 3). Section 6.4 of the 7.5 Planning Statement [APP-313] shows that the Scheme has been subject to a detailed and sensitive iterative design process. This has taken account of the context and features of the land within the Order limits, nearby sensitive receptors and assets, information emerging from environmental surveys, feedback from stakeholders, and opportunities and constraints in order to develop a good design that balances the need to maximise the energy generation capacity of the Scheme, with the avoidance and mitigation of impacts, and provision of environmental and other enhancements, where practicable. There is no guarantee that a single site of the same scale would result in fewer impacts than the application scheme. Site Selection Assessment Revision A [AS-004] identified other potential development areas, but none of these scored better than the application site in the RAG assessment that was undertaken (see Section 3 Assessment Results and Annex E: Potential Development Area Proformas). The requirements for cabling and infrastructure for a single site and the resulting impacts would be dependent upon the unique location and context of the that site and the constraints that

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		arise as a result. It is not therefore reasonable to conclude that a single site would obviously be better. Although the Scheme comprises a series of independent areas of land or Sites, they are set within an extensive agricultural landscape. With large areas of land between each of the Sites, each is set apart by their associated features such as robust hedgerows, woodland and tree cover, intervening settlements and the road and rail infrastructure. These independent areas of land provide more scope for the Scheme to be offset from all key receptors such as settlement edges, individual residential properties, PRoW and transport routes which further assist with its integration and dispersion across the landscape than if the Site were one composite whole. The discrete areas of land in the Scheme are placed so that the Scheme would not be perceived in its entirety and the solar panels are distributed 'in and amongst' the landscape features to assimilate them into the landscape. The provision of a solar scheme with discrete areas of land can therefore offer a more favourable approach than having a single large site, as it allows for a distributed and less obtrusive deployment of the solar panels. The presence of the intervening landscape also provides scope for areas of mitigation and the ability to build upon the connectivity of green infrastructure and ecology and nature conservation and retain the existing landscape pattern.
WLDC 7.12	WLDC considers there to be no positive impacts associated with the Scheme during construction and decommissioning.	The In-combination landscape and visual effects relating to the Cumulative Sites (West Burton 1, 2 and 3) have been considered as part of the LVIA **[APP-046]**. In-combination effects are considered within the Cumulative Sites assessment in accordance with **6.3.8.1 Environmental Statement -**

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		Appendix 8.1 LVIA Methodology [APP-072] that was agreed with LCC at the series of workshops as set out in **6.3.8.4 Environmental Statement - Appendix 8.4 Consultation [APP-075].** The In-combination assessment does not identify any feneficial effects associated with the scheme during construction and decommissioning. More detail is provided within **6.3.8.2 Environmental Statement - Appendix 8.2 Assessment of Potential Landscape Effects [APP-073], 6.3.8.3 Environmental Statement - Appendix 8.3 Assessment of Potential Visual Effects [APP-074**] and within the **Supplementary Landscape and Visual Effects Tables [REP1-058 and REP1-059]**.
WLDC 7.13	WLDC considers there to be a neutral impact associated with the Scheme during construction and decommissioning: 1. National Landscape Character Areas: These are not considered further within the LVIA Chapter as the assessment relies on the regional and local landscape character assessment as the baseline and to form judgements. 2. Topography and Watercourses: There would not be the removal of, or changes in individual topography or watercourse elements or features of the landscape as a result of the combined effects of the four Site areas. However, the topography and watercourse features within these areas are influenced by the intensive farming that has diminished the 'sense of place' in parts including the drainage of flood plains and impact on the riparian vegetation and other habitats. Where watercourses	The Applicant notes WLDC's comments in relation to Neutral effects. 1. The Applicant acknowledges that this comment is extracted from Paragraph 8.9.4 of the LVIA **[APP-046].** 2. The Applicant acknowledges that this comment is extracted from Paragraph 8.9.6 of the Cottam Solar Project LVIA, and **not** an extract from the West Burton LVIA **[APP-046].** The In-combination effects of the Cumulative Sites is Negligible Neutral (Not Significant) at the construction, operation (year 1 and year 15) and decommissioning stages. For further details refer to the Individual Landscape Receptor Sheets at Appendix 8.2 [**APP-073].** 3. The Applicant acknowledges that this comment is extracted from Paragraph 8.9.49of the LVIA **[APP-046].** 4. The Applicant acknowledges that this comment is extracted from Paragraph 8.9.56 of the LVIA **[APP-046].**

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	survive, their associated vegetation helps to curtail visibility in this area. Public access is also limited to these features. This aesthetic would not be changed. The difference in effect shows there are very minor patches of in-combination change but that would yield no discernible improvement or deterioration to the existing landscape character of the topography and watercourses. 3. Nationally and Locally Designated Landscapes: The baseline of the AGLVs would not be affected but its wider setting would be improved with the landscape mitigation to yield beneficial effects. The In-combination effects of the Cumulative Sites is Negligible Adverse (Not Significant) at the construction, operation (year 1 and year 15) and decommissioning stages. 4. Combined Effects of the Generating Substations (Landscape): Effects associated with the Substations are included within the assessment of each individual Site. There are no likely significant in-combination landscape effects at the construction, operation (year 1 and year 15) and decommissioning stages.	
WLDC 7.17	WLDC considers there to be the following negative impacts associated with the Scheme during construction and decommissioning:	The Applicant notes WLDC's comments in relation to Adverse effects. 1. The Applicant notes WLDC's comments in relation to Adverse landscape and visual effects. The Applicant respectfully disagrees with WLDCs comments in regard to there being significant adverse

LIR Ref.	Summary	Applicant's Response
	1. Landscape Character: • Significant adverse (negative) impacts on landscape character and visual impacts will occur during construction. • There are also likely to be significant in-combination adverse effects on a regional landscape character (cumulatively) during construction. 2. Land Use: • The in-combination effects of the Cumulative Sites are Minor Adverse during construction. 3. Significant in-combination visual effects are expected during construction at the following viewpoints: • Viewpoint LCC-C – Broxholme Lane/Main Street • Viewpoint VP9 – Brox/196/1; and • Viewpoint VP10 – Brox/196/1 4. Significant in-combination visual effects are expected during construction at the following transport receptors:	impacts on landscape character during construction and decommissioning of the scheme. The LVIA identifies the In-Combination effects of the scheme in Chapter 8.9: **RLCT Profile: 3a Floodplain Valleys:** The RLCT Profile: 3a Floodplain Valleys landscape character area is not considered to form part of the immediate landscape context for any of the West Burton Sites. The separation of the West Burton Sites from this character area results in In-combination effects limited to the Cable Route Corridor (West Burton 3 to West Burton Power Station) with the other Cumulative Sites and Cable Route Corridors. Effects are identified as being Negligible Adverse (Not Significant) at the construction phase of the development and Negligible Neutral (Not Significant) at operation (year 1 and year 15) and decommissioning stages. **RLCT 4a Unwooded Vales:** The In-combination effects upon LCA – 4a Unwooded Vales of the West Burton Sites is Minor Neutral (Not Significant) at year 1 of operation and Minor Beneficial (Not Significant) at year 15 with primary and secondary mitigation. **RLCT 4b Wooded Vales:** The RLCT Profile: 4b: Wooded Vales landscape character area is not considered to form part of the immediate landscape context for any of the West Burton Sites or Cable Route Corridor. **RLCT 6a Limestone Scarps and Dipslopes:** The separation of the West Burton Sites and Cable Route Corridors from this character area results in the in-combination effects upon RLCT 6a: Limestone Scarps and Dipslopes Character Type as being Negligible Neutral (Not

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	• Transport Receptor – T001/Main Street, Broxholme Lane – Road that runs through WB1; and • Transport Receptor – T015/Cowdale Lane – western section near Torksey 5. Significant in-combination visual effects during construction at the following PRoW receptor: • PR008 (Brox/196/1).	Significant) at the construction, operation (year 1 and year 15) and decommissioning stages. **WLLCA LCA 2 Trent Valley:** Overall, the WLLCA LCA Profile: 2 Trent Valley landscape character area is able to accommodate the changes that arise through the construction phase with Minor Adverse effects (Not Significant) to the Site itself and its immediate surroundings. The In-combination Effects of the Cable Route Corridor (West Burton 3 to West Burton Power Station) with the West Burton 3 Site is Negligible Adverse (Not Significant) at the construction phase and Negligible Neutral (Not Significant) at the operation (year 1 and year 15) and decommissioning stages. **WLLCA LCA 3 The Till Vale:** The In-combination effects upon WLLCA LCA Profile: 3 The Till Vale of the West Burton Sites is Minor Neutral (Not Significant) at year 1 of operation and Minor Beneficial (Not Significant) at year 15 with mitigation. **WLLCA LCA 4 The Cliff**: The separation of the West Burton Sites and Cable Route Corridors from this character area results in the in-combination effects upon WLLCA LCA Profile: 4 The Cliff as being Negligible Neutral (Not Significant) at the construction, operation (year 1 and year 15) and decommissioning stages. **BLCA LCT Mid-Nottinghamshire Farmlands (MNPZ 5: Leverton):** MNPZ 5: Leverton is not considered to form part of the immediate landscape context for any of the West Burton Sites. **BLCA LCT Trent Washlands (individual Policy Zones TWPZ21, TWPZ22, TWPZ23, TWPZ24 and TWPZ48):** TWPZ21, TWPZ22, TWPZ23, TWPZ24 and TWPZ48 occupy the arable farmland to the

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		west of the River Trent and are not considered to form part of the immediate landscape context for the West Burton Sites. 2. The Applicant acknowledges that this comment is extracted from Paragraph 8.9.35 of the LVIA **[APP-046].** 3. The Applicant acknowledges that this comment is extracted from Paragraph 8.9.59 of the LVIA **[APP-046]** 4. The Applicant acknowledges that this comment is extracted from Paragraph 8.9.61 of the LVIA **[APP-046].** 5. The Applicant acknowledges that this comment is extracted from Paragraph 8.9.62 of the LVIA **[APP-046].**
WLDC 7.22	WLDC considers there to be no positive impacts associated with the Scheme during the operational phase.	The In-combination landscape and visual effects relating to the Cumulative Sites have been considered as part of the LVIA **[APP-046]**. In-combination effects are considered within the Cumulative Sites assessment in accordance with **6.3.8.1 Environmental Statement - Appendix 8.1 LVIA Methodology [APP-072]** that was agreed with LCC at the series of workshops as set out in **6.3.8.4 Environmental Statement - Appendix 8.4 Consultation [APP-075].** The Applicant respectfully disagrees with WLDC's statement. The In-combination assessment identifies Beneficial Landscape effects associated with the scheme during Operation, (Year 1 and Year 15). More detail is provided within **6.3.8.2 Environmental Statement - Appendix 8.2 Assessment of Potential Landscape Effects [APP-073], 6.3.8.3 Environmental Statement - Appendix 8.3 Assessment of Potential Visual Effects [APP-074] and within the Supplementary Landscape and Visual Effects Tables [REP1-058** and **REP1-059]**

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WLDC 7.23	WLDC considers there to be a neutral impact associated with the Scheme during the operational phase: 1. Topography and Watercourses: the In-combination effects of the Cumulative Sites is Negligible Neutral at operation (year 1 and year 15) stages. 2. Communications and Infrastructure: the In-combination effects of the Cumulative Sites is Negligible Neutral at operation (year 1 and year 15) stages. 3. Public Rights of Way and Access: the In-combination effects of the Cumulative Sites is Negligible Neutral at operation (year 1 and year 15) stages. 4. Ancient Woodland and Natural Designations: the In-combination effects of the Cumulative Sites is Negligible Neutral at operation (year 1 and year 15) stages.	The Applicant notes WLDC's comments in relation to Neutral effects. 1. The Applicant acknowledges that this comment is extracted from Paragraph 8.9.38 of the LVIA **[APP-046].** 2. The Applicant acknowledges that this comment is extracted from Paragraph 8.9.41 of the LVIA **[APP-046].** 3. The Applicant acknowledges that this comment is extracted from Paragraph 8.9.46 of the LVIA **[APP-046].** 4. The Applicant acknowledges that this comment is extracted from Paragraph 8.9.54 of the LVIA **[APP-046].**
WLDC 7.27	WLDC considers there to be the following negative impacts associated with the Scheme during the operational phase: 1. Nationally and Locally Designated Landscape: The baseline of the AGLVs would not be affected but its wider setting would be improved with the landscape mitigation to yield beneficial effects. The In-combination effects of the Cumulative Sites is Negligible Adverse at operation (year 1 and year 15) stage.	The Applicant notes WLDC's comments in relation to Adverse effects. 1. The Applicant acknowledges that this comment is extracted from Paragraph 8.9.49 of the LVIA **[APP-046].** 2. The Applicant respectfully disagrees with WLDCs comments in regard to there being significant adverse impacts on landscape character **RLCT 4a Unwooded Vales:** The In-combination effects upon LCA – 4a Unwooded Vales of the West Burton Sites is Minor Neutral (Not Significant) at year 1 of operation and Minor Beneficial (Not Significant) at year 15 with primary and secondary mitigation.

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	2. Landscape Character: There would be significant adverse impacts on Regional Landscape Character Area 4a Unwooded Vales from the start of operation (Year 1) and beyond. Landscape planting proposed will help to screen and integrate the proposed scheme, but this will take at least 15 years to mature and will not prevent the fundamental change in landscape character caused by the presence of solar arrays and associated infrastructure (which will change the existing open, rural, agricultural landscape to a semi-industrial landscape with urban elements). 3. Significant In-Combination visual effects are expected during operation (Year 1) at the following viewpoints: • Viewpoint LCC-C – Broxholme Lane/Main Street • Viewpoint VP9 – Brox/196/1; and • Viewpoint VP10 – Brox/196/1 4. Significant In-Combination visual effects are expected during operation (Year 1) at the following transport receptors: • Transport Receptor – T001/Main Street, Broxholme Lane – Road that runs through WB1; and	3. The Applicant acknowledges that this comment is extracted from Paragraph 8.9.59 of the LVIA **[APP-046].** 4. The Applicant acknowledges that this comment is extracted from Paragraph 8.9.61 of the LVIA **[APP-046].** 5. The Applicant acknowledges that this comment is extracted from Paragraph 8.9.62 of the LVIA **[APP-046].**

LIR Ref.	Summary	Applicant's Response
	• Transport Receptor – T015/Cowdale Lane – western section near Torksey 5. Significant In-Combination visual effects are expected during operation (Year 1) at the following PRoW receptors: • PR008 (Brox/196/1).	
WLDC 7.33	WLDC does not considers there to be overall positive landscape character or visual effects as a consequence of the cumulative impacts of the projects.	Cumulative landscape and visual effects relating to the Cumulative Developments have been considered at section 8.10 of the LVIA **[APP-046]**. The cumulative effects assessment was undertaken in accordance with **6.3.8.1 Environmental Statement - Appendix 8.1 LVIA Methodology [APP-072]** that was agreed with LCC at the series of workshops as set out in **6.3.8.4 Environmental Statement - Appendix 8.4 Consultation [APP-075]**. The cumulative effects assessment was based on the additional changes caused by the Scheme in combination with other similar developments. This includes schemes with planning consent and schemes that are subject of a validated planning application that has not yet been determined. As set out within the Cumulative Assessment Methodology this includes three other solar projects; Cottam Solar Project; Gate Burton Energy Park and Tillbridge Solar. The Applicant respectfully disagrees with WLDC's conclusion. The Cumulative Assessment of the LVIA does not consider there to be overall beneficial effects on landscape character. The Cumulative Assessment identifies Minor Beneficial Landscape effects to Land Use following the creation and establishment of extensive mixed grassland habitats at year 1 and year 15 of operation. There will be positive changes in land use such as the creation of extensive mixed grassland habitats and enhanced field boundaries that will help reinforce the pattern of the landscape. As the ecological measures

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		mature, woodland, hedgerows, and grassland would increase vegetation cover across an area dominated by large-scale arable farmland. Reversion to grassland, soil improvements, and river enhancements would create a diverse wildlife-rich land use. New vegetation would create a much stronger structure to the landscape, retaining and enhancing the overall character of the area. No cumulative beneficial visual effects are identified. More detail is provided within **6.3.8.2 Environmental Statement - Appendix 8.2 Assessment of Potential Landscape Effects [APP-073], 6.3.8.3 Environmental Statement - Appendix 8.3 Assessment of Potential Visual Effects [APP-074**] and within the **Supplementary Landscape and Visual Effects Tables [REP1-058** and **REP1-059]**
WLDC 7.34	WLDC considers there to be a cumulative neutral impact on the following landscape receptors associated with the proposed solar farms: • Topography • Communications and Infrastructure • Settlements, Industry, Commerce and Leisure • Public Rights of Way and Access	The Applicant notes WLDC's comments in relation to Neutral effects. Cumulative landscape and visual effects relating to the Cumulative Developments have been considered at section 8.10 of the LVIA **[APP-046]**. The cumulative effects assessment was undertaken in accordance with **6.3.8.1 Environmental Statement - Appendix 8.1 LVIA Methodology [APP-072]** that was agreed with LCC at the series of workshops as set out **in 6.3.8.4 Environmental Statement - Appendix 8.4 Consultation [APP-075]**. The cumulative effects assessment was based on the additional changes caused by the Scheme in combination with other similar developments. This includes schemes with planning consent and schemes that are subject of a validated planning application that has not yet been determined. As set out within the Cumulative Assessment Methodology this includes three other

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	• Scheduled Monuments, Listed Buildings, Conservation Areas and Registered Parks and Gardens	solar projects; Cottam Solar Project; Gate Burton Energy Park and Tillbridge Solar. The cumulative effects assessment identifies there to be a neutral impact on the following landscape receptors: • RLCT 3a Floodplain Valleys (Operation (Year 1 and Year15) and decommissioning) • RLCT 4a Unwooded Vales (construction, operation (year 1 and year 15) and decommissioning) • RLCT 4b Wooded Vales (construction, operation (year 1 and year 15) and decommissioning) • RLCT 6a Limestone Scarps and Dipslopes (construction, operation (year 1 and year 15) and decommissioning) • WLLCA LCA 2 Trent Valley (construction, operation (year 1 and year 15) and decommissioning) • WLLCA LCA 3 The Till Vale (construction, operation (year 1 and year 15) and decommissioning) • WLLCA LCA 4 The Cliff (construction, operation (year 1 and year 15) and decommissioning) • BLCA LCT Trent Washlands (individual Policy Zones TWPZ21, TWPZ22, TWPZ23, TWPZ24 and TWPZ48) (Operation (Year 1 and Year15) and decommissioning) • Land Use (decommissioning) • Topography and Watercourses (construction, operation (year 1 and year 15) and decommissioning) • Communications and Infrastructure (construction, operation (year 1 and year 15) and decommissioning)

LIR Ref.	Summary	Applicant's Response
		• Settlements, Industry, Commerce and Leisure (construction, operation (year 1 and year 15) and decommissioning) • Public Rights of Way and Access (construction, operation (year 1 and year 15) and decommissioning) • Scheduled Monuments, Listed Buildings, Conservation Areas and Registered Parks and Gardens (construction, operation (year 1 and year 15) and decommissioning) • Ancient Woodland and Natural Designations (construction, operation (year 1 and year 15) and decommissioning) The cumulative effects assessment identifies there to be a Neutral impact on the following visual receptors: • Transport Receptor – T005 / Lincoln Lane - between Tillbridge Lane & Church Lane (operation (year 15) and decommissioning. More detail is provided within **6.3.8.2 Environmental Statement - Appendix 8.2 Assessment of Potential Landscape Effects [APP-073], 6.3.8.3 Environmental Statement - Appendix 8.3 Assessment of Potential Visual Effects [APP-074**] and within the **Supplementary Landscape and Visual Effects Tables [REP1-058** and **REP1-059]**
WLDC 7.35 WLDC 7.36	WLDC considers there to be the following negative impacts associated with the proposed solar farms: 1. Adverse impacts on landscape character and visual effects will occur as a consequence of the project though construction, operation and decommissioning phases. 2. The cumulative impact with other projects will cause unacceptable significant harm on the landscape	The Applicant notes WLDC's comments in relation to Adverse effects. Cumulative landscape and visual effects relating to the Cumulative Developments have been considered at section 8.10 of the LVIA **[APP-046].** The Cumulative Assessment is undertaken in accordance with **6.3.8.1 Environmental Statement - Appendix 8.1 LVIA Methodology [APP-072]** that was agreed with LCC at the series of workshops as set out **in 6.3.8.4 Environmental Statement - Appendix 8.4 Consultation [APP-075]**. The Cumulative Assessment is based on the additional changes caused by the Scheme in combination with other similar developments. This includes

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	character and visual effects over a very long period of time.	schemes with planning consent and schemes that are subject of a validated planning application that has not yet been determined. As set out within the Cumulative Assessment Methodology this includes three other solar projects; Cottam Solar Project; Gate Burton Energy Park and Tillbridge Solar. The cumulative effects assessment identifies there to be an Adverse impact on the following landscape receptors: • RLCT 3a Floodplain Valleys (Construction) • BLCA LCT Trent Washlands (individual Policy Zones TWPZ21, TWPZ22, TWPZ23, TWPZ24 and TWPZ48) (Construction) • Land Use (Construction) • Nationally and Locally Designated Landscape (construction, operation (year 1 and year 15) and decommissioning) The cumulative effects assessment identifies there to be an Adverse impact on the following visual receptors: • Viewpoint LCC-A - Middle Street (construction, operation (year 1 and year 15) and decommissioning) • Viewpoint VP15 – Till Bridge Lane and Middle Street(construction, operation (year 1 and year 15) and decommissioning) • Transport Receptor – T005 / Lincoln Lane - between Tillbridge Lane & Church Lane (construction, operation (year 1). • Transport Receptor – T058 / Northern Railway - Saxilby to Gainsborough (construction, operation (year 1 and year 15) and decommissioning) More detail is provided within **6.3.8.2 Environmental Statement - Appendix 8.2 Assessment of Potential Landscape Effects [APP-073],**

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		6.3.8.3 Environmental Statement - Appendix 8.3 Assessment of Potential Visual Effects [APP-074] and within the **Supplementary Landscape and Visual Effects Tables [REP1-058** and **REP1-059]**
LCC 7.10 LCC Appendix 1	LCC raise concerns regarding inconsistencies between the Draft Development Consent Order and the Landscape and Visual Impact Assessment (LVIA) report. 1. The LVIA's intention is to retain and enhance trees and hedgerows, however, the draft DCO is seeking permission to have the ability to remove all hedgerows and trees within the redline to facilitate the development. 2. The extent of tree and hedgerow removal should be more proportionally set out in the DCO rather than including the full length of every hedgerow. The extent of vegetation removal completely unacceptable and unnecessary, it is also not captured on any vegetation removal plans or within the LVIA. 3. *"the LVIA is utilising the Rochdale Envelope approach, so the 'worst case', based on the Draft DCO and permission to remove extensive hedgerows and trees, would likely be an assessment with little or no retained existing vegetation within the site redline."*	Please see the Applicant's response to First Written Question 1.8.9 in the **Applicant's Response to the First Written Questions [EN010132/EX3/WB8.1.21]**.
LCC 7.117	*"The LVIA and the associated figures, appendices and documents together are a large set of work that provides a very*	The Applicant submitted a summary of the main findings of the LVIA and a narrative of effects at **Deadline 1**, in the **8.2.1 Supplementary Landscape**

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	detailed analysis of the development and its impact upon the baseline landscape and visual conditions of the site and surrounding area. However, the volume of information and a lack of clear, overarching narrative and summary result in making the detailed information inaccessible and often difficult to follow."	**Effects Tables [REP1-058]** and in **8.2.2 Supplementary Visual Effects Tables [REP1-059]**. These supplementary tables are to assist readers in understanding the conclusions of the LVIA. They set out the conclusions of effect significance at each receptor for each year of assessment, with a summarising narrative to provide context.
LCC 7.12 LCC 7.19	LCC raise the following issues with the LVIA: 1. *"By reason of its mass and scale, the assessment is that the Development would lead to significant adverse effects on landscape character and visual amenity at all phases of the scheme (construction, operation year 1, operation year 15, and decommissioning). The Development has the potential to transform the local landscape by altering the character on a large scale. This landscape change also has 15 the potential to affect wider landscape character, at a regional scale, by replacing large areas of agricultural or rural land with solar development, affecting the current open agricultural character that is identified as key defining characteristics of the area.* 2. *The LVIA needs to clearly express the authors judgement about changes to the landscape and views from the implementation of the development, which is currently missing as it is contained within multiple sources relying on the reader cross referencing multiple appendices and other ES chapters and parts of the DCO application.*	The Applicant acknowledges these comments and responds to each in turn: 1. The LVIA **[APP-046]** takes into account the effects on visual amenity and landscape character in detail, from the national scale, through regional, county district and local scales to the landscape character areas within the 5km Study Area. For further information, please refer to **6.3.8.2 Environmental Statement - Appendix 8.2 Assessment of Potential Landscape Effects [APP-073], 6.3.8.3 Environmental Statement - Appendix 8.3 Assessment of Potential Visual Effects [APP-074**]. The Applicant has submitted a summary and narrative of effects at **Deadline 1** set out in **8.2.1 Supplementary Landscape Effects Tables [REP1-058]** and in **8.2.2 Supplementary Visual Effects Tables [REP1-059]** which summarise the main findings of the LVIA. Mitigation, including offsets and planting, has been proposed to address and minimise adverse effects on the character of the landscape. This is in line with the agreed methodology and the hierarchy of approach advocated by the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition and was agreed with LCC at the series of workshops, as set out in in **6.3.8.4 Environmental Statement - Appendix 8.4 Consultation [APP-075].**

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	3. *The main LVIA chapter would benefit from being reduced in size and furnished with a clear and concise written summary of the findings. In particular, it would be useful to have the identification and clear explanation of which aspects of landscape and visual change are more important, which are not, and why they are. This should be clearly laid out using plain, easy to understand language. The examination process now provides the opportunity to develop a clearer and more succinct identification and summary of the key landscape and visual issues and effects."*	The mitigation associated with the landscape receptors for the Scheme is set out in the **Outline Landscape and Ecological Management Plan - Revision B [EN010132/EX3/WB7.3_B],** Landscape and Ecology Mitigation and Enhancement Measure plans **[APP-281 to APP-283]** and secured by Requirement 7 of the DCO **[EN010132/EX3/WB3.1_C]**. The LVIA considers the effects of the delivery of landscape mitigation to landscape character by addressing biodiversity net gain through the enhancement of existing habitats and green infrastructure. The Outline LEMP **[EN010132/EX3/WB7.3_B]** also prescribes how the landscape and ecology mitigation measures identified and proposed will be implemented and managed to ensure the effectiveness and certainty in achieving the objectives. 2. Please see the response to LCC 7.117 above in respect of the **.2.1 Supplementary Landscape Effects Tables [REP1-058]** and in **8.2.2 Supplementary Visual Effects Tables [REP1-059]**. 3. Please see the response to LCC 7.117 above in respect of the **.2.1 Supplementary Landscape Effects Tables [REP1-058]** and in **8.2.2 Supplementary Visual Effects Tables [REP1-059]**.
LCC 7.13 LCC 7.14 LCC 7.15 LCC Appendix 1	LCC identify inconsistencies in the LVIA as follows: Judgements on landscape and visual effects in the LVIA are inconsistent in paragraphs 4.9 and 5.9 of the Appendix B. These findings lack appropriate justification. *"The justification for the benefits is predominantly reliant upon landscape benefits, not visual - the scheme does not improve or*	The Applicant notes LCC's comments. These comments appear to relate to the small number of inconsistencies within the original LVIA. These inconsistencies are contained within the residual visual effects section of the LVIA (section 8.11) at Tables 8.74, 8.75, 8.76, 8.77 & 8.78. In each of these, the nature of effect is incorrectly identified as beneficial in the tables. This is also repeated within the Environmental

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	enhance the view, and generally does not screen or integrate existing visual detractors."	Statement NonTechnical Summary (NTS) [**APP-308**]. In both instances, this is unfortunately a typo. To be consistent with all other references in the LVIA, the technical appendices and Chapter 23 Summary of Significant Effects [**APP-061**], this should read 'adverse'. This correction to the nature of effects, results in no changes to the findings or conclusions of the LVIA. the remainder of the LVIA, the technical appendices and summary of significant effects are all correct. More detail can be foiund within the Summary of Oral Submissions made by Interested Parties at Open Floor Hearing 1 and the Applicants Response **[REP1-051].**
LCC 7.16	*"It is also concluded that the cumulative landscape and visual effects of the Development will also bring about significant landscape and visual effects, particularly when assessed alongside the proposed Gate Burton, Cottam and Tillbridge Solar schemes. The mass and scale of these projects combined would lead to adverse effects on landscape character and visual amenity over an extensive area. The landscape character of the local, and potentially regional area, may be changed completely, particularly when experienced sequentially while travelling through the landscape."*	The Applicant notes LCC's comments in relation to Adverse effects. Cumulative landscape and visual effects relating to the Cumulative Developments have been considered at section 8.10 of the LVIA **[APP-046].** The Cumulative Assessment is undertaken in accordance with **6.3.8.1 Environmental Statement - Appendix 8.1 LVIA Methodology [APP-072]** that was agreed with LCC at the series of workshops as set out in **6.3.8.4 Environmental Statement - Appendix 8.4 Consultation [APP-075].** The Cumulative Assessment is based on the additional changes caused by the Scheme in combination with other similar developments. This includes schemes with planning consent and schemes that are subject of a validated planning application that has not yet been determined. As set out within the Cumulative Assessment Methodology this includes three other solar projects; Cottam Solar Project; Gate Burton Energy Park and Tillbridge Solar. The Cumulative Assessment does not conclude any significant Beneficial effects. In regard specifically to Land Use, following the creation and establishment of extensive mixed grassland habitats at year 1 and year 15 of operation In-combination effects are Minor Beneficial (Not Significant).

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		The Cumulative Assessment identifies there to be an Adverse impact (not significant) on the following landscape receptors: • RLCT 3a Floodplain Valleys (Construction) - Negligible Adverse (Not Significant). • BLCA LCT Trent Washlands (individual Policy Zones TWPZ21, TWPZ22, TWPZ23, TWPZ24 and TWPZ48) (Construction) - Negligible Adverse (Not Significant). • Land Use (Construction) - Minor Adverse (Not Significant). • Nationally and Locally Designated Landscape (construction, operation (year 1 and year 15) and decommissioning) - Negligible Adverse (Not Significant) The Cumulative Assessment identifies there to be an Adverse impact on the following visual receptors: • Viewpoint LCC-A - Middle Street (construction, operation (year 1 and year 15) and decommissioning) - Negligible Adverse (Not Significant). • Viewpoint VP15 – Till Bridge Lane and Middle Street(construction, operation (year 1 and year 15) and decommissioning) - Negligible Adverse (Not Significant). • Transport Receptor – T005 / Lincoln Lane - between Tillbridge Lane & Church Lane (construction, operation (year 1) - Negligible Adverse (Not Significant). • Transport Receptor – T058 / Northern Railway - Saxilby to Gainsborough (construction, operation (year 1 and year 15) and decommissioning) - Minor Adverse (Not Significant).

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		More detail is provided within **6.3.8.2 Environmental Statement - Appendix 8.2 Assessment of Potential Landscape Effects [APP-073], 6.3.8.3 Environmental Statement - Appendix 8.3 Assessment of Potential Visual Effects [APP-074**] and within the **Supplementary Landscape and Visual Effects Tables [REP1-058** and **REP1-059]**
LCC 7.17	LCC have set out the following details relating to landscaping: 1. Any tree and vegetation removal associated with the development, including wider highways improvements and access for construction, must be clarified, and subsequently any works (such as lopping or pruning), or removal to trees and hedgerows must be agreed prior to any works commencing. 2. If the project process, more detailed landscape proposal plans including *landscape mitigation, location and types of planting (species), as well as number, density and specification* must be provided prior to any works commencing. The mitigation illustrated on the relevant figures has been utilised to assess the landscape and visual effects of the scheme, therefore the Council would expect any detailed landscape proposals consist of the area and extent shown on these plans as a minimum.	The Applicant notes these comments. The mitigation associated with the landscape receptors for the Scheme is set out in **WB7.3_B Outline Landscape and Ecological Management Plan Revision B [EN010132/EX3/WB7.3_B],** Landscape and Ecology Mitigation and Enhancement Measure plans **[APP-281 to APP-283]** and secured by Requirement 7 of the DCO **[EN010132/EX3/WB3.1_C]**.

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LCC 7.20	*"the development will cause negative impacts on the landscape character both individually and also negative impacts due to the cumulative impacts with the other solar projects in the area namely Gate Burton, Cottam and Tillbridge."*	These points are addressed above in relation to comments made by LCC at LCC 7.16, LCC 7.19, LCC 7.12, LCC7.35, LCC 7.36, LCC7.33, LCC7.27, LCC7.23, LCC7.17, LCC7.13 and LCC7.1.1 and so are not repeated here.
2.12 Minerals		
WLDC 17.1	WLDC raise the following issues with the Minerals chapter of the ES: *"The proposed Cable Route Corridor has the potential to result in operational issues for future mineral operations and might restrict the efficient exploitation of the resource."*	The Applicant acknowledges that this comment is extracted from Paragraph 12.12.2 of **WB6.2.12 ES Chapter 12: Minerals [APP-050]**. This impact has been mitigated wherever possible by cable routes following existing infrastructure corridors or edges of significant landscape features. Installing the cable under the access road to Sturton le Steeple quarry using methods that do not disturb the surface will ensure that this quarry can maintain the supply of sand and gravel to local markets **[APP-050]**.
WLDC 17.6	WLDC identifies no positive impacts during construction, operation, and decommissioning.	The Applicant acknowledges this comment.
WLDC 17.7 to 17.8 and 17.1 to 17.3	WLDC identifies the following neutral impacts during construction, operation, and decommissioning: 1. *"In terms of potentially disturbing a mineral deposit to the extent it becomes unviable to exploit, in this case the only identified surface mineral the Scheme affects are sand and gravel deposits. On the basis that the Scheme does not require deep excavations and foundations are limited to galvanised steel poles driven into the ground, disturbance is limited to the surface layers rather than underlying deposits and the Scheme*	The Applicant responds to the matters raised by WLDC in turn: 1. The Applicant acknowledges that this comment is extracted from Paragraph 12.7.4 of **WB6.2.12 ES Chapter 12: Minerals [APP-050]**. 2. The Applicant acknowledges that this comment is extracted from Paragraph 12.12.1 of **WB6.2.12 ES Chapter 12: Minerals [APP-050]**. 3. The Applicant acknowledges that this comment is extracted from Paragraph 12.7.17 of **WB6.2.12 ES Chapter 12: Minerals [APP-050]**.

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	would not affect the long-term viability of working the identified sand and gravel resource. 2. *There are no permitted or proposed mineral extraction sites within close proximity that might be affected by the Scheme.* 3. *The Scheme will be decommissioned at the end of its (approximately 40 year) operational life and all above ground structures will be removed and the land restored. Such measures will essentially restore the baseline condition for the identified mineral resources.* 4. *In view of the current policies of the Mineral Planning Authority, the current sand and gravel landbank and the extensive areas covered by the Area of Search, it seems highly unlikely that the sand and gravel reserve partially underlying the Scheme will need to be worked within the lifetime of the Scheme. Therefore the Scheme is not considered to have a significant impact on the potential sand and gravel supply in the County during the life of the Scheme.* 5. *In terms of petroleum exploration and development, it is not considered that the proposed Scheme would have any implications for existing or proposed exploration and eventual exploitation of oil and gas resources."*	4. The Applicant acknowledges that this comment is extracted from Paragraphs 12.7.18 and 12.7.11 of **WB6.2.12 ES Chapter 12: Minerals [APP-050]**. 5. The Applicant acknowledges that this comment is extracted from Paragraph 12.7.28 of **WB6.2.12 ES Chapter 12: Minerals [APP-050]**.
WLDC 17.4	WLDC identifies the following negative impact during construction, operation, and decommissioning:	The Applicant acknowledges that this comment is extracted from Paragraph 12.12.2 of **WB6.2.12 ES Chapter 12: Minerals [APP-050]**.

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	"The proposed Cable Route Corridor, particularly in the Trent Valley, however, does have the potential to result in operational issues for future mineral operations and might restrict the efficient exploitation of the resource. This impact has been mitigated wherever possible by cable routes following existing infrastructure corridors or edges of significant landscape features rather than directly crossing open fields. Such an approach avoids creating a further obstruction to the future exploitation of the mineral resource."	This impact has been mitigated wherever possible by cable routes following existing infrastructure corridors or edges of significant landscape features. Installing the cable under the access road to Sturton le Steeple quarry using methods that do not disturb the surface will ensure that this quarry can maintain the supply of sand and gravel to local markets **[APP-050]**.
WLDC 17.6	WLDC identifies no positive cumulative impacts during construction, operation, and decommissioning.	The Applicant acknowledges this comment.
WLDC 17.7 to 17.10	WLDC identifies the following neutral cumulative impacts during construction, operation, and decommissioning: 1. There are no other plans or proposals for other developments that directly affect mineral reserves. 2. *"The Applicant has worked with Cottam Solar Project and with Gate Burton Energy Park to establish a Shared Cable Route Corridor to minimise the overall impact. Without this mitigation multiple cable routes across this safeguarded reserve would further bisect it adding further constraints to any future mineral working and whilst not actually physically sterilising any mineral deposit might make areas uneconomic to work.* 3. *The potential cumulative impact is considered small as these proposals only affect a relatively small area of an*	The Applicant agrees that there is anticipated to be neutral cumulative impacts during construction, operation, and decommissioning. This has been assessed in **WB6.2.12 ES Chapter 12: Minerals [APP-050]** in the following paragraphs: 1. 12.10.2; 2. 12.10.3; 3. 12.10.7; and 4. 12.10.8.

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	extensive area of search for the lifetime of each of these proposals. 4. *The Tillbridge Solar scheme does not appear to affect any safeguarded mineral deposits."*	
WLDC 17.11 to 17.14	WLDC identifies the following negative cumulative impacts during construction, operation, and decommissioning: 1. *"The Cable Route Corridors linking the solar array Sites to the former West Burton Power Station site overlap with proposed cable corridors for Gate Burton Energy Park, and for a short distance, also with the cable corridor for the proposed Cottam Solar Project. Much of the overlap is within an area of safeguarded sand and gravel reserves associated within the Trent Valley.* 2. *Any other proposals for development that sterilise safeguarded mineral resources, particularly those also identified as Area of Search for sand and gravel in the Lincolnshire Minerals and Waste Local Plan, could have an impact on the supply of sand and gravel within Lincolnshire.* 3. *The Cottam Solar Project consists of a number of parcels of land, which lie to the north and north east of the West Burton Scheme. One area within the Cottam Solar Project approximately 13.5 km north of the Scheme lies within the same Area of Search for sand and gravel as West Burton."*	The Applicant agrees that there is anticipated to be adverse cumulative impacts during construction, operation, and decommissioning. This has been assessed in **WB6.2.12 ES Chapter 12: Minerals [APP-050]** at the following paragraphs: 1. 12.10.3; 2. 12.10.4; and 3. 12.10.5. The Applicant reiterates that the potential cumulative impact is considered small as these proposals only affect a relatively small area of an extensive area of search for the lifetime of each of these proposals. The cumulative impact is not considered to be significant, as assessed in paragraph 12.10.7 of **WB6.2.12 ES Chapter 12: Minerals [APP-050].**

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LCC 11.5	*"The Council therefore have no mineral safeguarding objections to the proposals and therefore the impacts on the minerals resource is assessed as neutral."*	The Applicant acknowledges this comment.
2.13 Noise and Vibration		
WLDC 14.1.1	WLDC raise the following issues with the Noise and Vibration chapter of the ES: 1. *"Information has been taken from technical guidance documents to identify thresholds levels at which negligible, minor, moderate and major impacts occur. However, the mapping of these impact threshold levels for construction noise underestimates significance.* 2. *Further information is required explaining how this noise level was selected as no baseline noise surveys were undertaken along the cabling route.* 3. *Detailed information on the noise survey methodology and contextual information about the survey locations is not reported.* 4. *Graphs presenting statistical information on the measured background sound levels at the long-term monitoring sites are presented in the ES chapter (e.g. Figure 15.1). No information is provided on how the data have been interpreted to select appropriate background sound levels for the operation phase assessment.*	The Applicant acknowledges these comments and responds in turn: 1. The magnitude of effect criteria for construction noise has been mapped incorrectly (Table 15.4) in **6.2.15 ES Chapter 15 Noise and Vibration [APP-053]**, however, the construction noise assessment has utilised the correct threshold value for significance of 65 dB and therefore the results of the assessment remain valid. Noise levels from potential construction activity associated with the Scheme were assessed in accordance with BS 5228-1:2009 + A1 2014 criteria which indicate if a significant effect is likely to occur at noise sensitive properties. Category A threshold value of 65dB is the lowest daytime LAeq,T threshold value. In addition, construction phase noise is temporary and transient and will only occur during the daytime. Furthermore, Best Practicable Means (BPM) will be implemented to reduce construction noise levels from the site, refer to **6.3.15.3 ES Appendix 15.3 Assessment of Key Effects [APP-131]**. 2. As stated in paragraph 15.4.21 of the ES Chapter 15 **[APP-053]**, the cable route corridor assessment has been based on fixed limits noise criteria, due to the impracticality of surveying the large area. Therefore, the threshold limit should be 70 dB for rural areas and not 65 dB as stated. The conclusion of the construction noise assessment remain valid as all receptors are below the 70 dB threshold except for the three receptors highlighted in the ES chapter.

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	5. *It is noted that maps of the short-term and long-term monitoring locations are provided, however, it is unclear how the measured noise levels have been mapped to receptor locations for the impact assessment.* 6. *The Planning Inspectorate accepted that operation phase vibration can be scoped out provided that potential sources of vibration are described in the ES chapter with details of any measures to be used to control emissions. This comment does not appear to have been addressed. The Noise and Vibration ES chapter does not report any information on potential sources of operation phase vibration or include a statement confirming that there are no potential sources of vibration. Table 15.1 presents a summary of consultation comments and responses, and provides a response about construction vibration against the operation phase vibration comment from the Scoping Opinion. The construction vibration comment from the Scoping Opinion is omitted from this table.* 7. *The noise prediction methodology and outcomes reported in the ES Chapter and Appendix 15.3 (Doc. Ref. EN010132/APP/WB6.3.15.3) omit pertinent information.* 8. *Appendix 15.3 only presents results at the nearest vibration sensitive receptor. As a PPV level above 0.3 mm/s was predicted at West Burton 1, 2 and 3, further information is required to confirm how many*	3. Chapter 15: Noise and Vibration states '*Full details of the noise monitoring surveys are presented within* ***Appendix 15.1*** **[APP-129]**. A summary of the noise monitoring is provided in Paragraph 15.5.5 and 15.5.6 within Chapter 15: Noise and Vibration **[APP-053]**. Information regarding locations are provided in paragraphs 15.5.7 to 15.5.9, Table 15.13. 4. Statistical analysis has been used to inform the selection of representative background noise levels for each nearby long term measurement position. Where a clear modal value is presented, this value has been utilised, In some cases, lower background noise levels have been selected where a significant rise in the 'number of occurrences' is presented. 5. Baseline noise results from the nearest representative noise monitoring locations were assigned to receptors in the vicinity of the noise monitoring locations, figures and results are provided within **Appendix 15.1: Noise Survey Information [APP-129]**. 6. There are no potential sources of vibration arising from the operational use of the Scheme. 7. The Applicant respectfully disagrees, **Chapter 15: Noise and Vibration [APP-053], Appendices 15.1 [APP-129] and 15.3 [APP-131]** provide the methodologies, input data and assumptions and detail the overall impacts at receptors. It is not clear from this comment what "pertinent information" WLDC consider is missing. The Applicant would be grateful if this could be specified so a fuller answer can be provided.

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	additional properties located further away may also experience a similar impact. 9. *The construction traffic assessment focusses on the noise impacts resulting from additional vehicles on the road network during the construction phase. Noise impacts linked to traffic diversions as a result of temporary road closures has not been included in the assessment.* 10. *The operation phase results tables shown in Appendix 15.3.5 consistently show that the rating levels (specific sound level plus acoustic penalty) are higher at night than during the daytime (i.e. Table 15.3.11, Table 15.3.16, and Table 15.3.21). It is not clear from the Noise and Vibration chapter why the proposed development would emit more noise at night. The tabulated noise levels seem to contradict paragraph 15.7.68, which states that "the night-time noise levels are likely to be substantially lower in practice". Further clarification is required to confirm the level of impact.* 11. *The rationale behind the selection of the background sound levels used in Appendix 15.3.5 remains unclear in this section of the ES and can affect the stated outcomes of the assessment.* 12. *Paragraphs 15.7.74 and 15.7.78 in the ES chapter state that the rating levels are below 35dB for West Burton 2 and West Burton 3, whereas Appendix 15.3.5 shows rating levels above 35dB (Table 15.3.16, Table 15.3.21).*	8. In terms of vibration, the test for significance would represent a vibration level of above 1.0mm/s as stated in Section 15.4.23 of Chapter 15: Noise and Vibration [APP-053]. None of the nearest sensitive receptors at West Burton 1, 2 and 3 are above this level and therefore vibration levels are considered not significant. 9. On a day-to-day basis, there are not expected to be any road closures to support construction vehicles accessing the Site. There may be very temporary 'rolling' road closures to support the movement of abnormal loads. These would typically last for a matter of minutes and will be undertaken outside of the network peak hours. They will not result in significant traffic diversions. 10. Night-time rating levels are generally slightly higher than the daytime rating levels as night-time receptors are modelled at a height of 4.0m rather than 1.5m during the daytime. The nearer a receptor is to ground level, the more chance there is of direct noise being screened by the intervening topography. 11. Baseline noise results from the nearest representative noise monitoring locations were assigned to receptors in the vicinity of the noise monitoring locations. These figures and results are provided within **Appendix 15.1: Noise Survey Information [APP-129]**. 12. The Applicant agrees with this comment. The methodology adopted for low existing background noise levels particularly at night-time is set out in Paragraphs 15.4.36 - 15.4.40 of Chapter 15: Noise and Vibration [App-053]. Rating levels at some of the receptors are predicted to be above 35 dB. However, existing night-time background levels are significantly below what is considered very low (<30 dB), therefore the absolute noise level assessment should be

LIR Ref.	Summary	Applicant's Response
	Further clarification is required to confirm the level of impact. 13. *Appropriate types of noise mitigation measures are proposed to control noise emissions from the project, however, the stated performance requirement for the acoustic louvres is ambiguous. Clarification is required to confirm whether the 10dB noise reduction refers to the overall performance of the product or specific frequencies."*	considered. Where daytime existing background noise levels are above 30 dB, the background comparison assessment indicates that all receptors fall below the significant adverse effect level. 13. Acoustic louvres were modelled to provide broadband attenuation of at least 10 dB. The performance of acoustic louvres will very between manufacturers. However, a generic acoustic louvre was utilised in the noise model and a reduction of 10dB was achieved. It is considered that a 10dB reduction is readily achievable and is not considered to be a constraint regarding embedded mitigation.
WLDC 14.7 WLDC 14.8	WLDC has identified no positive and no neutral impacts during construction and decommissioning.	The Applicant acknowledges these comments and refers to the responses above in WLDC 14.1.1 regarding construction noise and decommissioning noise, which is not deemed significant in EIA terms.
WLDC 14.9 to 14.11	WLDC identifies the following negative impacts during construction and decommissioning: 1. *"Construction noise levels at all receptors throughout the Scheme are predicted to be within the daytime construction noise criteria of 65 dB(A), except for three of the nearest receptors along the proposed cable route. Construction noise is temporary and it is assumed that all construction activities will be happening simultaneously across the Scheme (worst-case scenario). Construction activity on the Sites and cable corridor would likely be experienced by limited receptors at any given time as work progresses across*	The Applicant acknowledges these comments and refers to the responses above in WLDC 14.1.1 regarding construction noise which is not deemed significant in EIA terms.

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	the Scheme. Therefore, for construction noise, the magnitude of change is negligible which results in a moderate/minor residual effect which is not significant for the purposes of EIA regulations. 2. *Construction activities are temporary and it is considered that any periods of construction vibration experienced at each separate receptor would unlikely exceed one month. Construction activity on the Sites would likely be experienced by limited receptors at any given time as work progresses across the Scheme. Therefore, for construction vibration, the magnitude of change is negligible which results in a moderate/minor residual effect which is not significant for the purposes of the EIA regulations.* 3. *Noise and vibration effects during the decommissioning phase will be similar or less than the noise effects during the construction phase and therefore not deemed significant in terms of EIA."*	
WLDC 14.12 WLDC 14.13	WLDC has identified no positive and no neutral impacts during operation.	The Applicant acknowledges these comments.
WLDC 14.14	WLDC identifies the following negative impact during operation: *"Operational noise levels at the nearest receptors to the Scheme would exceed the existing background noise levels in many cases, and as such have been assessed as having moderate/major significance effects. Mitigation has been used*	The Applicant acknowledges these comments. Operational noise associated with the Scheme results in moderate/minor residual adverse impact and is therefore not considered significant for the

LIR Ref.	Summary	Applicant's Response
	to ensure noise levels during the operational phase do not result in significant impacts throughout the Scheme during the operational phase and consequently the magnitude of change is considered negligible, which results in a moderate/minor residual effect and therefore not considered significant for the purposes of the EIA Regulations."	purposes of the EIA Regulations, as discussed in Section 15.7 of Chapter 15: Noise and Vibration **[APP–053]**.
WLDC 14.15 to 14.17	WLDC identifies the following cumulative impacts during: 1. *"Part of the Cable Route Corridor for the Scheme will overlap with the cable routes of the Gate Burton and Cottam solar farm schemes. There is potential for all three schemes' cable routes to be constructed either simultaneously or sequentially, causing cumulative noise effects at nearby sensitive receptors.* 2. *The likely construction method would be to build all three projects' ducts at the same time, leaving the cables to be pulled through separately at the time of construction for each individual project.* 3. *Given that construction activities for the Cable Route Corridor are transient, it is considered unlikely that a major impact would be experienced for any prolonged duration due to the temporary nature of construction operations. In addition, best practicable means will be implemented and therefore, no significant cumulative effects are identified for the Cable Route Corridor."*	The Applicant acknowledges these comments. Cumulative effects are presented in Section 15.9 of Chapter 15: Noise and Vibration **[APP–053]**.
2.14 Other Environmental Matters		

LIR Ref.	Summary	Applicant's Response
WLDC 21.2	WLDC summarises the main points arising from the review of the Other Environmental Matters chapter of the Environmental Statement: *"The Scheme is questionably not in accordance with Policy S54: Health and Wellbeing, as the Scheme does not take into account achieving positive mental and physical health outcomes."*	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 **6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]**). 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 **6.2.21 Environmental Statement - Chapter 21 Other Environmental Matters [APP-059]**. The Applicant therefore considers that the Scheme is in accordance with Policy S54.
WLDC 21.13 WLDC 21.16	WLDC identify no positive and negative impacts during construction, operation and decommissioning.	The Applicant notes these comments.
WLDC 21.14 to 21.15	WLDC identify the following neutral impacts during construction, operation and decommissioning: 1. *"The impacts from flooding on infrastructure and on human health of workers is anticipated to be not significant.* 2. *The review of climate change resilience set out in ES Chapter 7: Climate Change (Doc. Ref. EN010132/APP/WB6.2.7) identifies that the impacts of increased rainfall events, winter precipitation, and increased probability of extreme weather events on the Scheme's construction is anticipated to be medium to high magnitude. However, given the timescale of construction, it is not anticipated these events will be significantly more likely than the baseline, and as such,*	1. The Applicant's position aligns with WLDC's comments. 2. The Applicant's position aligns with WLDC's comments.

LIR Ref.	Summary	Applicant's Response
	the anticipated impacts are not severe and are not significant."	
WLDC 21.18	WLDC identify the following positive cumulative impacts: *"The uplifts in employment and skills training and education opportunities are anticipated to have significant beneficial effects on human health and wellbeing as a result of improved measures of indices of multiple deprivation. The level of significance is not however anticipated to be increased by cumulative effects."*	The Applicant's position aligns with WLDC's comments.
WLDC 21.19	WLDC identify the following neutral cumulative impacts: *"The risk of fire from the BESS during construction and decommissioning is negligible due to the containerised construction of the storage units, thus reducing the risk of damage to battery cells which may cause fires. Furthermore, risks associated with damage to battery cells is likely to be isolated and so risk of larger fires is reduced."*	The Applicant also confirms that specific Emergency Response Plans (ERP) will be drafted and agreed with LFR for all stages of the BESS lifecycle, namely, construction, commissioning, operation and decommissioning. This is set out in Section 5.4 of **7.9 Outline Battery Storage Safety Management Plan [APP-318]** which is secured through Requirement 6 of the **3.1 Draft Development Consent Order [EN010132/EX3/WB3.1_C].**
WLDC 20.21 to 21.21	WLDC identify the following negative cumulative impacts: 1. *"Cumulative effects during construction on long distance recreation routes are anticipated to have a peak cumulative moderate adverse effect, specifically on the Trent Valley Way. This has a secondary impact on public health and wellbeing as a result of decreased desirability and use of a recreational walking route.* 2. *The residual cumulative effects on other human health receptors, such as access to primary healthcare,*	The Applicant agrees that there are adverse cumulative impacts on long distance recreational routes (specifically the Trent Valley Way only) at paragraph 18.10.32 in **6.2.18 ES Chapter 18: Socio-Economics, Tourism and Recreation [APP-056]**. The residual cumulative effects on other human health receptors as set out at paragraph 18.10.41 are not significant.

LIR Ref.	Summary	Applicant's Response
	disability and long-term health, self-assessed health, and on access and use of outdoor recreation centres for adults and for youths are not anticipated to be significant."	
LCC 14.8	*"Having reviewed the Outline Battery Storage Safety Management Plan the Council is satisfied that the details meet the requirements the Council set out in Fire Safety Position statement issued at the pre-application stage of the process."*	The Applicant's position aligns with WLDC's comments.
LCC 14.9	1. *"However, without further specific details, e.g. detailed plans etc., the response is based very much on the details within the application documents and note that a requirement is proposed for details of a fire safety plan to be submitted and approved by the Relevant Planning Authority.* 2. *In addition to ensure battery energy storage system (BESS) risk of fire is minimised to reduce the risk to a level that makes the development acceptable in respect of safety and associated risk of pollution should a thermal outbreak take place. To achieve this it would be necessary for the applicant to enter into a Protective Provisions arrangement with Lincolnshire Fire and Rescue within the DCO.* 3. *This also includes any requirement for Hazardous Substance Consent for the battery storage facility if this is considered necessary to be included in the Development Consent Order."*	The Applicant acknowledges these comments and responds to each point in turn: 1. The Applicant will continue engaging with the Lincolnshire Fire and Rescue Service throughout the DCO hearing process and will fully consult at the detailed design stage if planning permission is granted. 2. Protective Provisions included in Part 16 of Schedule 16 of the draft DCO submitted at Deadline 2 [REP2-006] have been agreed with Lincolnshire Fire & Rescue Service. 3. If required at the detailed design stage where a specific BESS design is selected, the Applicant will apply for Hazardous Substance Consent.

LIR Ref.	Summary	Applicant's Response
LCC 14.11	*"Therefore on balance the Council considers the impacts associated with matters relating to accidents and disasters, and health to be neutral. This position will be reviewed as further information for fire safety measures and arrangements for subsequent monitoring of the BESS is agreed."*	The Applicant's position aligns with LCC's comments.
2.15 Public Rights of Way (PRoWs)		
NCC 8.3	The following public rights of way are affected by the grid connection corridor. Sheet 10: • Sturton le Steeple Footpath no 17 • Sturton le Steeple Restricted byway no 32 (Common Lane, north end) • Sturton le Steeple Footpath no 15 Sturton le • Steeple Footpath no 39 Sheet 9 • Sturton le Steeple Restricted Byway no 32 (Common Lane, south end) • Sturton le Steeple Bridleway no 5 (Fenton Lane) • North Leverton with Habblethorpe Footpath no 18 Sheet 8 • North Leverton with Habblethorpe byway no 14 (Craikbank Lane)	The Applicant acknowledges this comment.

LIR Ref.	Summary	Applicant's Response
	• North Leverton with Habblesthorpe Restricted byway no 25	
LCC 9.4 LCC 9.5	1. *"As a general observation on the wording of the draft DCO there needs to be greater clarity regarding the necessary temporary stopping up of paths and advance notice procedures. There needs to be a clear procedure for temporary closing or diverting rights of way with clear details about reinstatements of any paths and surface of any diverted routes.* 2. *In respect of dDCO Section 11: there is a need for further clarity and agreement as to how the temporary stopping up will work and how the advance notices will work. There needs to be a description about what trigger points any powers would be used and how the closures would work."*	Please refer to the Applicant's response to question 1.14.16 in the **Applicant's Response to the First Written Questions [EX3/WB8.1.21]**.
LCC 9.6 to 9.8	LCC identify the following issues with the Outline PRoW Management Plan (OPMP): 1. Outline PROW Management Plan (OPMP): There also needs to be some clarification about the surface of any diversion route and the reinstatement of the paths once construction has been completed. The Council welcome the statement at 3.7 of the OPMP that any damage to the surface of the footpath will be repaired as soon as practical it would be useful to understand what this means and to include the Council in any discussions regarding reinstatement.	**3.1_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C]** sets out the extent to which powers to temporarily stop up PRoWs are sought, both with regard to geographical extent (i.e. the length and location of the PRoWs affected) and full extent of the powers sought. Details of the need to close or divert each affected PRoW, and the procedure for doing so are set out in the outline **6.3.14.3_B Environmental Statement Appendix 14.3 Public Rights of Way Management Plan Revision B [EN010132/EX3/WB6.3.14.3_B]**. A full detailed plan that is substantially in accordance with the outline Public Rights of Way Management Plan is secured by Requirement 18 in Schedule 2 of the Draft DCO.

LIR Ref.	Summary	Applicant's Response
	2. Also welcome the approach to undertaking works overnight as detailed in 3.8 of the OPMP, and will remaining open and managed during the day, as this will minimise the impact to the public. 3. There are no details of the path surface specification within the OPMP, it would be helpful to have this detailed for clarity.	
LCC 9.9 LCC 9.10	1. *"Much of the processes and procedures could form part of the rights of way management plan under Section 18 of the dDCO; for the temporary closures, there does not appear to be any notice periods or time frames for diversions and closures included in Article 11 or the OPMP. It is noted a lot of use of the word "reasonable", which gives uncertainty as it is undefined and ripe for argument. It would be best to avoid any potential for disagreement in the future. "Reasonable time" for closure is not defined and it would be good to have better clarity here. It is also not clear what the trigger points for temporary diversions/closures would be as the wording is that the undertaker "may" close/divert the paths rather than "will". The Council suggests that the Road Traffic Regulation Act 1984 is used instead which provides a solid notice period and controlled process for closure, a defined limit (6 months), with options to go to the Secretary of State. Alternatively, a similar process should be written into the DCO if the*	1. Please refer to the Applicant's responses to questions 1.14.16 and 1.14.17 in the **Applicant's Response to the First Written Questions [EX3/WB8.1.21]**. Compliance with the approved management documents is secured by the Requirements in Schedule 2 to the **draft Development Consent Order (Version C provided at Deadline 3) [EN010132/EX3/WB3.1_C]**, with the result that any non-compliance will constitute a breach of the Order and therefore a criminal offence. The word 'reasonable' is used in Article 11 and the oPRoWMP to provide a limited flexibility in the relevant timescales, without being so prescriptive that it may result in difficulties implementing the Scheme. The use of 'reasonable' reflects that what constitutes a reasonable notice may differ depending on factors such as the extent of a temporary restriction on the use of a PRoW, or the duration of construction works that necessitate the restriction. As these matters will only be understood following detailed design, it would be premature to include prescriptions for what amounts to 'reasonable' during the Examination of the Scheme. The use of reasonable in this context is extensively precedented in DCOs, including article 11 of The Longfield Solar Farm Order 2023 and article 10 of The Cleve Hill Solar Park Order 2020.

LIR Ref.	Summary	Applicant's Response
	developer does not wish to separately apply for a temporary closure etc." 2. *Records shows that there are a number of routes within or close to the Order limits which are claimed paths and if these claims are successful this will have the potential to impact on the development if not addressed in the DCO."*	The use of 'may' reflects that article 11 provides the undertaker with the power to restrict access to, temporarily close, or divert PRoWs, but that the undertaker is not obliged to do so. Amending article 11 to state that the undertaker 'will' restrict PRoWs would require the Applicant to do so, whether or not it was necessary. This would have clear adverse impacts on the users of the PRoWs and is to be avoided. Article 11 provides a bespoke power for the Applicant to temporarily restrict access to streets and PRoW. It incorporates a number of elements from the Road Traffic Regulation Act 1984 (RTRA), including at paragraph (7) confirming that expressions used in article 11 and the RTRA have the same meaning as in the RTRA. This ensures that, to the extent practicable, article 11 and restrictions made under that article will be interpreted in the same manner as the RTRA and restrictions imposed under that Act. However, the RTRA is not suitable to be used for the management of PRoWs within the Order limits for the following reasons: • The RTRA empowers the local highway authority to make Traffic Regulation Orders (TROs) to permanently or temporarily prohibit or restrict the use of PRoWs. This places an additional burden on the local highway authority to make TROs to facilitate the Scheme, increases uncertainty as to whether a TRO will be made, or when it would apply from, causing difficulties in implementing the Scheme; • The purposes for which TROs may be made are limited to those listed in section 1 of RTRA; the purposes of constructing or maintaining developments such as the Scheme are not listed. As such, a TRO may not be available in any event; • A TRO may provide a diversion for a closed route but the route of any diversion is limited to existing highway (including PRoW); the

LIR Ref.	Summary	Applicant's Response
		Applicant has made provision to divert PRoWs (where it may be necessary for health and safety reasons) within the hatched areas shown on the **Public Rights of Way Plan [EX3/WB2.4_A]**. The DCO powers also enable the diversion of PRoW generally, which could be over any location within the Order limits as this area will subject to the Applicant's control, reducing disruption to users; and • The RTRA does not provide any mechanism for compensation to be recovered by a person who suffers loss due to the suspension of any street or PRoW by a TRO; article 11(5) provides an entitlement to compensation for this loss under the Land Compensation Act 1961. For these reasons, article 11 of the **draft Development Consent Order (revision C provided at Deadline 3) [EX3/WB3.1_C]** is to be preferred. 2. The Applicant acknowledges that a number of applications for definitive map modification orders (DMMO) have been made that, if granted, could be affected by the Scheme. The Applicant has amended the DCO to provide a definition of "public right of way" to include PRoWs that are added to the definitive map and statement after the making of the Order. This ensures that, if a PRoW is added over land within the Order limits, the Applicant may use the powers within article 11, with the agreement of the highway authority, to temporarily close or divert the new PRoW. The Applicant is considering if further provision should be made to ensure that claimed paths do not constitute an impediment to the Scheme, should they be added to the definitive map and statement in due course.
LCC 9.12 to 9.17	1. *"Broxholm PF196 crosses the blue land and should be retained/reserved upon completion of the construction. Agree the proposed diversion in Schedule 6 of the dDCO as a mitigation measure instead of a closure, however*	1. Paragraph 3.12 of the **outline Public Rights of Way Management Plan (oPRoWMP) [EN010132/EX3/WB6.3.14.3_B]** confirms that it is not anticipated that any temporary PRoW diversions will be required. The diversion area for Brox/196/1 is provided for the unlikely case that a

LIR Ref.	Summary	Applicant's Response
	the area marked as a potential diversion area is very large. It would be good to get some agreement here over what the diversion will be, or at least to agree that the diversion needs to be the shortest route practicable and conforms the general desire line. 2. *There is potential for Codder Lane Belt to be an historic highway. There is potential that this lane may be subject to a claim for future public rights. The lane itself offers strategic potential to the network, offering a link between existing recognised highways. There is potential for this to be dedicated as a highway as part of the scheme as a potential enhancement.* 3. *Morton PF68 crosses pink land, and it is considered that there is an opportunity to improve the right of way as part of this development by a permanent diversion to the north.* 4. *Tillbridge Lane/Stow Park Road is not inviting for onward pedestrian journeys and the termination point of PF68 ends on a busy and fast A road with no ongoing right of way to the north. A permanent diversion of the path alongside the field edge would reposition the termination point of the path to the 30mph speed restricted part of the road and create a short circular route for residents in Marton and make the path much more attractive and useful. This would also avoid the need for temporary diversion or closure of the path.*	temporary diversion is required for health and safety reasons. Any diversion will need to adequately address the health and safety reasons for which it is required; it is not possible at this stage to narrow the diversion area or commit to following desire lines as the nature and extent of any health and safety issue that cannot be managed without a diversion is not known. 2. Please refer to LCC 9.9 / 9.10 above in respect of how the potential for claimed paths to be added to the definitive map and statement is managed within the draft DCO. The permissive path (Work No. 11 in Schedule 1 to the **draft Development Consent Order (Version C provided at Deadline 3) [EX3/WB3.1_C]**) follows part of the route of the Codder Lane Belt, providing this enhancement benefit. 3. Please see the response to point 4. 4. The Applicant acknowledges that PRoW Mton/68/1 currently crosses a field within the Order limits, following an approximately straight line until it meets Tillbridge Lane / Stow Park Lane outside of Marton. Provision is made within the draft DCO for this footpath to be temporarily diverted within the area shown hatched in green on Sheet 7 of the **Public Rights of Way Plan [EX3/WB2.4_A]**. The Applicant acknowledges the comments of LCC and the desire for a permanent diversion so that this PRoW would instead turn northwards and be routed along the western edge of the field within the Order limits / eastern edge of Marton. The Applicant is considering the practical feasibility of requested diversion and the implications for the Scheme if this change were adopted. In particular, the Applicant is mindful that additional powers would need to be included within the draft DCO to empower the Applicant to permanently divert a PRoW. 5. Please see the Applicant's response to point 1.

LIR Ref.	Summary	Applicant's Response
	Some consideration as to the surface of the diverted section of the path would be required. 5. *Regarding the temporary diversion itself, similar to what was stated above, agree with the proposed diversion in Schedule 6 of the dDCO as a mitigation measure for the route instead of a closure, however, would recommend that the diversion area is to the north rather than to the south of the route. The area marked as a potential diversion area is also similarly very large. It would be good to get some agreement here over what the diversion will be, or at least to agree that the diversion needs to be the shortest route practicable and conforms to the general desire line.* 6. *Brampton PF66/Morton PF66 crosses blue land and should be retained/reserved upon completion of the construction. Level of usage is unknown without census data, but the existence of a footway on the A156 Gainsborough Road back to the village makes this a credibly valued daily circular walk. The existence of a car parking option at Gainsborough Road would see drive to dog walk use being foreseeable.* 7. *Have concerns about this route being proposed to be temporarily stopped up under the dDCO without a corresponding alternative diverted route as it is likely to be a popular route. Suggest that the temporary stopping up is reconsidered, or an alternative diverted route be planned as part of the construction works."*	6. Mton/66/4 and Bram/66/1 are existing footpaths. The draft DCO does not include any power for the Applicant to permanently stop up any PRoW. The Applicant confirms that these footpaths will remain in place following completion of the Scheme. Please also refer to the Applicant's response to point 7. 7. Paragraph 3.12 of the **outline Public Rights of Way Management Plan (oPRoWMP) [EX3/WB6.3.14.3_B]** confirms that it is not anticipated that any temporary PRoW diversions will be required. Mton/66/4 and Bram/66/1 cross the Cable Route Corridor within the Order limits. There is not enough room within the Order limits in this area to provide for a diversion area. However, as confirmed in paragraph 3.13 of **[EX3/WB6.3.14.3_B]**, where a temporary closure is required for the installation of underground cables, work will be undertaken overnight so far as is practicable, minimising the impact on users. In the event these PRoW do need to be temporarily closed, this would be required only whilst the cable is installed in this area, following which the PRoW would be reopened for use.

LIR Ref.	Summary	Applicant's Response
LCC 9.18	*"There are no current applications to add a path to the definitive map over the land identified for the proposed development, however, there is potential for future applications to be made, which may impact the development in the future. At this stage the Council are not able to assess any merits of any potential future application or any strategic benefits and accordingly the Council cannot currently advise the best and most acceptable approach towards these."*	The Applicant acknowledges this comment. Please refer to the response to LCC 9.9 / 9.10, point 2 in respect of how the **draft Development Consent Order (revision C provided at Deadline 3) [EX3/WB3.1_C]** may manage PRoW that may be added to the definitive map and statement in the future.
LCC 9.19	*"Whilst there are opportunities for positive impacts associated with the enhancements to existing footpath network there are currently some unresolved issues regarding the necessary works and reinstatement to the existing public footpath network and until these matters are resolved it is considered that the impact on Public Rights of Way is currently negative."*	The Applicant is committed to ensuring the existing PRoW network is enhanced where possible through safeguarding of routes within the Order Limits, supplemented by additional planting. The provision of an additional permissive path is secured through Requirement 17 of Schedule 2 to **WB3.1_C Draft Development Consent Order Revision C** (provided at Deadline 3) **[EN010132/EX3/WB3.1_C]**. PRoWs may be subject to short-term temporary diversions or closures to facilitate cable laying as set out in paragraph 3.13 of **WB6.3.14.3_B ES Appendix 14.3 Outline Public Rights of Way Management Plan [EN010132/EX3/WB6.3.14.3_B]**. All Public Rights of Way on and surrounding the Sites are to remain open during construction where feasible, and all existing Public Rights of Way are to be retained during the Scheme's operational lifetime. A Public Rights of Way Management Plan that is substantially in accordance with the outline **PRoWMP [EN010132/EX3/WB6.3.14.3_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 **WB3.1_C**

LIR Ref.	Summary	Applicant's Response
		Draft Development Consent Order Revision C (provided at Deadline 3) **[EN010132/EX3/WB3.1_C]**. Please also refer to the Applicant's response to question 1.14.17 in the **Applicant's Response to the First Written Questions [EX3/WB8.1.21]**.
2.16	**Socio-Economics, Tourism and Recreation**	
WLDC 9.1	WLDC raise the following issues with the Socio-Economic, Tourism and Recreation chapter of the ES: 1. It is questioned how the Scheme will identify the required workforce given the level of resource needed to deliver all the schemes at the same time. 2. It is questioned that once the operation period has started and noting the applicants recognition that there will be a long-term impact on the landscape character, whether it has been assessed about the loss in long-term loss for the tourism economy. 3. The long-term impacts on the landscape character of some tourism and recreation receptors are recognised during the operational phase. Thus, the maximum long-term moderate-minor adverse effect on the desirability of local tourist attractions and recreation centres in the Local Impact Area could lead to a proportional maximum long-term moderate-minor adverse effect on the local tourism industry and economy. Should the other solar schemes in the area be consented, it is considered	1. The Applicant has assessed the quantum of construction workers required for the Scheme individually and cumulatively in Sections 18.7 and 18.10 of **WB6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-056]** respectively, and has considered the likely proportion of those to be found from within the Local Impact Area, and wider Regional Impact Area. Cumulatively, the Schemes are likely to have a significant beneficial effect on construction employment, as the construction employment is estimated to be 24.4% of the construction employment workforce in the Local Impact Area (see para. 18.10.9). To support this, Sections 5.3 and 5.4 of **WB7.10 Skills Supply Chain and Employment Plan [APP-319]** outline the measures the Scheme is taking to maximise opportunities for sourcing local employment, recruitment and supply chains. These measures are secured by Requirement 20 of Schedule 2 to **3.1_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C].** 2. The Applicant has estimated a worst-case 1% loss in visitor spending per annum during the operational life of the Scheme. The resultant impact on the tourism and recreation employment and economy has been assessed at paragraphs 18.7.80 and 18.7.97 of **6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism**

LIR Ref.	Summary	Applicant's Response
	that this impact will be amplified as large areas of West Lindsey will be characterised by solar farms. 4. There will be a loss of approx. 13 agricultural sector jobs and it is difficult to determine whether these jobs would realistically return following a 40 year gap in employment. 5. It is assumed that the 13 agricultural sector jobs that have been identified by the Applicant are linked to the four farm businesses within the Order Limits referred to in Chapter 19: Soils and Agriculture (Doc. Ref. EN010132/APP/WB6.2.19) however, the Applicant does not appear to provide a breakdown of the agricultural sector jobs that will be lost. This differs from the Cottam application which shows a clear breakdown of the workers for each business. Moreover, there is no reference to any contractor related services to the farm. Therefore the breakdown of the jobs lost as a result of the scheme is not clear. 6. It is questioned whether the impacts on long-term indirect agricultural job losses have been considered accurately. It is likely that these skills could be lost forever from the local area which is agricultural and rural in nature at present. 7. There is a concern that the BESS within West Burton 3 could cause fire hazards to the local populace both	**and Recreation [APP-056]** as inducing a loss of approximately 5 FTE jobs, and a loss of £240,000 GVA per annum to the tourism and recreation economy. This is assessed to be a long-term minor adverse effect both in respect of employment, and economic performance, and therefore neither are a significant effect. 3. The Applicant has included an assessment of the cumulative effects on tourism and recreation receptors at paragraphs 18.10.51-55 of **6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]**. This demonstrates that while there is anticipated to be a greater level of adverse impact cumulatively than when considering the Scheme in isolation, the cumulative impact on the landscape context for tourism and recreation receptors is not significant as there is no change to the level of significance of effect to tourism and recreation receptors. The cumulative employment and economic impact of the cumulative loss of tourism spending has been assessed at paragraph 18.10.48 of Chapter 18 **[APP-056]** as a loss of £1.1 million per annum, and as such is a cumulative long-term moderate-minor adverse effect. The employment loss of 24 FTE jobs as a result of this is assessed at paragraph 18.10.38 of Chapter 18, and is concluded to be a minor adverse effect. 4. The Applicant has assessed a worst-case loss of 13 FTE agricultural jobs as a result of the Scheme, based on the total number of employees working at the four farm businesses that cover the Scheme, as identified in Section 7 of **WB6.3.19.1 ES Appendix 19.1 Agricultural Land Quality Soil Resources and Farming Circumstances [APP-137]**. Based on the requirement for the land to be reinstated to its present use and condition after decommissioning

LIR Ref.	Summary	Applicant's Response
	directly from fires and also the impact on air quality for the local populace. 8. The Applicant recognises that there will be an estimated "1% drop in visitor spending per annum". However, it does not appear that there is any explanation for this. 9. There are also discrepancies between the assessment of cumulative effects identified in Chapter 18 of the West Burton ES, and the effects identified in the Socioeconomic chapters for the other cumulative schemes. 10. The Applicant states that the "analysis of accommodation units shows that accommodating the anticipated temporary employee requirement could be achieved within the usual unfilled capacity across the entirety of the anticipated 25-month construction period. As such, it is not anticipated that usual visitors or users of temporary accommodation would be displaced". This differs from the assessment in the Cottam Scheme where there is considered to be a level of oversubscription. As the two schemes differ, it is not understood whether a cumulative assessment has been	of the Scheme, it would be expected that a similar level of employment would be required to farm the land once agricultural uses recommence on the land in full. The Applicant does note, however, that once the decommissioning of the Scheme is complete, the Applicant is not anticipated to retain any control over how the land is used. 5. A detailed breakdown of the time of agricultural employment, including contractors on the four farm business on the Scheme sites has been provided at Section 7 of **6.3.19.1 Environmental Statement - Appendix 19.1 Agricultural Land Quality, Soil Resources and Farming Circumstances Report [APP-137]**. As has been undertaken in the assessment of employment loss for Cottam Solar Project [EN010133/APP-145], the FTE of all agricultural workers has been included to determine the worst-case loss of 13 FTE agricultural employees as a result of the Scheme. 6. The Land Use in England 2022[2] statistics show that 97,815 hectares in West Lindsey are agricultural land. The Scheme Sites cover an area of 769ha (excluding the Cable Route Corridor). Cumulatively, West Burton Solar Project, Cottam Solar Project, Gate Burton Energy Park, and Tillbridge Solar cover approximately 3,900ha of agricultural land. This is equivalent to 0.8% (West Burton) and 4.0% (cumulatively) of the agricultural land in West Lindsey. It is assumed that agricultural use is likely to continue on the majority of the remaining 96.0% of land, and as such, there is not likely to be a significant skills deficit in

[2] Department for Levelling Up, Housing and Communities (2022). Official Statistics: Land use in England, 2022. Available at https://www.gov.uk/government/statistics/land-use-in-england-2022

LIR Ref.	Summary	Applicant's Response
	undertaken to consider all of the solar schemes being constructed at the same time.	agriculture as a result of the Scheme or cumulative NSIPs in the West Lindsey district. 7. The Applicant has submitted a revised **WB7.9_A Outline Battery Storage System Management Plan (OBSSMP) [EN010132/EX3/WB7.9_A]** 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). Production, approval and implementation of a final Battery Storage System Management Plan is secured via requirement 6 of Schedule 2 to the **3.1_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C]**. Prior to approving the Plan, the relevant planning authority must consult with (among others) the Lincolnshire Fire and Rescue Service and the Nottinghamshire Fire and Rescue Service. 8. The judgement that there will be a loss of 1% of annual visitor spending is based on professional judgement of the likely impact on spending as a result of the Scheme and its impact on landscape character, tourism attraction, and key visitor spending locations in the Local Impact Area. Consideration of the land area of the Local Impact Area likely to be affected by the Scheme in combination with the negligible impact on key tourism attractions as identified at paragraph 18.7.102 of ES Chapter 18 **[APP-056]**. The 1% figure is also consistent with the magnitude of change classifications as set out in Table 18.4 of Chapter 18 **[APP-056]**, in that the changes are likely to have a low overall impact on the desirability of the Local Impact Area for tourists and visitors (see paragraph 18.7.106 of Chapter 18 **[APP-056]**).

LIR Ref.	Summary	Applicant's Response
		9. The socio-economics assessments reported in the Environmental Statements for the Cottam, West Burton and Gate Burton schemes have been undertaken independently. Appendix E of the updated **WB8.1.9_B Joint Report on Interrelationships between Nationally Significant Infrastructure Projects [REP2-010]** summarises the respective findings. 10. A cumulative assessment of construction impacts on temporary accommodation has been undertaken, as set out in paragraph 18.10.12 of Chapter 18 **[APP-056]** which estimated cumulative construction worker requirements for accommodation may result in a peak 38.0% displacement of usual visitor accommodation uptake. The resultant peak loss of visitor spending is assessed to have a peak cumulative medium-term temporary moderate-minor adverse effect on grouped tourism and recreation (RSTU) sector employment (see paragraph 18.10.13 of Chapter 18 **[APP-056]**) and a peak cumulative medium-term temporary moderate adverse effect to the tourism and recreation economic sector (18.10.25 **[APP-056]**). This is therefore a significant adverse effect in EIA terms, albeit over a temporary period.
WLDC 9.11 to 9.13	WLDC identify the following positive impacts during construction: 1. Construction will generate temporary employment of approx. 615 FTE jobs per annum. 2. Inbound of construction workers has the potential to increase accommodation occupancy rates and	The Applicant agrees that the Scheme will bring about these beneficial impacts during construction. These have been assessed in **6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-056]** at the following paragraphs: 1. 18.7.11; 2. 18.7.17; and 3. 18.7.37.

LIR Ref.	Summary	Applicant's Response
	provide additional 56FTE employees per annum in the accommodation employment sector. 3. Should the uplift in workforce be required to find permanent accommodation, this would likely equate to approximately 79 FTE employees per annum.	
WLDC 9.14 to 9.16	WLDC identify the following neutral impacts during construction: 1. It is not anticipated that construction will displace any usual visitors. 2. The uplift of 550 workers to the 2,204,000 working population represents a negligible (0.02%) positive impact to a low sensitivity receptor, thus having an overall long-term negligible beneficial effect on the labour force. 3. The anticipated uplift in population is anticipated to be negligible in magnitude, at both level of the Local and Regional Impact Areas.	The Applicant agrees that the Scheme will bring about these neutral impacts during construction. These have been assessed in **6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-056]** at the following paragraphs: 1. 18.7.33; 2. 18.7.24; and 3. 18.7.27.
WLDC 9.17 to 9.26	WLDC identify the following negative impacts during construction: 1. The projected uplift of 0.04% to the residential population in the Local Impact Area represents a medium-term temporary negligible magnitude impact with regard to the number of people requiring access to local services including primary health services.	The Applicant notes that these comments reflect the assessment provided in **6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-056]**. The assessment of these effects is found at the following paragraphs: 1. 18.7.28; 2. 18.7.41; 3. 18.7.42; 4. 18.7.42;

LIR Ref.	Summary	Applicant's Response
	2. The additional traffic loads on the highway network have been assessed as having negligible impact (ES Chapter 14). However, working commuting patterns are of a medium sensitivity to change. The impact on existing commuters is therefore a medium-term minor adverse effect. 3. The movement of construction works traffic have been assessed as having up to minor negative impact on accessibility and delay for pedestrian and cycles once embedded mitigation is implemented. This could therefore have a minor, localised delay on local movements (for work, school, accessing localised services). 4. The presence of construction traffic on local routes may cause a moderate, localised fear and intimidation impact which may negatively impact the desirability of walking, running and cycling along local routes, thus having a medium-term moderate-minor adverse effect on health and wellbeing. 5. ES Chapter 8 identifies that a result of construction some of the receptors have up to high negative impact on their visual setting. This is likely to have up to a peak moderate adverse effect on the tourism value of these locations. These peak effects are significant. 6. Without additional mitigation, the greatest effect from construction of the Scheme on cultural	5. 18.7.57; 6. 18.7.58; 7. 18.7.62; 8. 18.7.63; 9. 18.7.65; 10. 18.7.69; and 11. 18.8.70. The Applicant reiterates that the effects are temporary and not significant in EIA terms.

LIR Ref.	Summary	Applicant's Response
	heritage assets is a moderate adverse on one designated asset (the mediaeval bishop's palace and deer park, Stow Park Scheduled Monument), and up to major adverse on two non-designated assets. This therefore can be attributed as having a medium magnitude impact on these assets for tourism and visitors. Although some of the identified effects are significant, the number of identified landscape and heritage tourism receptors that are likely to be adversely affected by the Scheme's construction are likely to have a low overall impact on the desirability of the Local Impact Area for tourists and visitors. Resultantly, the effect on local tourism attractions in the Local Impact Area is minor adverse. 7. The greatest effects on the use, accessibility, and desirability of Public Rights of Way are moderate minor adverse effects. The greatest level of effects on high sensitivity long-distance recreational routes are moderate adverse effects. These are therefore significant. 8. there are up to moderate-minor adverse effects on pedestrian and cycling traffic as a result of fear and intimidation from construction vehicle movements. Whilst all of these routes are highways, they are important as links connecting the PRoW network to nearby settlements and are therefore important to	

LIR Ref.	Summary	Applicant's Response
	be considered as part of the assessment of effects on recreational routes. 9. Fishing locations on the River Till at Saxilby are likely to experience mid-range views of construction works at West Burton 1 and 2, thus there may be up to a low magnitude impact on the use of this location. As a result of its local level of importance, and thus a low sensitivity, this will therefore have a medium-term temporary minor adverse effect. 10. At worst, it can be anticipated that construction traffic has an up to low-level impact on the accessibility of some of the local recreation areas, particularly where users may have to use routes allocated for construction traffic. As a result, this could generate up to a moderate-minor adverse effect on the accessibility of recreational facilities for children and youth groups. 11. As a result of the identified direct impacts on tourism and recreation receptors in the Local Impact Area, there are likely to be secondary impacts on local businesses that are reliant on tourism. The predominantly moderate-minor adverse effect on the desirability of local tourist attractions and recreation centres could lead to moderate-minor adverse effect on the local tourism industry and economy during the Scheme's construction.	

LIR Ref.	Summary	Applicant's Response
WLDC 9.27 to 9.28	WLDC identify the following positive impacts during operation: 1. The employment generated by the Scheme's operation and maintenance is equivalent to approximately 25 FTE jobs per annum. 2. Net direct employment uplift of 6 workers in the context of approximately 320 sector workers in the Local Impact Area represents a 1.9% increase from 2021 levels, resulting in long-term moderate-minor beneficial effect.	The Applicant agrees that the Scheme will bring about these beneficial impacts during its operation. These have been assessed in **6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-056]** at the following paragraphs: 1. 18.7.74; and 2. 18.7.75.
WLDC 9.29 to 9.32	WLDC identify the following negative impacts during operation: 1. Loss of 13 FTE agricultural jobs results in a long-term minor adverse effect. In the Regional Impact Area, this is a 0.03% reduction in agricultural employment representing a negligible change to a receptor of low sensitivity. The effect is long-term negligible adverse. 2. Displacement of 13 agricultural jobs will have an economic impact of £600,00 and reduce the vale of the local agricultural economy by approx. 0.2% resulting in a long-term minor adverse impact and long-term negligible adverse effect in the Regional Impact Area. 3. 1% fall in visitor spending represents a loss of 0.3% loss in tourism sector resulting in a long-term minor	The Applicant agrees that the Scheme will bring about these adverse impacts during its operation. These have been assessed in **6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-056]** at the following paragraphs: 1. 18.7.15; 2. 18.7.48 3. 18.7.97; and 4. 18.7.116. The Applicant reiterates that whilst these impacts are long-term during the Scheme's operational phase, these are not significant.

LIR Ref.	Summary	Applicant's Response
	adverse effect. At regional level, the loss of arts, entertainment and recreation sector is equivalent to 0.008% of the regional economic sector value result in a long-term negligible effect of the Regional Impact Area. 4. Long-term impact on the landscape character of some tourism and recreation receptors that are reliant on the landscape context for their value will have secondary impacts on local businesses relying on tourism. the maximum long-term moderate-minor adverse effect on the desirability of local tourist attractions and recreation centres in the Local Impact Area could lead to a proportional maximum long-term moderate-minor adverse effect on the local tourism industry and economy.	
WLDC 9.33 to 9.35	WLDC identify the following positive impacts during decommissioning: 1. Net uplift of 114 workers (2.4%) in construction employment will result in medium-term temporary moderate-beneficial effect. The direct uplift of 148 workers is a 0.1% increase in the Regional Impact Area resulting in medium term temporary minor beneficial effect. 2. Reinstatement of 13 FTE agricultural jobs will result in minor beneficial effect in the Local Impact Area	The Applicant agrees that the Scheme will bring about beneficial impacts during decommissioning. These have been assessed in **6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-056]** at the following paragraphs: 1. 18.7.122; 2. 18.7.124; and 3. 18.7.125.

LIR Ref.	Summary	Applicant's Response
	and permanent negligible beneficial effect at regional level. 3. Temporary uplift in accommodation will increase occupancy rates and sector workers amounting to medium-term temporary beneficial effect and medium-term temporary minor beneficial effect in the Regional Impact Area.	
WLDC 9.36	WLDC identify the following neutral impacts during decommissioning: *"Following completion of the decommissioning phase, employment will return to near baseline levels. This will therefore represent a permanent minor beneficial effect to the Local Impact Area, and a permanent negligible adverse effect to the Regional Impact Area."*	The Applicant considers the return of employment levels to near baseline levels at the conclusion of decommissioning to be a minor beneficial effect, as assessed at paragraph 18.7.130 of in **6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-056]**.
WLDC 9.37 to 9.38	WLDC identify the following negative impacts during decommissioning: 1. The energy sector will experience a permanent decline in employment. 2. The loss to the Local Impact Area of 8 FTE employees is a 2.4% reduction, representing a moderate-minor adverse effect and permanent negligible adverse effect at regional level. 3. Tourism destinations are likely to experience medium-term negligible negative impact.	The Applicant agrees that the Scheme will bring about adverse impacts during decommissioning. These have been assessed in **6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-056]** at the following paragraphs: 1. 18.7.123; 2. 18.7.122; and 3. 18.7.122. The Applicant reiterates that the impacts are not significant. Furthermore, the medium-term negligible adverse impact on tourism destinations will be followed by permanent minor beneficial effect once the land has been returned to agricultural use.

LIR Ref.	Summary	Applicant's Response
WLDC 9.42 to 9.44	WLDC identify the following cumulative positive impacts during construction: 1. Accounting for "leakage" of commuters from outside the Local Impact Area, and existing employment displacement, the peak net uplift in construction employment in the Local Impact Area is 1,160 FTE employees in 2026. This represents an increase of 24.4% (from 4,750) in construction employment which is of high magnitude. 2. The peak cumulative net uplift in construction employment in the Local Impact Area is likely to generate a peak GVA in 2026 of £63.0 million. This represents an increase of 24.4% to the local construction economy, which is of high magnitude. The £87.4 million increase to the construction economy in the Regional Impact Area represents a 1.3% uplift. 3. The total peak cumulative economic impact of the assessed projects in the year 2026 is a GVA uplift of £161.4 million, representing a 4.5% increase to the £3.6 billion economy of the Local Impact Area. The peak cumulative GVA uplift of £217.3 million to the Regional Impact Area is an uplift of 0.2%.	The Applicant agrees that there is anticipated to be these beneficial cumulative impacts during construction. These have been assessed in **6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-056]** at the following paragraphs: 1. 18.10.9; 2. 18.10.22; and 3. 18.10.26.
WLDC 9.45	WLDC identify the following cumulative neutral impacts during construction: "*the peak level of accommodation needed for temporary construction workers is likely to exceed accommodation surplus, thus displacing up to a peak of 38.0%*	The Applicant agrees that there is anticipated to be a cumulative neutral impact during construction as assessed in paragraph 18.10.12 of **6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-056]**.

LIR Ref.	Summary	Applicant's Response
	of the usual number of visitors using accommodation in the Local impact Area. This however is not likely to have a direct impact on employment in the accommodation sector. As such, these impacts are likely to remain neutral in both the Local and Regional Impact Areas."	
WLDC 9.46 to 9.50	WLDC identify the following cumulative negative impacts during construction: 1. The anticipated cumulative effect of the cumulative projects on the agricultural economy is a peak loss of approximately 38 FTE workers by 2026. This is a 1.0% loss to the level of agriculture employment in the Local Impact Area. 2. The displacement of visitors is likely to lead to a loss of visitor spending as a result of displacement from accommodation, and the secondary impacts of the cumulative projects on local desirability for tourism and recreation, are likely to result in a reduction of 246 FTE employees in the grouped tourism and recreation (RSTU) employment sector. This represents a 7.0% loss of employment in the Local Impact Area. 3. The projected 0.3% uplift to the residential population in the Local Impact Area is likely to induce a peak cumulative medium-term temporary minor adverse effect in the number of people requiring access to primary health services. This could therefore have a secondary peak cumulative	The Applicant agrees that there is anticipated to be adverse cumulative impacts during operation. This has been assessed in **6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-056]** at the following paragraphs: 1. 18.10.10; 2. 18.10.13; 3. 18.10.16; 4. 18.10.25; and 5. 18.10.32. The Applicant reiterates that these effects are not significant.

LIR Ref.	Summary	Applicant's Response
	medium term temporary moderate minor adverse effect on general population health and wellbeing, and a peak cumulative medium-term temporary minor adverse effect on disability and long term health in the local population as a result of reduced accessibility to local healthcare services. 4. The greatest level of economic impact to tourism and recreation, most likely to be felt in the arts, entertainment, and recreation grouped sector, is estimated to be a loss of £11.0 million. This is likely to be as a result of visitor spending reduction as a result of displacement from accommodation. This loss amounts to a high magnitude 14.5% reduction in the economic sector in the Local Impact Area. The loss to the economic sector in the Regional Impact Area is low at 0.4%. 5. Of the Public Rights of Way and long-distance recreation routes assessed, the Trent Valley Way and National Byways Cycle Route are likely to see the greatest level of cumulative impact. These cumulative impacts are as a result of direct impacts from cable routes crossings and visual impacts from the multiple projects nearby or adjacent to the variant routes of both these long-distance recreation routes. In a worst-case scenario, construction of the cable routes of the identified projects may run sequentially over a five-year period, requiring the Trent Valley Way to be closed	

LIR Ref.	Summary	Applicant's Response
	three times during this. Similarly, the National Byways route from Sturton le Steeple to Bole may need to be closed for an extended time to facilitate the cable connection from Bumble Bee Farm to its connection point.	
WLDC 9.51 to 9.52	WLDC identify the following cumulative positive impacts during operation: 1. The cumulative annual economic impact of the assessed projects during the combined operational phase is a GVA uplift of £6.3 million per annum, representing a 0.2% increase to the Local Impact Area's economy. The cumulative net GVA uplift in the Regional Impact Area is estimated at £7.2 million per annum, indicating a 0.007% increase to the regional economy. 2. The total peak cumulative 0.2% increase in the GVA of the local economy will amount to a maximum uplift of £77 GVA per worker per annum in the Local Impact Area from the 2020 baseline.	The Applicant agrees that there are anticipated to be beneficial cumulative impacts during operation. This has been assessed in **6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-056]** at the following paragraphs: 1. 18.10.49; and 2. 18.10.50.
WLDC 9.53 to 9.58	WLDC identify the following cumulative negative impacts during operation: 1. Net loss of 66 FTE jobs per annum in the energy sector, accounting for leakage and displacement factors and the 125 energy sector jobs lost as a result of the closure of West Burton A. This represents a decrease of 20.5% in energy	The Applicant agrees that there is anticipated to be adverse cumulative impacts during operation. This has been assessed in **6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-056]** at the following paragraphs: 1. 18.10.35; 2. 18.10.36;

LIR Ref.	Summary	Applicant's Response
	employment in the Local Impact Area from the 320-worker baseline and is a cumulative long-term moderate adverse effect. At the regional level, the magnitude of impact (a loss of 66 FTE employees per annum in a pool of approximately 12,000) is low (0.5%), and as such is a cumulative long-term minor adverse effect. 2. Continual loss of approx. 38 FTE workers in the agricultural economy until 2063 and results in a cumulative long-term moderate-minor adverse effect in the Local Impact Area. 3. Cumulative net employment loss of 63 FTE worker per annum will result in long-term moderate-minor adverse effect on access to employment in Local Impact Area. 4. The net decrease in energy employment is likely to generate a cumulative GVA loss of £3.2 million per annum. This represents a loss of 1.2% to the agriculture, mining, electricity, gas, water and waste (ABDE) grouped sector economy, which is of a medium magnitude. This is therefore a cumulative long-term moderate-minor adverse effect in the Local Impact Area. In the Regional Impact Area, this loss of GVA to the ABDE grouped sector economy is equivalent to 0.06%, and therefore represents a cumulative long-term negligible adverse effect.	3. 18.10.44; 4. 18.10.46; 5. 18.10.48; and 6. 18.10.51. The Applicant reiterates that these effects are not significant.

LIR Ref.	Summary	Applicant's Response
	5. Cumulative level of economic impact to tourism and recreation, as a result of reduced desirability of the Local Impact Area for tourism, is most likely to be felt in the arts, entertainment, and recreation grouped sector. The estimated worst-case cumulative economic effect is a loss of £1.1 million GVA per annum. As such is a cumulative long-term moderate-minor adverse effect in the Local Impact Area. 6. The cumulative construction phase impacts from the assessed projects are very likely to have a somewhat increased level of effect on tourism and recreation in the immediate locality and Local Impact Area. These include the impacts to the economy already explored, as well as the further economic impacts as a result of cumulative landscape and traffic impacts. The resultant changes are therefore likely to affect the desirability and accessibility of tourism and recreation routes, attractions, and facilities.	
LCC 13.12	*"Four farm businesses are identified to manage the land within the site. All are owners of the land occupied and all own and occupy additional land outside of the site area. Each unit is described in summary with the stated impact, but that income from the solar farm would more than compensate for the loss of mainly arable farm land."*	The Applicant notes this comment.

LIR Ref.	Summary	Applicant's Response
2.17 Soils and Agriculture (Including Land Use)		
WLDC 12.1	WLDC raise the following points arising from the review of the Soils and Agriculture chapter of the ES: 1. *"Table 19.11 (Summary of Potential Effects and Residual Effects): The residual effect of loss of land to farm businesses being Minor (should be slight). These construction effects will last for 40 years, until decommissioning, and they appear to understate what would be a significant adverse effect on the operation of these farms for biomass production (combinable crops and grass).* 2. *IEMA Guidance has been utilised for assessing impact on agricultural holdings. However, the publication is principally concerned with soil functions and does not provide methodology for assessing impacts on agricultural holdings.* 3. *It is not clear if any tenants are displaced, if so, this would be an additional socio economic adverse effect.* 4. *The cumulative assessment is based on the absence of site-specific assessments which are required to determine Agricultural Land Classification (ALC)."*	1. The Construction Effect on the Farm Businesses is the temporary curtailment of agricultural income from the land for the period of construction activity (see paragraph 19.9.9 of **ES Chapter 19 Soils and Agriculture [APP-057]**). This construction effect will not last 40 years. The Operational Effect on the Farm Businesses is also assessed. This will last for the duration of the operational phase (40-60 years). As shown on Table 19.11 **[APP-057]** this is a moderate beneficial effect as each farm business benefits from a significant new diversified enterprise. 2. As noted in paragraphs 19.2.23 and 19.6.8 of **6.2.19 ES Chapter 19: Soils and Agriculture [APP-057**], the current IEMA guidance continues the guidance on farming circumstances that was previously provided in PPG7 and the Design Manual for Roads and Bridges. There is no alternative guidance giving a more structured methodology for the assessment of effects upon farm business. The guidance identifies important considerations for economic and social effects for agriculture, and is not limited to soil functions. 3. Paragraph 7.1.1 of **6.3.19.1 ES Appendix 19.1: Agricultural Land Quality, Soil Resources and Farming Circumstances Report [APP-137]** notes that all four agricultural occupants within the sites are the owners and occupiers of that land. No agricultural tenants will be displaced by the Scheme. 4. The cumulative assessment was undertaken using the best available published information on ALC grade at the time as explained in paragraph 19.11.5 of the **6.2.19 ES Chapter 19: Soils and**

LIR Ref.	Summary	Applicant's Response
		Agriculture [APP-057]. The proportion of ALC land used for the cumulative assessment was taken from the planning applications where possible. Two schemes have not submitted planning applications, and a predictive BMV Land assessment was used. The Applicant considers that the cumulative assessment is robust and uses the best available information in respect of all cumulative projects, including site-specific assessments where these were carried out as part of the application for those other schemes. Paragraph 19.11.7 confirms that there will be no permanent loss of agricultural land resource for the cumulative sites.
WLDC 12.13 WLDC 12.14	*"No positive impacts on agricultural land during construction have been predicted in the ES, and would not be expected, as construction works are generally disruptive in nature.* *There are no neutral impacts identified during construction."*	The Applicant notes these comments. Table 19.11 of **6.3.19.1 ES Appendix 19.1: Agricultural Land Quality, Soil Resources and Farming Circumstances Report [APP-137]** confirms that there are no likely significant effects to soils receptors from the construction of the Scheme.
WLDC 12.15 to 12.17	WLDC identify the following negative impacts during construction: 1. *"Construction work will start the temporary curtailment of arable production within the Site. The land does not cease to be agricultural land whilst cropping or grazing is suspended while construction work is taking place and there is no actual loss of agricultural land resource, therefore no mitigation is proposed. The residual effect of construction on the agricultural land resource is considered minor and not significant.* 2. *The Soil Management Plan (SMP) (outline SMP provided in EN010132/APP/WB6.3.19.2) is embedded mitigation*	The Applicant responds to the following matters raised by WLDC relating to Soils effects during the construction phase of the Scheme: 1. The Applicant acknowledges that this comment is extracted from paragraphs 19.9.1, 19.10.2 and 19.10.5 of **6.2.19 ES Chapter 19: Soils and Agriculture [APP-057]**; 2. The Applicant acknowledges that this comment is extracted from paragraphs 19.10.3 and 19.19.8 of **6.2.19 ES Chapter 19: Soils and Agriculture [APP-057]**; 3. The Applicant acknowledges that this comment is extracted from paragraphs 19.9.1 and 19.9.10 of **6.2.19 ES Chapter 19: Soils and Agriculture [APP-057]**.

LIR Ref.	Summary	Applicant's Response
	that aims to conserve the soil resource through construction activity and therefore no additional mitigation is proposed. The resulting short term, reversable and local effect of construction disturbance on the soil resource across the Scheme is considered minor and not significant. 3. *The temporary curtailment of farming practices for each of the four farming businesses will result in a reduction in cropped area for these enterprises. This is considered as a constraint however farming practices will not be entirely terminated for these businesses – only the land that is occupied by the Scheme."*	
WLDC 12.18 to 12.20	WLDC identify the following positive impacts during operation: 1. *"Whilst the Scheme is operational, the soil resource will remain under a perennial green cover, providing several benefits, including:* • *There will be no bare soil surfaces that could be vulnerable to wind and water erosion;* • *Improved infiltration of water, reducing erosive surface water runoff;* • *Greater exploitation of subsoil by plant roots – improving drainage and loosening compacted soils; and*	The Applicant responds to the following matters raised by WLDC relating to Soils effects during the construction phase of the Scheme: 1. The Applicant acknowledges that this comment is extracted from paragraph 19.9.13 of **6.2.19 ES Chapter 19: Soils and Agriculture [APP-057]**. 2. The Applicant acknowledges that this comment is extracted from paragraphs 19.9.15 and 19.9.17 of **6.2.19 ES Chapter 19: Soils and Agriculture [APP-057]**. 3. The Applicant acknowledges that this comment is extracted from paragraphs 19.9.18, 19.9.19 and 19.9.20 of **6.2.19 ES Chapter 19: Soils and Agriculture [APP-057]**.

LIR Ref.	Summary	Applicant's Response
	• *Recovery of topsoil organic matter – improving stability, water holding capacity, plant nutrient availability and the ability to absorb carbon.* 2. *The recovery of soil organic matter under an extended fallow period will produce a medium term, reversable, local moderate beneficial impact, which is a significant beneficial effect.* 3. *During operation, grass below the solar panels will need to be managed, which can be achieved by the grazing of livestock (e.g. sheep). All four farm businesses impacted by the Scheme will receive some income from the Scheme's occupation of their land, providing a new diversified enterprise and a new income stream that is independent of variations in profitability of arable production. Therefore, no mitigation is proposed. The transfer of arable land to new a diversified enterprise will produce a moderate impact, which is a significant beneficial effect for the medium term."*	
WLDC 12.21	*"There are no neutral impacts identified during construction."*	The Applicant notes this comment. Table 19.11 of **6.3.19.1 ES Appendix 19.1: Agricultural Land Quality, Soil Resources and Farming Circumstances Report [APP-137]** confirms that there are no likely significant effects to soils receptors from the construction of the Scheme.
WLDC 12.22	*"There will be no loss of agricultural land resource during operation. With no change there is no mitigation proposed and*	The Applicant notes this summary by WLDC of parts of the **6.2.19 ES Chapter 19: Soils and Agriculture [APP-057]**. Relevant paragraph includes 19.9.12.

LIR Ref.	Summary	Applicant's Response
	there will be a negligible impact, which is not considered significant."	
WLDC 12.23	*"Decommissioning of the Scheme will allow a return to arable management of the land. The resulting short term, reversable and local effect of decommissioning on the return of agricultural land to the enterprises of the occupying farm businesses will be a minor impact, beneficial and not significant. No further mitigation is proposed."*	The Applicant notes this summary by WLDC of parts of the **6.2.19 ES Chapter 19: Soils and Agriculture [APP-057]**. Relevant paragraphs include 19.9.28 and 19.9.30.
WLDC 12.24	Decommissioning: *"It is noted that there is an intention to return the land to agricultural land. No obstructions will be left in the soil that could interfere with cultivation (e.g. cables will be removed) and no changes to the physical characteristics of the soil will have taken place that could influence ALC grade. There will be a negligible impact, which is not considered to be significant."*	The Applicant notes this summary by WLDC of parts of the **6.2.19 ES Chapter 19: Soils and Agriculture [APP-057]**. Relevant paragraphs include 19.9.21 and 19.9.23.
WLDC 12.25	*"Decommissioning will involve activities similar to that during construction, including trafficking the land in a similar manner to the current arable land use (e.g. combine harvesters). The measures from the SMP also extend to decommissioning and land restoration and it will limit impacts to the soil resource. The SMP covers the appropriate handling of stored soil, aftercare of the land and identification of remediation of any areas of compacted soils. The resulting residual impacts will be short term, reversable and localised, which is considered to be a minor impact that is not significant."*	The Applicant notes this summary by WLDC of parts of the **6.2.19 ES Chapter 19: Soils and Agriculture [APP-057]**. Relevant paragraphs include 19.9.24, 19.9.25 and 19.9.27.

LIR Ref.	Summary	Applicant's Response
WLDC 12.26 to 12.28	WLDC make the following comments in relation to cumulative impacts: 1. *"During construction, residual effects regarding the loss of agricultural land resource, loss and degradation of the soil resource, and loss of land to farm business and disruption to agricultural occupants outside the site are all assessed as minor, not significant.* 2. *During operation, residual effects regarding the loss of agricultural land resource will be negligible, not significant. Effects regarding the recovery of soil health under extended fallow, and new diversified enterprises, will be moderate beneficial, significant.* 3. *During decommissioning, effects regarding the loss of agricultural land resource will be negligible, not significant. Effects regarding the loss and degradation of the soil resource will be minor, not significant. The effects of the return of land to farm businesses will be minor beneficial, not significant."*	The Applicant acknowledges that this summary is extracted from Table 19.11 of **6.2.19 ES Chapter 19: Soils and Agriculture [APP-057]**
LCC 13.12 LCC Appx 2	*"The Council commissioned Landscape to produce a report 'Review of Soils and Agricultural Land Classification(ALC) for West Burton attached at Appendix 2 which provides a detailed review of the impact of the proposal on the agricultural land affected by the proposal."*	The Applicant notes this comment.
LCC 13.12	*"This report notes that previous ALC surveys locally on these soil types and similar have indicated a mixture of mainly 3a and 3b land, with some Grade 2. It is likely that the shallower and*	Natural England retain experienced ALC practitioners who have reviewed the ALC assessment submitted by the Applicant, along with the detailed site survey data. It is on this basis that Natural England have stated that *"Natural*

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	heavier soils are Grade 3b, whilst deeper soils will be Grade 3a or occasionally Grade 2. *In this case it appears that Natural England have accepted the methodology on the basis that the expected level of BMV is mostly low to moderate. The findings of the applicant's ALC report essentially identify around 75% of the site as Grade 3b. The majority of any BMV land is shown in the table below to be Grade 3a, with smaller quantities of Grades 1 and 2."*	*England are satisfied that the detailed ALC survey undertaken across the order limits is appropriate."* **[REP1A-008]**.
LCC 13.12	*"The loss of otherwise productive farmland is not particularly covered in the report on the basis that the majority is not BMV. However is does represent a significant area of land particularly when considering the wider cumulative impact on farmland across Lincolnshire and the larger Gate Burton scheme locally."*	Farmland is not permanently lost to the Scheme. Arable use of the land is temporarily curtailed for the duration of the Scheme; see paragraphs 19.9.1 and 19.9.21 of **6.2.19 ES Chapter 19: Soils and Agriculture [APP-057]**. The land does not cease to be agricultural land if not cropped.
LCC 13.12	*"This part of Lincolnshire is a mainly arable farming area with only limited sheep grazing operations. As such the economics of moving sheep to and from the site will be marginal.* *It is clear that whilst sheep grazing notionally maintains a low level of agricultural use of the site, it is more for the convenience of maintenance than for agricultural production."*	An NSIP solar site offers a significant opportunity to a local farm business seeking to expand or create a sheep grazing enterprise, diversifying the local agricultural economy as well an individual farm business.
LCC 13.12	*"In the context of 60 year lifetime it does result in lost food production not just for 60 years but the additional time the land is out of use for construction, decommissioning and restoration of the land to arable farming."*	Please refer to the Applicant's response to questions 1.2.9 and 1.2.22 of Applicant's Response to the First Written Questions **[EX3/WB8.1.21]**. The measures taken by the applicant to identify and minimise use of BMV land are detailed in the **7.5 Planning Statement [EN010132/ EX3/WB7.5_A]** in section 6.7).

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		A claim of lost food production over the operational phase of the solar farm is not pertinent and would also apply to land uses that are not under planning control such as equestrian or biofuel crops.
LCC 13.12	*"The agricultural use of the land under panels is restricted to essentially one type of farming – grazing sheep. An outbreak of foot and mouth, or blue tongue disease could render the site unusable for grazing. It is not practicable to take hay crops or graze cattle and so the type of agriculture is highly restricted. Possible sheep grazing is no substitute for wheat production."*	Please refer to the Applicant's response to questions 1.2.9 and 1.2.22 of the Applicant's Response to the First Written Questions **[EX3/WB8.1.21]**. The type of current agricultural use or yield are not material planning considerations.
LCC 13.12	*"The Applicant does not consider that the Scheme would result in food security impacts either alone or cumulatively.* *The UK Food Security Report 2021 provides a useful reference for UK food security and is an important document providing context and crucial information for those proposing projects that take significant productive land from production."*	Please refer to the Applicant's response to questions 1.2.9 and 1.2.22 of Applicant's Response to the First Written Questions **[EX3/WB8.1.21]**.
LCC 13.12	*"In respect of the cable routes which have not yet been fully surveyed from the maps available it seems likely that 20-60% of the cable route will be BMV, where any loss is likely to be significant. However, irrespective of the land quality issues, there will be matters of concern to farmers and landowners including:* • *Land drainage* • *Weed burden* • *Biosecurity for plant diseases* • *Timeliness of soil stripping, storage and handling*	The **6.3.19.2 ES Appendix 19.2 Outline Soil Management Plan [APP-138]** describes measures that will be adopted to avoid structural degradation of soil (such as compaction) and retain the functional capacity of the soil for agricultural production. As soil material will not be imported into the cable route, and the cable trench will be back filled with the soil excavated at that location, no issues of crop biosecurity or weed introduction will arise.

LIR Ref.	Summary	Applicant's Response
	• *Compaction of subsoil* • *Re-instatement to previous quality/standard"*	
LCC 13.12	*"Soil structure can be significantly damaged during the construction phase of the process. There is a lot of trafficking of vehicles on the land to erect the panels and if this work is undertaken when soils are wet, there can be significant damage. Much of this damage can be remedied post construction but not all and it is possible that long term drainage issues occur on the site due to the construction."*	Paragraph 3.1.1 of **6.3.19.2 ES Appendix 19.2 Outline Soil Management Plan (oSMP) [EN010132/EX3/WB6.3.19.2_A]** describes measures that will be adopted to avoid structural degradation of soil (such as compaction) and retain the functional capacity of the soil for agricultural production. Paragraph 8.5.2 of the oSMP restricts trafficking of plant and vehicles to when the soil is in a dry, friable condition (being less sensitive than soil in a wet, plastic condition).
LCC 13.12	*"During the construction phase many of the areas will be affected by soil and water issues. A comprehensive Soil Management Plan should be established as part of the Construction Phase, to minimise the impact on soil resources."*	The **6.3.19.2 ES Appendix 19.2 Outline Soil Management Plan [EN010132/EX3/WB6.3.19.2_A]** describes measures that will be adopted to avoid structural degradation of soil (such as compaction) and retain the functional capacity of the soil for agricultural production. The detailed soil management plan will be approved by the relevant planning authority, and is secured by Requirement 19 of the **draft Development Consent Order (Version C provided at Deadline 3) [EX3/3.1_C]**.
LCC 13.12	*"In conclusion for a project of this scale where the project will tie up the land for up to 60 years, there will be some impact. The area is large locally and if the quantities of BMV are as stated then the impact will still be important, even allowing for the proportion of the site that is not classed as BMV."*	There will be no loss of BMV agricultural land extent or degradation of quality resulting from the Scheme.
2.18 Transport and Access		
WLDC 10.1	WLDC summarises the main points arising from the review of the Transport and Access chapter of the Environmental Statement:	1. A number of PRoW within the Sites will be crossed by the proposed access tracks; as set out in **6.3.14.3 Outline Public Rights of Way Management Plan (oPRoWMP) [EX3/6.3.14.3_B],** at paragraph 3.2,

LIR Ref.	Summary	Applicant's Response
	1. No surveys of PROW seem to have been undertaken. The enjoyment of PROW by recreational users will likely be affected by solar arrays during operation, due to visual intrusion, so PROW surveys should be undertaking to establish how many people will be impacted. 2. It is unclear if the potential environmental effects due to any temporary highway works necessary to accommodate access by large construction vehicles and abnormal loads, which may require the removal of hedgerows for example, have been covered by the ES. 3. The traffic survey data used to derive the baseline is from 2017 and 2019, which is before the Covid-19 pandemic restrictions. Nonetheless, this traffic data is now quite historic, with some of the data being more than five years old. Therefore, more recent traffic surveys should be considered to verify that the derived baseline traffic flows are representative of current day conditions. 4. It is noted that deliveries will avoid peak hours where possible; however, no reasons are provided as to why this might not be possible. 5. Collectively the Scheme is proposing 27 access points. This would mean that there would be construction traffic along the route and using the local road network. It is questioned by so many	these will be managed throughout the construction period to ensure safety, but public access will be retained so far as practicable. It is acknowledged that a number of PRoW will be affected during the construction of the cable route corridor. Information on how public rights of way will be managed during the construction of the cable route is set out from paragraph 3.7 **of 6.3.14.3_B ES Appendix 14.3 Outline Public Rights of Way Management Plan (PROWMP) [EX3/6.3.14.3_B]**. Management measures will be in place to ensure the safety of public rights of way users at all times. As set out in paragraph 3.8 of the oPRoWMP, "when the cable is installed, there will be there will be some instances where the PRoW needs to be closed to users for a short period. This will not occur at all PRoWs, as directional drilling will be used in some places. Where there is a requirement to temporarily close the PRoW, works will be undertaken over-night so far as is practicable to do so, when there are unlikely to be any PRoW users. It is anticipated that the installation of cables over short sections where the PRoW is located can be undertaken in a single overnight period. The PRoW will remain open, and managed, during the daytime period so far as is practicable to do so". 2. The environmental effects of the removal of hedgerows is considered in **6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-047].** In certain locations where existing accesses do not exist, some very minor hedgerow removal is necessary to accommodate the access road between fields, land areas and solar panel areas. This removal is set out in **7.3_B Outline Landscape and Ecological Management Plan Revision B [EN010132/EX3/WB7.3_B]** (the 'OLEMP') which is revised and secured by Requirement 7 of Schedule 2 of **3.1 C_Draft**

LIR Ref.	Summary	Applicant's Response
	accesses are needed, particularly as it is suggested an access is needed every kilometre. It is questioned whether more internal accesses could not be utilised. 6. It is noted that there will be 'a small number of abnormal load movements to transport large transformers'; however, exact numbers are not provided. This would be helpful when assessing the cumulative impact of Abnormal Indivisible Loads (AIL) for the other solar schemes. 7. The Scheme states that the shared Grid Connection Route utilises different routes from the other solar schemes. This suggests the cumulative impact of the roads will be felt more widely. 8. WLDC wishes the applicant to provide, within the Outline Construction Traffic Management Plan, the measures to be adopted in event two or more projects are being constructed simultaneously. 9. The construction routes for the Cottam, Gate Burton and West Burton are shown at Appendix D and demonstrates the interconnection with all of the schemes.	**Development Consent Order Revision [EN010132/EX3/WB3.1_C].** 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). These plans also show hedgerow works (pruning and removal) associated with temporary highway works necessary to accommodate access by large construction vehicles and abnormal indivisible load (AIL) requirements. 3. As set out paragraph 14.5.24 of **the 6.2.14 ES Chapter 14 Transport and Access [APP-052]** traffic surveys were undertaken in November 2021. This statement is replicated in Paragraph 2.13 of the **6.3.14.1 A ES Appendix 14.1 Transport Assessment Revision A [REP1-14].** Data for the A15 and A57 is taken from the DfT Road Traffic Statistics database for 2019. At the time of writing, 2021 or 2022 data was not available, and 2020 data was not used because of the Covid-19 Pandemic. To get to a base year of 2025, which is considered a reasonable start time for construction, TEMPro growth factors, which have been adjusted in line with the National Traffic Model (NTM), have been applied to the observed traffic flows. This is an industry standard process adopted by the Department for Transport. The TEMPro software considers the future changes in traffic flows. Therefore, the traffic flows are robust. 4. As set out in the **6.3.14.2_B_ES Appendix 14.2 Construction Traffic Management Plan [EX3/6.3.14.2_B]** in Section 7, measure 'vii' Construction deliveries by HGV will be coordinated to arrive/depart between 09:30-16:30 to avoid the network peak hours of 08:00-09:00 and 17:00-18:00. Measure 'xi' is for a booking system. This will manage arrivals and departure times to avoid the peak hours. There may be instances when arrival/departure is unavoidable. This may be

LIR Ref.	Summary	Applicant's Response
		caused by supply chain issues or traffic delays elsewhere on the network. However, the aim, through the outline CTMP is to avoid peak hour arrivals and departures as much as possible. **5.** The identified accesses are required for the construction of the Scheme. The Cable Route Corridor will be approximately 21.3km in length and is directed across open countryside. It will require crossings of railways, watercourses, various utilities, Public Rights of Way (ProW) and roads. The identified accesses are required for the installation of cables across this distance, and the installation of equipment within the solar array sites. Where possible, internal access tracks will be constructed to connect different land parcels. Where this is not possible, access from the public highway is identified. For the most part, existing field accesses are utilised which will be formalised for the construction phase. As there are multiple accesses, access to the Scheme will be spread, reducing pressure on each individual road compared to a Scheme with a single access point, with corresponding reduction in impacts to receptors such as driver delay caused by congestion. **ES Chapter 14 Transport and Access [APP-049]** concludes that there are no significant effects in relation to Transport and Access as a result of the construction of the Scheme either individually or cumulatively. Within the shared grid connection corridor, the Cottam, West Burton, Gate Burton and Tillbridge projects have worked together to align access points where possible as detailed within **8.1.9_B Joint Report on Interrelationships between Nationally Significant Infrastructure Projects Revision B [REP2-010].** 6. Information on Abnormal Indivisible Load (AIL) movements is set out in Section 7 of the 6**.3.14.1 ES Appendix 14.1 Transport Assessment**

LIR Ref.	Summary	Applicant's Response
		[REP1-015] and Section 6 of the **6.3.14.2 B_ES Appendix 14.2 Construction Traffic Management Plan [EX3/6.3.14.2_B].** There will be a total of 7 AIL movements associated with the solar array element of the Scheme, and approximately 25 AIL movements per Cable Route Corridor access (see paragraphs 7.5 and 7.7 **of [REP1-015]).** Please refer to the Applicant's written response to WLDC-46 in WB8.1.17 Response to Written Representations at Deadline 1 Part 1. 7. Paragraph 14.9.7 of **6.2.14 ES Chapter 14 Transport and Access [APP-052]** states that the cumulative effects on the local highway network surrounding the Grid Connection Route will be low, as the cumulative Schemes will generally not use the same routes. The Grid Connection Route for the Scheme consists of two main parts: a shared grid connection corridor that will be used by multiple schemes located on the east of the River Trent to a point immediately to the west of the River Trent (accesses 110-112 as set out in Appendix C of the **6.3.14.2_B ES Appendix 14.2 Outline Construction Traffic Management Plan [EX3/6.3.14.2_B])** ; and the Grid Connection Route, used only by the Scheme, to connect to the National Grid at West Burton Power Station (forming the majority of the Scheme Grid Connection Route). The three other schemes that share the grid connection corridor (Cottam, Gate Burton and Tillbridge) all connect into the National Grid at the Cottam Power Station. Accordingly, there are no cumulative traffic impacts to the local highway network surrounding the Grid Connection Route as traffic associated with the grid connections for the cumulative schemes will be routed further south, towards Cottam Power Station. 8. Within the shared grid connection corridor, the Cottam, West Burton, Gate Burton and Tillbridge projects have worked together to reduce the environmental impacts of the grid connections. Details are

LIR Ref.	Summary	Applicant's Response
		provided within the Joint Report on Interrelationships between Nationally Significant Infrastructure Projects [REP2-010].A Joint Report on Interrelationships between National Significant Infrastructure Projects [REP2-010] has been prepared jointly by Applicants for the West Burton, Cottam, Gate Burton and Tillbridge Schemes. Paragraph 5.4.2 of the Joint Report on Interrelationships between National Significant Infrastructure Projects **[REP2-010]** states: "In the event the construction schedules are overlapping, a joint Construction Traffic Management Plan (Joint CTMP) would be produced that will set out construction traffic management and control measures relevant to those areas where vehicle routes overlap." Paragraph 5.4.4 of the same document states "A Joint CTMP could support implementation of shared mitigation measures such as joint traffic management, joint consultation with Lincolnshire County Council traffic officers, combined vehicle access and routeing plans, shared use of construction compounds, taking a holistic approach to construction traffic planning and management. In the meantime, the four developers are working closely together to identify further ways to collaborate and reduce impacts on communities and the environment". The West **Burton 6.3.14.2 B_ES Appendix 14.2 Construction Traffic Management Plan [EX3/6.3.14.2_B]** has been updated at Deadline 3 to include reference to the Joint Report on Interrelationships between National Significant Infrastructure Projects **[REP2-010]** and the Joint Construction Traffic Management Plan (new measure (xxv) in section 7). 9. The Applicant acknowledges this comment. The Appendix shows that the different schemes are adopting largely different construction vehicle routes. The cumulative impacts on roads that are used by

LIR Ref.	Summary	Applicant's Response
		both the Scheme and at least one other project have been assessed in section 10 of ES Appendix 14.1 Transport Assessment **[REP1-015],** finding no significant impacts.
WLDC 10.13 WLDC 10.23	WLDC identified no positive and negative impacts during construction.	The Applicant notes this point. Table 14.24 of **6.2.14 ES Chapter 14 Transport and Access [APP-052]** confirms there are no likely significant effects to transport receptors from the construction of the Scheme.
WLDC 10.14 to 10.22	WLDC has identified the following neutral impacts during construction: 1. Construction workers have been spread across the Sites on a proportional basis. 2. Construction vehicles will avoid travel during the network peak hours where possible. 3. Generally, accidents appear to be spread throughout the study area. Whilst the addition of any amount of traffic can increase a risk of accidents, it is considered that low level of construction traffic associated with the Scheme is unlikely to materially affect safety on the links in the study area, irrespective of percentage changes in traffic flows. Therefore, the effects on accidents and safety will be negligible. 4. On a day-to-day basis, the largest vehicle that will be used to deliver equipment to the Site will be a 16.5m	The Applicant notes all of these points. 1. The Applicant acknowledges that this comment is extracted from Paragraph 14.7.9 of **WB6.2.14 ES Chapter 14: Transport and Access [APP-052]**. 2. The Applicant acknowledges that this comment is extracted from Paragraph 14.7.6 of **WB6.2.14 ES Chapter 14: Transport and Access [APP-052]**. 3. The Applicant acknowledges that this comment is extracted from Paragraph 14.7.30 of **WB6.2.14 ES Chapter 14: Transport and Access [APP-052]**. 4. The Applicant acknowledges that this comment is extracted from Paragraph 14.7.4 of **WB6.2.14 ES Chapter 14: Transport and Access [APP-052]**. 5. The Applicant acknowledges that this comment is extracted from Paragraph 14.7.36 of **WB6.2.14 ES Chapter 14: Transport and Access [APP-052]**.

LIR Ref.	Summary	Applicant's Response
	articulated vehicle, although a significant proportion of movements will be by smaller vehicles. 5. The effects on severance of public rights of way will be negligible. 6. Whilst many of the rural links in the network have high percentage changes in traffic flows during the construction phase, they start from a low baseline. On the unclassified road (south of the A1500) to access West Burton 1, there is a 30% increase in traffic flows during the construction phase. However, 2025 baseline flows are 193 two-way movements per day. This will increase to 251 two-way movements. In this instance, whilst the percentage change in traffic flows is high there, will not be any significant driver delay associated with 251(502) two-way movements per day and effects are considered to be negligible and temporary. Effects regarding driver delay are anticipated to be minor and temporary for the Grid Connection Corridor. 7. Two public rights of way connect to the unclassified road to the south of the A1500, which provides the accesses to West Burton 1. In this location and for the Grid Connection Route, the effects on pedestrian delay are considered to be minor and temporary. In the rest of the study area, the effects are considered to be negligible and temporary.	6. The Applicant acknowledges that this comment is extracted from Paragraph 14.7.39 of **WB6.2.14 ES Chapter 14: Transport and Access [APP-052]**. 7. The Applicant acknowledges that this comment is extracted from Paragraph 14.7.43 of **WB6.2.14 ES Chapter 14: Transport and Access [APP-052]**. 8. The Applicant acknowledges that this comment is extracted from Paragraph 14.7.46 of **WB6.2.14 ES Chapter 14: Transport and Access [APP-052]**. 9. The Applicant acknowledges that this comment is extracted from Paragraph 14.7.47, Paragraph 14.7.48 and Paragraph 14.7.49 of **WB6.2.14 ES Chapter 14: Transport and Access [APP-052]**.

LIR Ref.	Summary	Applicant's Response
	8. Where the West Burton 1 access road connects to Public Rights of Way, and for the Grid Connection Corridor, the effects to pedestrian amenity are considered to be minor and temporary. Elsewhere in the study area, the effects are considered to be negligible and temporary. 9. All regulations for the movement of hazardous loads will be followed, and the appropriate documentation will be obtained. There will be some abnormal loads to transport the transformers for the 132kV and 400kV substations. These movements will be managed so that the potential effects are mitigated appropriately. Overall, it is considered that the likely effects of the construction traffic on hazardous loads will be negligible and temporary and therefore not significant.	
WLDC 10.25	*"During the operational phase, the residual effects on accidents and safety, severance, driver delay, pedestrian delay and amenity and hazardous loads will remain negligible. Therefore, there are not expected to be any significant residual effects in relation to Transport and Access as a result of the operation of the Scheme."*	The Applicant acknowledges that this comment is extracted from Paragraph 14.7.47, Paragraph 14.7.48 and Paragraph 14.8.3 of **WB6.2.14 ES Chapter 14: Transport and Access [APP-052]**.
WLDC 10.26	*"The Scheme is anticipated to have a design life of approximately 40 years. At the end of the Scheme's operational life it will be decommissioned. The number of vehicles associated with the decommissioning phase are not anticipated to exceed the number set out for the construction phase.*	The Applicant acknowledges that this comment is extracted from Paragraph 14.7.47, Paragraph 14.7.48 and Paragraph 14.8.4 of **WB6.2.14 ES Chapter 14: Transport and Access [APP-052]**.

LIR Ref.	Summary	Applicant's Response
	Therefore, there are not expected to be any significant residual effects in relation to Transport and Access as a result of the decommissioning of the Scheme."	
WLDC 10.27 to 10.29	WLDC make the following comments in relation to cumulative impacts: 1. *"Traffic flows associated with the cumulative schemes have the largest effect on Mill Lane and the A57. This is due to the introduction of two residential developments. As the number of traffic flows on these links associated with the construction phase of the Scheme are low, it is unlikely that the cumulative effects will be any different.* 2. *The cumulative effects on the local highway network surrounding the Grid Connection Route will also be low, as the cumulative Schemes will not use the same routes. It should be noted that sections of the Grid Connection Route for the Scheme will be shared with Gate Burton and Cottam Solar Project, although the residual effects will not change as a result of this.* 3. *There is an extant planning permission for Sturton le Steeple quarry, to be accessed via Access 101. The planning permission (ref 1/46/06/00014) restricts HGV movements to a maximum of 192 movements per day associated with the quarry (96 in and 96 out). The addition of eight arrivals and departures associated with cable route corridor, over a 90-day period, will not*	The Applicant notes all of these points. 1. The Applicant acknowledges that this comment is extracted from Paragraph 14.7.9 of **WB6.2.14 ES Chapter 14: Transport and Access [APP-052]**. 2. The Applicant acknowledges that this comment is extracted from Paragraph 14.7.6 of **WB6.2.14 ES Chapter 14: Transport and Access [APP-052]**. 3. The Applicant acknowledges that this comment is extracted from Paragraph 14.7.30 of **WB6.2.14 ES Chapter 14: Transport and Access [APP-052]**.

LIR Ref.	Summary	Applicant's Response
	result in a significant cumulative impact at this location."	
WLDC 10.30	*"Overall, the Scheme is not likely to result in any significant cumulative Transport and Access effects during the construction, operational or decommissioning phases."*	The Applicant notes this point.
NCC 8.2	*"The traffic associated with the provision of the grid connection would be unlikely to result in highway network capacity issues. However, there are roads on the grid connection construction routes within Nottinghamshire that are narrow with limited passing opportunities including North Street, Church Street (Sturton C of E Primary School), Low Holland Lane and Littleborough Road, Sturton le Steeple; Thornhill Lane and Northfield Road, North Leverton; Three Leys Lane and Fenton Lane, Fenton; Town Street, South Leverton; and Cottam Road, Broad Lane, and Headstead Bank, Cottam/Coates. Whilst these routes are very lightly trafficked, at least where they are beyond the conurbations, there will still be people who will have cause to use them and will require access."*	The Applicant notes this point. The Outline Construction Traffic Management Plan (CTMP) within **6.3.14.2_B ES Appendix 14.2 Outline Construction Traffic Management Plan [EX3/6.3.14.2_B],** and is secured by Requirement 15 in Schedule 2 to **3.1_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.2_C]**. The aim of the CTMP is to provide a framework for the management of construction vehicle movements to and from the Site, to ensure that the effect of the construction phase on the local highway network is minimised.
NCC 8.4	*"Whilst the outline CTMP scopes out how construction traffic will be managed, it does not address how conflict will be avoided with other traffic not associated with the proposed solar farm. That should be addressed including where powers are intended to be used in accordance with article 11 of the DCO (Temporary stopping up of streets and public rights of way) and what temporary alternative access arrangements are proposed."*	The interaction between traffic associated with the Scheme and other traffic is managed in two ways. The Outline Construction Traffic Management Plan (CTMP) within **6.3.14.2_B ES Appendix 14.2 Outline Construction Traffic Management Plan [EX3/6.3.14.2_B],** and is secured by Requirement 15 in Schedule 2 to **3.1_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.2_C]**. The aim of the CTMP is to provide a framework for the management of construction vehicle movements to and from the Site, to ensure that the effect of the construction phase on the local highway network is minimised. This framework focuses on managing the Scheme

LIR Ref.	Summary	Applicant's Response
		traffic to ensure, especially in narrow lanes close to accesses to the Scheme, that movements are safely managed so as to avoid delays to other road users. The use of the local highway network by other road users during construction of the Scheme will be managed through the powers contained within the draft DCO. Article 15 of **the draft Development Consent Order (Version C provided at Deadline 3) [EX3/3.1_C]** provides the Applicant with the power to implement traffic regulation measures to make temporary provision for the speed of traffic, restrictions on stopping, prescribed routes for traffic, and the suspension or amendment of existing Traffic Regulation Orders made under the Road Traffic Regulation Act 1984 (RTRA). These measures take effect as though they were Traffic Regulation Orders made under the RTRA. Paragraph (4) requires the Applicant to consult with the relevant chief of police and the traffic authority before implementing any traffic regulation measure, and paragraph (5) requires the Applicant to provide at least 4 weeks notice to the police and traffic authority, and place a newspaper notice of any traffic regulation measure at least 7 days in advance of it taking effect. The streets listed in Schedule 8 to the **draft Development Consent Order (Version C provided at Deadline 3) [EX3/3.1_C]** correspond with the streets listed in Schedule 4 (streets subject to street works) that may be subject to restrictions under article 11. Finally, in respect of maintaining access, article 11(2) requires reasonable access to be maintained to pedestrians going to or from premises abutting a street affected by the restriction (similar to the requirement found in section 3 of the RTRA).

LIR Ref.	Summary	Applicant's Response
		Taken together, the powers in the DCO and the measures in the CTMP will ensure, to the greatest extent practicable, that traffic on the road is managed so as to minimise impacts and ensure safety for all users.
NCC 8.5	*"The CTMP paragraph 7.2(xx) includes an intention to carry road condition surveys to identify and subsequently repair any damage attributable to construction activities at the Site. For the avoidance of doubt, that should include the cable route corridor."*	The Applicant notes this point. Measure 7.2(xx) confirms that the extent of the survey will be agreed with the local highway authority prior to commencement.
NCC 8.6	*"The article 14 of the draft DCO (Agreements with street authorities) allows for agreements to be entered into for the purposes of article 8 (street works) and article 10(1) (construction and maintenance of altered streets). That provision should be extended to include article 9 (Power to alter layout, etc., of streets) and article 13 (Access to works). The provisions in articles 8, 9, 10, and 11 should be subject to the street authority having first issued a licence or entered into an agreement in accordance with article 14. The street authority would wish to have the opportunity to approve the design and specification of any works within the streets listed in Schedule 4 to 8 and any other streets no matter how those works arise, the opportunity to inspect those works, and to recover associated costs."*	Please refer to question 1.5.14 in the **Applicant's Response to the First Written Questions [EX3/WB8.1.21]**. In respect of the submission that article 14 should be extended to cover articles 9 and 13, the Applicant confirms that this is not necessary as the works to which these articles relate already fall within the ambit of article 14. Article 9 provides the Applicant with the power to alter streets; this power is then used to carry out the works identified in article 10. The works, being contained in article 10, fall within the ambit of article 14. In respect of article 13, where accesses are located off the public highway, the relevant street is included within Schedule 5, being the streets subject to alteration of layout. This work is therefore included within the ambit of article 14 as it falls within article 10 of the DCO. The only exception is access AC06. This access is an existing agricultural field access and is required only during the operational phase. As such, no works are required to this access to make it suitable for the Scheme and no street works are to be carried out in this location.

LIR Ref.	Summary	Applicant's Response
NCC 8.7	*"The Highway Authority is satisfied that construction traffic and the need for highway works (including effects on public right of way) to facilitate the grid connection can be appropriately managed through the Construction Traffic Management Plan and provisions within the Development Consent Order."*	The Applicant notes this point.
LCC 8.6 LCC 8.7	LCC raise the following concerns: 1. *"The Highway Authority has concerns regarding the access route proposed for West Burton 1. This is proposed to use around 1.2km of the unclassified road south of the A1500 (Figure 6.1 of Transport Assessment(TA)). The number of daily vehicles using this, associated with the development, would be five HGVs and 23 Cars. This is in addition to the surveyed flows of around 200 existing daily vehicles on this route.* 2. *This road is a single track road around 3m in width, passing cars need to use the verge and for cars passing HGVs it is problematic. The road is also not straight with several sharp bends over this short length. Section 7 of the TA proposes this same route for abnormal loads, with vehicles of 100 tonnes and 36m in length using this route."*	The Applicant has responded to LCC on points LCC 8.6 to 8.10. Please refer to the Applicant's response to question 1.14.6 in the **Applicant's Response to the First Written Questions [EX3/WB8.1.21]**. It has been demonstrated that passing areas can be provided and that AIL vehicle can manoeuvre along the road. LCC has accepted this.
LCC 8.8	*"The TA suggest in Para 8.6 that temporary pass-by bays will be created on narrower sections of the highway and the DCO would allow powers to make adjustments in the highway verge."*	The provision of pass-by bays is secured by measure (iii) in paragraph 7.2 of **6.3.14.2_B ES Appendix 14.2 Outline Construction Traffic Management Plan [EX3/6.3.14.2_B]**.

LIR Ref.	Summary	Applicant's Response
LCC 8.9	*"It is recommended that for construction traffic, the applicant needs to identify where passing bays will be located on this route, there should be at least one bay on each straight section of the route, making around three bays over the 1.2km section. The proposed access points (Access 1 and 2) are to be at existing field accesses which are located on the bends. Layouts of the access junctions need preparing with swept paths for HGVs to show that two way movements can occur and the extent of the junction improvements necessary."*	Please refer to the Applicant's response to question 1.14.6 in the **Applicant's Response to the First Written Questions [EX3/WB8.1.21]**.
LCC 8.10	*"It is not considered that this highway is suitable for abnormal loads of 100 tonnes and 36m in length. The Wynn Report included in the Appendix to the TA shows the route in Appendix 1 and drawing number 22-1062.SPA04 shows road widening necessary on first bend - this involves land outside the highway boundary and the widening required on the next bend (about 450m to the west) has not been shown although the abnormal load would need to go further west to reach the first access into the site. There is no evidence provided that the road construction is capable of taking this abnormal load."*	Please refer to the Applicant's response to questions 1.14.6 and 1.14.7 in the **Applicant's Response to the First Written Questions [EX3/WB8.1.21**]. The Applicant has responded to LCC on this point and demonstrated that an AIL vehicle can manoeuvre along the road. LCC has accepted this.
LCC 8.11	*"There is also a need to ensure that the DCO provides a mechanism for the Highway Authority to review and provide the necessary specification for works in the Highway that would normally be captured via a Section 278 Agreement and the mechanism as how this will be achieved is still under discussion in the drafting of the DCO."*	Please refer to the Applicant's response to question 1.14.8 in the **Applicant's Response to the First Written Questions [EX3/WB8.1.21]**.

LIR Ref.	Summary	Applicant's Response
LCC 8.11	*"the Council concludes that traffic and transport impacts during the construction, operation, and decommissioning would be negative."*	The Applicant notes this point. Table 14.24 of **6.2.14 ES Chapter 14 Transport and Access [APP-052]** confirms there are no likely significant effects to transport receptors from the construction of the Scheme.
2.19 Waste		
WLDC 20.1	WLDC summarises the main points arising from the review of the Waste chapter of the Environmental Statement: 1. The Scheme will generate substantial quantities of both construction materials and wastewater. Employee activity will generate commercial, food and sewage waste. 2. WLDC notes concerns over the Scheme complying with Policy S10: Supporting a Circular Economy of the Central Lincolnshire Local Plan, due to the replacement and disposal of solar panels and other associated infrastructure that will be required during the Scheme's operation. 3. It is noted that there are inconsistencies between the methodologies used in the cumulative assessment of waste effects in the West Burton ES chapter and the Gate Burton ES chapter.	1. The Applicant has assessed the quantum of construction material waste likely to be generated in Table 20.5 of **WB6.2.20 ES Chapter 20 Waste [APP-058].** Wastewater from construction is predominantly limited to that used for welfare facilities, and will be removed by tanker to an approved wastewater and sewage treatment centre. As such, this would not give rise to significant environmental effects and is not considered further in the assessment. Employee activity will generate a minimal amount of commercial, food and sewage waste. Commercial and food waste will be managed by appropriate permitted waste carriers and taken to facilities in line with environmental permits and requirements. The Applicant has committed to a Construction Resource Management Plan, secured in **WB7.1_A Outline Construction Environmental Management Plan Revision A [REP1-034]** by way of Requirement 13 of Schedule 2 to **WB3.1_C Draft Development Consent Order Revision C [EN010133/EX3/WB3.1_C]**. 2. Waste impacts arising from the maintenance and replacement of broken or faulty equipment on the Scheme has been considered in Section 20.7 of **WB6.2.20 Environmental Statement - Chapter 20 Waste [APP-058]** and concludes that there is no greater than a slight

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		adverse effect (para. 20.7.19) on waste handling as a result of the Scheme. This is not considered to be significant in EIA terms. 3. The waste assessments reported in the Environmental Statements for West Burton and Gate Burton have been undertaken independently. Appendix E of the updated **WB8.1.9_B Joint Report on Interrelationships between Nationally Significant Infrastructure Projects [REP2-010]** summarises the respective findings.
WLDC 20.10 WLDC 20.11 WLDC 20.14 WLDC 20.15	WLDC has identified no positive and no neutral impacts during construction, operation, and decommissioning.	The Applicant notes this comment.
WLDC 20.12 to 20.13	WLDC has identified the following negative impacts during construction: 1. *"Construction activities associated with the Scheme are anticipated to result in waste generation, including construction materials and wastewater. Employee activity will generate commercial, food and sewage waste. The total estimated construction, demolition and excavation (CD&E) waste is 50,000 tonnes over the 24-month construction period (25,000 tonnes per annum) which is considered a minor magnitude increase (1.2%) for the Local Impact Area.*	The Applicant reiterates that these impacts from construction waste in Lincolnshire are not significant. The assessment of these effects is found in **WB6.2.20 ES Chapter 20 Waste [APP-058]** at the following paragraphs: 1. Paragraph 20.7.10; and 2. Paragraph 20.7.11.

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	2. *The consequent environmental effects from a temporary, medium term, minor magnitude uplift in CD&E waste are:* • *A neutral or slight adverse effect on recycling, reuse, and waste treatment handling (which is not considered significant in EIA terms).* • *A slight adverse effect on landfill waste handling (which is not considered significant in EIA terms)."*	
WLDC 20.16	WLDC has identified the following negative impacts during operation: *"It is anticipated that waste arising during operation will be minimal and will predominantly be related to the removal of expired or broken equipment that cannot be repaired, and packing material required for replacement material. Waste electrical or electronic equipment (WEEE) arising from the operation and maintenance of the Scheme is anticipated to be limited to worn or broken photovoltaic panels of a negligible quantity. The total estimated CD&E waste to be generated from the Scheme per annum during operation is 150 tonnes. Assuming that waste is handled proportionally between Lincolnshire and Nottinghamshire, this constitutes a negligible magnitude increase (0.007%) in CD&E waste handling. The resulting impacts are:*	The Applicant reiterates that these impacts from operational waste in Lincolnshire are not significant. The assessment of these effects is found in **WB6.2.20 ES Chapter 20 Waste [APP-058]** at paragraph 20.7.20.

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	• *A neutral effect on recycling, reuse, and waste treatment handling (which is not considered significant in EIA terms).* • *A neutral or slight adverse effect on landfill waste handling, as a result of its future very high sensitivity (which is not considered significant in EIA terms)."*	
WLDC 20.19 to 20.20	WLDC has identified the following negative impacts during decommissioning: 1. *"The Scheme is anticipated to generate substantive WEEE through decommissioning, including photovoltaic panels, batteries, and substation equipment, as well as other smaller quantities of WEEE from supporting electrical infrastructure. The total WEEE generated from the Scheme's decommissioning is 77,000-85,000 tonnes, of which 7,000-14,000 tonnes is considered to be hazardous (batteries). This, over a worst-case 12-month decommissioning phase, equivalent to a 6.4-12.8% rise in annual hazardous waste handling for the Local Impact Area.* 2. *As such, this is a medium-term temporary moderate to major magnitude impact, which is likely to have the following effects:* • *A slight or moderate adverse effect on recycling, reuse, and waste treatment handling (which is not considered significant in EIA terms).*	The Applicant reiterates that these impacts from decommissioning waste in Lincolnshire are not significant. The assessment of these effects is found in **WB6.2.20 ES Chapter 20 Waste [APP-058]** at paragraphs 20.7.34 to 20.7.36.

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	• *A slight adverse effect on landfill waste handling, as a result of its future very high sensitivity (which is not considered significant in EIA terms)."*	
WLDC 20.22	WLDC has identified no positive cumulative impacts.	The Applicant notes this comment.
WLDC 20.23 to 20.26	WLDC has identified the following cumulative neutral impacts: 1. *"The total estimated cumulative construction, demolition and excavation (CD&E) waste to be generated from the Scheme construction is 260,000 tonnes over the combined construction period from 2024-2028. The waste generated per annum (65,000 tonnes) equates to an uplift in CD&E waste of 3.1% from the combined estimated CD&E waste for Lincolnshire and Nottinghamshire (2024 base year). This is approximately 2.6 times greater than the individual impact of the West Burton Solar Project.* 2. *The total estimated CD&E waste to be generated from the Scheme per annum during operation is 654 tonnes. Per annum, this equates to an uplift in CD&E waste of 0.03% from the combined estimated CD&E 2024 baseline for Lincolnshire and Nottinghamshire.* 3. *Waste electrical or electronic equipment (WEEE) arising from the operation and maintenance of the cumulatively assessed projects is anticipated to be limited to worn or broken photovoltaic panels.*	The Applicant agrees with WLDC comments. The assessment of these effects is found in **WB6.2.20 ES Chapter 20 Waste [APP-058]** at paragraphs: 1. 20.10.9; 2. 20.10.12; 3. 20.10.13; 4. 20.10.17

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	4. *The cumulative total WEEE generated from the decommissioning of the cumulatively assessed projects is in the order of 260,000 tonnes, of which 19,500 tonnes is considered to be hazardous (batteries). This is likely to be spread over a number of years due to differing operational timescales associated with the cumulatively assessed projects. As such, it is not anticipated that the peak hazardous waste generation in any year during the cumulative decommissioning phase is anticipated to be substantively more than for the worst-case scenario for the Scheme in isolation. As such, the cumulative effect on hazardous waste handling in the Local Impact Area is not of any greater level of significance."*	
WLDC 20.27	WLDC has identified the following cumulative negative impacts: *"The total estimated CDE waste from the decommissioning of the cumulative projects is 260,000 tonnes. This is likely to be spread over a number of years due to differing operational timescales. For this cumulative assessment, peak waste streams are assumed to be similar to those during the cumulative construction phase, and as such the waste generated per annum (65,000 tonnes) equates to an uplift in CD&E waste of 3.1% from the combined estimated CD&E waste for Lincolnshire and Nottinghamshire (2024 base year). Assuming that waste is handled proportionally between Lincolnshire and Nottinghamshire, the cumulative impacts do not change the level of magnitude of the impacts, and thus do not change the*	The Applicant agrees with WLDC's comments. The assessment of these effects is found in **WB6.2.20 ES Chapter 20 Waste [APP-058]** at paragraphs 20.10.16. The Applicant reiterates that these cumulative impacts from decommissioning waste in Lincolnshire and Nottinghamshire are not significant, as assessed at paragraph 20.11.1 of Chapter 20 **[APP-058]**.

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	significance of the effects from the assessment of West Burton Solar Project in isolation. As such, a moderate or large adverse effect (which is significant in EIA terms) is identified on landfill waste handling in Nottinghamshire, due to the very high sensitivity of the receptor."	
LCC 11.13	*"it will be necessary for a requirement to be imposed on any DCO permitted that requires a waste management strategy to be submitted which demonstrates the expected quantity of solar infrastructure that will be discarded during the operational and decommissioning phases and the arrangements to be put in to ensure adequate facilities are available to sustainably dispose/recycle these items in the future."*	The Applicant does not anticipate that operational and maintenance waste streams arising from the need to replace broken solar panels, infrastructure or batteries will have any greater level of impact on waste handling than at either construction or decommissioning. As set out in paragraph 2.2.1, replacement of broken or faulty equipment is likely to be undertaken in an ad hoc manner, and suitable mitigation is secured in **WB7.14_B Outline Operational Environmental Management Plan Revision B [EN010132/EX3/WB7.14_B]** by way of Requirement 14 of Schedule 2 to **3.1_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C].**. **7.2 Outline Decommissioning Statement [APP-310]** sets out the principles of decommissioning and environmental considerations (see paragraphs 2.1.1 to 2.1.9) and provides a summary of potential mitigation and management measures during decommissioning in Table 3.1 of **[APP-310]**. It also sets out how roles, responsibilities and actions required in respect of implementation of the mitigation measures will be managed, along with principles for monitoring and reporting. By way of example and as contained within Table 3.1 of **[APP-310]**, provision is made that "*Infrastructure such as PV panels and battery storage units will be removed and recycled as far as practical and in accordance with legislation and guidance applicable at the time*". Further details will be provided in the final decommissioning plan submitted for approval prior to decommissioning. The commitment for the final decommissioning plan to be prepared and to be substantially in accordance

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		with the Outline Decommissioning Statement is secured by Requirement 21 of Schedule 2 to the **3.1_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C].** In response to this comment, the Applicant has also included the provision for a waste management strategy to be submitted as part of WB7.14_B Outline Operational Environmental Management Plan Revision B **[EN0101032/EX3/WB7.16_B]** and WB7.2_A Outline Decommissioning Statement Revision A **[EN010132/EX3/WB7.2_A]**.
LCC 11.13	*"The Council does however wish to draw the ExA attention to the point relating to not just the predicted decommissioning GHG emissions associated with the recycling or disposal of components and panels at specialist disposal facilities but also the need for replacement infrastructure during the lifetime of the development which is unrestricted and therefore could result in the infrastructure being replaced a number of times during the life time of the development. Therefore in this regard it is assessed as having a negative impact."*	The Applicant notes this comment. Waste impacts arising from the maintenance and replacement of broken or faulty equipment on the Scheme has been considered in Section 20.7 of **WB6.2.20 ES Chapter 20 Waste [APP 058]** and concludes that there is no greater than a slight adverse effect (see paragraph 20.7.19) on waste handling as a result of the Scheme. This is not considered to be significant. 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 **WB6.2.20 ES Chapter 20 Waste [APP-058]** which identifies an estimated volume of replacement PV modules of 130 tonnes per annum, the vast majority (approx. 95%) of which consists glass and metal frames, which are inert, and can easily be reused and recycled. However, it is considered likely that the majority of the solar panels used for the Scheme will be able to continue operating for longer than 40 years and therefore a 60 year time period has been proposed as the maximum time the Scheme can be in operation prior to being decommissioned, as is set out in Requirement 21 of

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		Schedule 2 to the **3.1_C Draft Development Consent Order Revision C [EN010132/EX3/WB3.1_C]**. The Applicant also confirms that the Environmental Statement has assessed the ad hoc maintenance of individual panels that might break or have a fault in them, but has not assessed the complete replacement of all of the panels over the lifetime of the Scheme. The Applicant therefore respectfully disagrees that the extent to which the panels can be replaced during the lifetime of the development is "unrestricted". The Scheme must be carried out in a way that does not give rise to any new or materially different significant environmental effects compared to those assessed in the Environmental Statement. As such, the Applicant is, in effect, restricted by what has been assessed in Chapter 20 of the ES **[APP-058]**, which is summarised above as being based on a worst case estimated failure rate of 0.4% per year.