

# West Burton Solar Project

## Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 4 and Responses to Action Points

Prepared by: Pinsent Masons LLP  
February 2024

PINS reference: EN010132

Document reference: EX4/WB8.1.28

The Infrastructure Planning (Examination Procedure) Rules 2010: 8(1)(c)



## **Issue Sheet**

**Report Prepared for: West Burton Solar Project Ltd.  
Examination Deadline 4**

**Issue Specific Hearing 4 on 8 February 2024**

**Cultural Heritage, Transport, Noise and Air Quality, Socio-Economic Health, and  
Cumulative Impacts**

**Prepared by:**

Pinsent Masons LLP

Agenda Item	Comments
<p><b>1. Welcome and Introductions</b></p>	<p>The ExA introduced the hearing and the following parties introduced themselves:</p> <ul style="list-style-type: none"> <li>• Claire Brodrick, Legal Director at Pinsent Masons LLP (solicitors for the Applicant)</li> <li>• Eve Browning, Senior Project Development Manager at Island Green Power</li> <li>• Alice James, Technical Director (Historic Environment) at Lanpro (EIA and planning consultants for the Applicant)</li> <li>• Emily Mercer, Director (Historic Environment) at Lanpro</li> <li>• Robert Roughan, Transport consultant at Transport Planning Associates, transport consultants for the Applicant (Mr Roughan introduced himself at agenda item 4A)</li> <li>• Neil Fletcher, Senior Environmental Consultant at Tetra Tech, noise consultants for the Applicant (Mr Fletcher introduced himself at agenda item 4B)</li> <li>• Stephen Flynn, Senior Planner at Lanpro (Mr Flynn introduced himself at agenda item 5A)</li> <li>• Tara Sethi, EIA Director at Lanpro</li> </ul> <p><u>Lincolnshire County Council</u></p> <ul style="list-style-type: none"> <li>• Neil McBride, Head of Planning</li> <li>• Stephanie Hall, Counsel, Kings Chambers</li> <li>• Martha Rees, Senior Solicitor</li> <li>• Jan Allen, Historic Environment Officer</li> </ul> <p><u>Nottinghamshire County Council</u></p> <ul style="list-style-type: none"> <li>• Stephen Pointer, Planning Policy Manager (attended virtually)</li> <li>• Ursilla Spence, County Archaeologist (attended virtually)</li> </ul> <p><u>West Lindsey District Council</u></p> <ul style="list-style-type: none"> <li>• Russell Clarkson, Development Manager</li> <li>• Alex Blake, Associate Director, Atkins</li> </ul> <p><u>7,000 Acres</u></p> <ul style="list-style-type: none"> <li>• Mark Prior</li> </ul> <p><u>Local residents</u></p> <ul style="list-style-type: none"> <li>• Simon Skelton</li> </ul>
<p><b>2. Purpose of the Issue Specific Hearing</b></p>	<p>The ExA explained the purpose of the hearing.</p>
<p><b>3. Cultural Heritage</b></p> <p>a) Study Area Selection</p> <p>b) Whether there has been a reasonable baseline assessment of the</p>	<p>The ExA confirmed that this agenda item was being postponed to either a later hearing or to be dealt with in written questions. Instead, an update on progress was provided. Ms Brodrick noted that a number of the issues relating to the Scheme also relate to the Cottam Solar Project, and that the Applicant therefore considered it would be helpful to provide the ExA with an update on actions that are taking place in relation to the Cottam Solar Project which have been requested by the Examining Authority for that Project.</p>

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<p>archaeological resource and the nature of development impacts upon it</p> <p>c) Approaches to mitigation and the management of identified non-designated archaeological remains</p> <p>d) The assessment of effects of the scheme on the Stow Park medieval bishops' palace and deer park, the identified harm and consideration of mitigation measures</p> <p>e) Cumulative impacts, on the wider landscape of heritage assets setting with specific reference to effects on Roman Villa at Scampton</p>	<p><b>Archaeology</b></p> <p>Ms James provided an update on archaeology.</p> <p>Ms James noted that the archaeological assessment has been undertaken in line with local and national guidance and has provided sufficient information to inform the DCO application and a robust mitigation strategy. She noted that details of the assessment works undertaken were provided in the Written Summary of the Applicant's Oral Submissions &amp; Responses at Issue Specification Hearing 1 and Responses to Action Points (ISH1) [REP1-052] and the Applicant's response to ExA First Written Questions [REP3-038].</p> <p>Ms James noted that the Applicant has requested feedback from both Lincolnshire and Nottinghamshire County Councils (LCC and NCC) with the aim of progressing Statements of Common Ground [REP1-061] and [REP1-068], and identifying areas where the parties are able to reach agreement, as well as defining those where there is currently disagreement.</p> <p>Ms James added that feedback has also been requested from LCC on the WSI [APP-122], with an aim identifying those elements of the document that the parties can agree. She noted that, for example, where a typical archaeological mitigation strategy has been proposed, the Applicant is hopeful that the parties will be able to agree the wording. She added that the Applicant was yet to receive feedback on these documents, but would very much welcome this being provided.</p> <p>Ms James noted that, based on discussions undertaken to date, the Local Impact Report [REP1A-002] and LCC's Responses to the Examiner's First Written Questions [REP3-042], the Applicant understands that there are two main areas of issue between the parties:</p> <ol style="list-style-type: none"> <li>1) The extent of evaluation trenching that has been undertaken within the Scheme's Order Limits. The Applicant understands that the Lincolnshire Historic Places Team (LHPT), who act as the archaeological advisors to both West Lindsey District Council in Lincolnshire and Bassetlaw District Council in Nottinghamshire, as well as LCC, consider a 2% sample (plus 2% contingency) should be undertaken pre-determination of the DCO application within all areas where there would be a potential for impact. She noted that she believed that the Senior Archaeological Practitioner for NCC believes a sample of 3 - 5% trenching should be undertaken.</li> <li>2) The use of concrete feet as a mitigation measure, due to concerns raised by LHPT that concrete feet may cause compaction and impact buried archaeological remains during the construction, operation and decommissioning phases of the Scheme.</li> </ol> <p>Ms James noted that for the Cottam Scheme, which has followed the same approach regarding archaeological evaluation as this Scheme, the Examining Authority asked the Applicant and LCC to discuss and prepare a without prejudice version of the WSI for that Scheme. She added that, for the Applicant, this meant preparing a version of the WSI that included a requirement to undertake further trial trench evaluation prior to the commencement of construction. Ms James noted that this version of the WSI has been produced and the Applicant is currently waiting for a response from LCC. She added that, similarly, LCC were asked to comment on the version of the WSI which has been submitted into the Cottam DCO Examination (without prejudice to their position on the extent of trial trenching - see [EN010133/REP4-025]). She confirmed that comments are also awaited from Lincolnshire County Council on that WSI.</p> <p>Ms James noted that, as the issues on the Cottam Solar Project are the same as for this Scheme, the Applicant's position is that it would assist the ExA and the Secretary of State for the same approach to be taken for the Scheme. The Applicant therefore proposes that a without prejudice version of the WSI be prepared and for LCC to provide comments on the current WSI on a without prejudice basis.</p> <p><b>Post hearing note: Please see the response to Action Point 3 in the table below.</b></p> <p><b>Heritage</b></p> <p>Ms Mercer provided an update on above ground heritage matters.</p> <p>Ms Mercer noted that the Statement of Common Ground with Historic England [REP1-063] details the comprehensive consultation that has and continues to be undertaken between the parties, as well as providing the positions of both the Applicant and Historic England on heritage matters.</p>

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	<p>Ms Mercer noted that the assessment of designated heritage assets within the Heritage Statement [APP-117 to APP-119], which was used to inform ES Chapter 13: Cultural Heritage [APP-051] is considered by Historic England to be proportionate.</p> <p>Ms Mercer noted that one issue remains under discussion with Historic England, and relates to the placement of panels within Medieval Bishop's Palace and Deer Park, Stow Park Scheduled Monument (NHLE 1019229). She added that, other than this, setting issues are considered appropriately mitigated, including any cumulative impacts, for example at Scampton Roman Villa Scheduled Monument.</p> <p>In response to submissions from Ms Allen on behalf of Lincolnshire County Council and Ms Spence on behalf of Nottinghamshire County Council, Ms Brodrick noted that given the purpose of this agenda item is to provide an update, the Applicant will not respond in detail to the submissions.</p> <p>Ms Brodrick explained that in the Cottam Examination, there was discussion about the potential for the Secretary of State to be minded to either agree with the Applicant's position on whether the trial trenching is sufficient, or they may be minded to agree with LCC and NCC's position or a middle ground, and therefore it was felt in order to make sure that there was sufficient information available for the Secretary of State, that comments on a without prejudice WSI containing a proposal for additional trial trenching would be helpful. She asked that it be made an action of this hearing that without prejudice comments are provided by LCC on the versions of the WSIs to be provided by the Applicant, so that discussions can be progressed, notwithstanding the in principle dispute about the extent of trial trenching. One version of the WSI will include no further trial trenching requirements, and another version of the WSI will be produced that does set out that trial trenching will be undertaken prior to the commencement of construction. The Applicant notes that Ms Allen and Ms Spence confirmed their agreement to progress discussions. Ms Brodrick confirmed that for Cottam, LCC has both versions of the WSI, and that the Applicant would undertake to send the without prejudice version of the WSI including pre-commencement trial trenching for this Scheme to LCC as soon as possible.</p> <p><b>Post hearing note: Please see the response to Action Point 3 in the table below.</b></p>
<p><b>4. Transport, Noise and Air Quality</b></p> <p>a) Consideration of alternative routes including any routes within other schemes, combined construction traffic management plan (CTMP), and parking standards for employment</p> <p>b) Noise and Air Quality survey methodological considerations.</p>	<p>A) <u>Consideration of alternative routes including any routes within other schemes, combined construction traffic management plan (CTMP), and parking standards for employment</u></p> <p>In response to the ExA introducing the agenda item and requesting an update on the potential for joint working between this Scheme and the other local NSIPs, Mr Roughan noted that he would refer to the 4 DCO schemes (these being this Scheme, the Cottam Solar Project, the Gate Burton Energy Park and the Tillbridge Solar Project). Mr Roughan noted there is not a large overlap with the construction routes for the main array sites of the 4 DCO schemes.</p> <p>Mr Roughan explained that, for West Burton, the main routes for Sites 1 and 3 are along the A1500 and for West Burton 2 the A57 and B1241. Mr Roughan explained that there is a slight overlap between the construction routes for the West Burton 1 and 3 Sites with Cottam, this being the southern section of the Cottam 1 site, where vehicles from both schemes will use the A1500. He added that the routes to the other parts of the Cottam scheme are on roads to the north of this Scheme and therefore there is no overlap. Mr Roughan further noted that the Gate Burton scheme will use accesses located on the A156 and Kexby Lane. West Burton does not propose to use either route and therefore there is no overlap, except for on the wider strategic road network of the A15 and the motorway network. He noted that the Tillbridge scheme is located to the north of the Scheme, with accesses predominantly on the A631, being to the north of the Scheme with no overlap for the solar array elements, apart from the A15 and the motorway network. For the Cable Route Corridor, Mr Roughan noted that it is forecast that each access will generate up to eight arrivals and eight departures per day for the delivery of material and equipment. Around half of these will be HGV trips and half LGV trips. He added that there will also be around 10 construction workers per access. Each access will only require deliveries for approximately 90 days. He concluded that cumulative effects will therefore not be significant.</p> <p>Mr Roughan acknowledged the additional provisions in the Outline Construction Traffic Management Plan (CTMP) [EX4/WB8.1.28] relating to the provision of a Joint CTMP between the DCO schemes. He referred to paragraphs 5.4.2 and 5.4.4 of the Joint Report on Interrelationships between National Significant Infrastructure Projects [EX4/WB8.1.9_C]. Paragraph 5.4.2 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."</p>

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	<p>Paragraph 5.4.4 of 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 routing 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".</p> <p>He further added that Measure 'xxv' of the CTMP [EX4/WB8.1.28] sets out more details on the Joint CTMP. This states:</p> <p><i>"In the event that the construction schedules associated with this Scheme and other schemes in the area overlap (being the Cottam Solar Project and the Gate Burton Solar Project), a joint Construction Traffic Management Plan (Joint CTMP) could be produced. This would set out construction traffic management and control measures relevant to those areas where the construction vehicle routes for the schemes would overlap, to reduce and manage any potential cumulative effects. This is particularly relevant to the Shared Cable Route Corridor with the Cottam and Gate Burton projects. The Joint CTMP would be agreed with the relevant authorities prior to commencement of construction".</i></p> <p>In response to submissions from Ms Warren, Mr Roughan referred to Access 101, close to West Burton Power Station, along the Cable Route Corridor. He noted that for each access, construction will take place for approximately 90 days, with eight vehicle movements per day and up to 10 workers per day. He noted the concerns raised by Ms Warren in relation to other schemes in the local area in respect of cumulative impacts, but that this is the anticipated impact from this Scheme.</p> <p>In response to the ExA's question relating to the Applicant's response to the Examining Authority's written questions and requests for information (ExQ1) First Written Question (FWQ) 1.1.9, [REP3-038] (which relates to new projects that have come into the public domain since the submission of the DCO application for the Scheme), Ms Brodrick responded that the further detail on the Stow Park solar project which is close to the West Burton 3 Site is being reviewed by the Applicant. She noted that project had submitted a scoping request to WLDC before Christmas 2023. Ms Brodrick noted that the Applicant is in the process of reviewing this, and the intention is to submit an addendum to the Environmental Statement covering any additional information obtained about that project which is relevant to the Scheme.</p> <p><b>Post hearing note: In relation to additional information about the Stow Park solar project, please see the response to Action Point 6.</b></p> <p>In response to submissions from NCC and Ms Warren relating to car parking around West Burton Power Station, Ms Brodrick said she had checked the CTMP [EX4/WB8.1.28] regarding the potential for construction workers who arrive early to park on local roads. She noted that the Applicant is not proposing to use the lane Ms Warren referred to, but acknowledges that it could potentially be used by contractors for parking. She noted that Point 7 in section 7 of the CTMP [EX4/WB8.1.28] includes a provision relating to parking and a reference to contractors and visitors only parking on site, meaning that the CTMP should address Ms Warren's concerns about parking on local roads. She added that the CTMP [EX4/WB8.1.28] also includes a complaints mechanism if that was not being complied with. She confirmed that the Applicant is therefore confident that there are suitable protections in the CTMP [EX4/WB8.1.28].</p> <p>In response to the ExA's question on Change 1 in the Change Application [AS-021 to AS-057], Mr Roughan noted LCC's concern about pass by bays on the A1500 and access points, and LCC's request for confirmation these bays could be provided. He added that the Applicant then provided this information including in relation to abnormal indivisible load (AIL) deliveries. He confirmed that in order to provide confidence this could be delivered, the Order Limits in this area have been extended.</p> <p>In response to the ExA's question relating to the Applicant's response to FWQ 1.14.3 [REP3-038] and AIL deliveries, and submissions from Ms Warren, Ms Roughan responded that there will be a limited number of cable route drums delivered to the Cable Route Corridor. He added that these are approximately 25-26m in length, so are technically defined as AILs but are on the smaller side. Mr Roughan noted that a specialist company called Wynns has been appointed to review the AILs, which is set out in in Appendix F of the Transport Assessment [EX4/WB6.3.14.1_C], and they are confident that there is sufficient width available for the movement of the cable route drums in this area.</p> <p><b><u>B) Noise and Air Quality survey methodological considerations.</u></b></p> <p><b><u>Noise</u></b></p> <p>In response to WLDC's submissions relating to clarifications on the approach taken on the noise assessment (set out in WLDC's response to the ExA's FWQ 1.10.2 [REP3-044]), Ms Brodrick responded that the queries recently raised in respect of the Cottam scheme are being considered. She added that responses have not been formally submitted into this examination yet, but assuming the responses are the same for West Burton, the Applicant will take the same approach across the two projects. She</p>

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	<p>requested details from WLDC of any additional wording they would like to be included in the management plans relating to noise issues. Mr Fletcher confirmed that the points raised by WLDC are being worked through, and a response will be provided in due course.</p> <p><b>Post hearing note: Please see the response to Action Point 1 in the table below.</b></p> <p>In response to submissions from Ms Warren relating to cumulative noise impacts of this Scheme and others near West Burton power station, Mr Fletcher responded that, similarly to the transport assessment just described, cumulative assessments have been undertaken of nearby applications which have either been consented, exist or are coming forward. In terms of the cable route, a worst case noise assessment has been undertaken whereby it is assumed that noise intensive activities, excavation, for example, may be taking place as close as possible within the Order Limit to the nearest sensitive receptors. He added that should more than one cable route be constructed at the same time, the noise impact on the nearest sensitive receptor would not increase. It would be as low as what was assessed in the Scheme's noise assessment (see Environmental Statement Chapter 15: Noise and Vibration [APP-053]). Mr Fletcher added that if the cable routes for the different projects were to be consecutively constructed, there is scope for a lengthened construction noise period.</p> <p>In response to further submissions from Ms Warren, Ms Brodrick re-iterated that the Applicant would be providing an addendum to the Environmental Statement to consider any cumulative effects from projects that have come forward since the DCO application was submitted, including whether this results in the need for any additional mitigation. She added that, at the moment, the assessment concludes that the cumulative noise effects are within acceptable levels, and that therefore there would not need to be any staggering of works to mitigate noise impacts. She added that there are various measures that are set out in the Outline Construction Environmental Management Plan [REP3-018] to try and reduce noise as much as practicable. She added that the Applicant does not consider there is a need for any additional mitigation, but this will be confirmed in the addendum itself.</p> <p><b>Post hearing note: Please see the response to Action Point 6.</b></p> <p>In response to the ExA's question relating to the Applicant's response to FWQ 1.10.10 [REP3-038], which relates to the expected level of noise from panels, any hum and any associated equipment, Mr Fletcher noted that the electrical equipment on the sites will include motors operating the tracking panels which create a low level of noise emission. He added that there would be inverters serving the solar panels which are the most noise intensive equipment that will be installed. He confirmed that transformers can emit some low level frequencies and that, in terms of the assessment, no impulsive noise or any on/off switching noise is anticipated. He confirmed that tonal characteristics are accounted for by including a tonal characteristics penalty into the assessment. In response to a further comment from Ms Warren, Mr Fletcher described how the noise modelling was undertaken, assessing impacts against relevant BSI technical standards. He noted the model used incorporates every piece of noise creating equipment proposed to be installed on the sites. In response to further comments from Ms Warren, he confirmed the modelling is completed on computers, rather than outside (although the baseline is established from on site surveys).</p>
<p><b>5. Socio-Economic and Health</b></p> <ul style="list-style-type: none"> <li>a) Consideration of the health impacts of the proposal, including the interrelationship with other projects, and how these have been assessed</li> <li>b) Health equality and variable impact on different communities</li> <li>c) The impact of the proposal on the Local Industrial Strategy and Other Economic Objectives</li> </ul>	<p><b><u>A. Consideration of the health impacts of the proposal, including the interrelationship with other projects, and how these have been assessed</u></b></p> <p>In response to the ExA asking how the health impact assessment in the Environmental Statement (ES) could be made more readily understood, Ms Brodrick noted that approach has been for this to be undertaken across the different ES topic areas, as agreed in the Scoping Opinion [APP-068].</p> <p>Mr Flynn provided a summary of the health impact assessment undertaken. He noted that where significant residual effects are anticipated as a result of the Scheme, these have been summarised and presented at Section 21.5 Human Health in ES Chapter 21: Other Environmental Matters [APP-059]. He confirmed that this approach to presenting the human health and wellbeing effects from the Scheme (namely, integration within ES topics with a separate summary chapter for significant effects) is consistent with Institute of Environmental Management and Assessment (IEMA) Guidance. He reiterated that this approach was agreed by PINS in their Scoping Opinion of March 2022 [APP-068]. Mr Flynn explained that the assessment of human health impacts looks at the effects identified throughout the ES technical topics to identify where those effects have a pathway to impacting on the human health and wellbeing of the general population in the impacted area and certain population groups. In accordance with the IEMA guidance, on assessing human health in EIA, only where the pathway is identifiable have the human health effects been considered. He added that, to determine the significance of the effects, human health and wellbeing has predominantly been based on the effects as reported in the ES technical topics, however a level of professional judgement has been applied, particularly where there is a subjective element to the assessment.</p>

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	<p>Mr Flynn further explained that as part of the assessment, the Applicant has been aware of the wider factors of health, including mental health and wellbeing. He provided the examples such as glint and glare having an effect on residential amenity and the associated wellbeing impacts. He added that, similarly, residential amenity impacts of construction and operational noise have been considered as health impacts. Likewise, the desirability and use of recreational facilities in the area around the scheme including, formal and informal facilities such as sports facilities, playgrounds, public rights of way, recreational routes and navigable waterways has been considered. He confirmed that all of these examples have been assessed as human health and wellbeing considerations due to the pathway between the original impacts such as noise impacts, clinical impacts and tourism and recreation impacts. Mr Flynn confirmed that, in accordance with the guidance, the impacts have been applied to the population of the whole area covered by the Scheme, rather than individuals who might be particularly sensitive to change. Mr Flynn explained that the cumulative health impacts have been assessed using the same methodology in terms of using the cumulative assessment in each of the technical topics, then applying a health and wellbeing approach to determine the significant effect to the population's health and wellbeing.</p> <p>In response to submissions from Mr Prior and Ms Warren and questions from the ExA relating to a reference document for the health assessment, Ms Brodrick responded that a summary document was requested for the Cottam scheme and submitted at the last deadline. She confirmed that an equivalent document for this Scheme can be provided for Deadline 4. She added that this will also summarise the concerns raised by Interested Parties relating to the presentation of health effects, and will explain why the assessment undertaken by the Applicant is adequate to address these concerns. Ms Brodrick noted that the health assessment has been carried out in accordance with IEMA guidance, confirming that there is no requirement for this to be undertaken by a medical professional, as was suggested by Mr Prior.</p> <p>Ms Brodrick stated she considered there to be a misunderstanding by 7,000 Acres of what the health assessment is and the need for there to be a pathway between the impacts of the Scheme (as mentioned by Mr Flynn) and health and wellbeing of local residents. She noted that a number of Interested Parties do not agree with the conclusions reached in the assessment of these topics, for example, the impacts on residential amenity or visual receptors, so naturally it will mean they do not agree with the conclusions in terms of impacts on health. She noted the need to recognise the actual substance of the concerns being raised: whilst it is being presented as the Applicant not having undertaken sufficient assessment, it is the Applicant's position that the Interested Parties instead do not agree with the conclusion of the assessment undertaken.</p> <p><b>Post hearing note: Please see the response to Action Point 4 in the table below.</b></p> <p>In response to submissions made by WLDC relating to a 500m buffer used for the health assessment, and submissions from Ms Warren relating to the assessment across county boundaries, Mr Flynn responded that as a result of the health assessment being based on a number of ES topic chapters, the study area for each topic is individually derived. He added that the 500m buffer relates to the noise and air quality assessment, but for other topics it is different. For example, socio-economic effects such as deprivation have been assessed at the Local Impact Area level (the combined area of WLDC and Bassetlaw district), as set out in Chapter 18: Socio Economics, Tourism and Recreation [APP-056]. Mr Flynn added that, rather than a set defined area, the study area for the assessment depends on the type of effect. He noted that at Deadline 4 the written representations submitted by WLDC would be responded to. He confirmed that socioeconomic data sources from Bassetlaw and West Lindsey districts were used in the assessment, where it was necessary to cover those areas. He noted this includes data sourced from the Office for Health Improvement and Disparities, which is also used to produce the county-level Joint Strategic Needs Assessments.</p> <p><b>Post hearing note: For the Applicant's responses to the submissions raised by WLDC at Deadline 2 and 3, please refer to the Applicant's Response to Deadline 2 and 3 Submissions [EX4/WB8.1.23].</b></p> <p>In response to a further comment from WLDC relating to non-compliance with policies in the Central Lincolnshire Local Plan 2023 raised in WLDC's response to the ExA's FWQ 1.6.2 [REP3-044], Mr Flynn responded that Policy S54 (which sets out the need for a health impact assessment to be undertaken for certain types of development) covers the same scope as what is presented in the Environmental Statement. He added that, furthermore, the scoping process for a health impact assessment would be expected to be done at the same time as EIA scoping, to make sure they were conjoined. He added that it was the Applicant's understanding that the scope for the health assessment was agreed by PINS and the local authorities in the Scoping Opinion [APP-068]. Mr Flynn added that pre-application for the Scheme, no request was made for a specific health impact assessment. He added that whilst the Applicant understands that it may be slightly at odds with the specific wording of policy S54, the Applicant does not consider that the Scheme is in disagreement with the policy's aims. He added that the Applicant considers the Scheme will be beneficial on some</p>



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	<p>aspects, such as access to employment. Mr Flynn confirmed the following sources were used for the baseline for the health assessment in Chapter 18: Socio Economics, Tourism and Recreation <b>[APP-056]</b>:</p> <ul style="list-style-type: none"> <li>• March 2021 census data for self assessed health and physical health attributes;</li> <li>• Indices of Multiple Deprivation (2019) to understand deprivation in the area;</li> <li>• Office of Health Improvement and Disparities data (collected between 2020 and 2022) to ensure most up to date information on prevalence of physical and health disabilities within the study area;</li> <li>• Open source data from the NHS (December 2022) to determine the level of access to primary health care within the study area; and</li> <li>• Department of Work and Pensions records (from August 2022) for recipients of disability allowance. <i>[Post hearing note: The date of the data has been confirmed post-hearing].</i></li> </ul> <p>Mr Flynn confirmed this data was collected through 2022 ahead of PEIR and Section 42 statutory consultation and revised thereafter up to February 2023 leading up to the DCO application being made in March 2023.</p> <p><b><u>B. Health equality and variable impact on different communities</u></b></p> <p>In response to the ExA's asking if steps should have been taken to specifically address impacts on deprived communities, Mr Flynn stated that baseline data used has identified where geographically, and in which demographics, health inequalities exist in the population of the Local Impact Area. Given that much of this crosses over with socioeconomics, this is the area that has been assessed for matters like deprivation. He confirmed that this has been used to identify vulnerable groups and determine the sensitivity of these groups to changes in their environment as a result of the Scheme, and that therefore contributes to determination of the sensitivity of the population as a whole to changes.</p> <p>Mr Flynn added that, with regard to deprivation specifically, whilst the Applicant has given a single level of sensitivity for deprivation across the Local Impact Area, that is fully cognisant of areas of specific deprivation such as Gainsborough, hence why these have been taken forward as the most sensitive parts of the assessment. He confirmed that the reason for bringing this together and determining the sensitivity of the population of the whole is to make the assessment proportionate to the impacts of the Scheme, and this has been done in accordance with IEMA Guidance.</p> <p>In response to a comment from the ExA regarding a traveller site at Odder, Mr Flynn confirmed that the primary concern relates to flooding. He added that, given the residual effects on flooding (set out in ES Chapter 10: Hydrology <b>[REP1-073]</b>) are not assessed to be significant, it was not taken forward as a point of note for the health assessment, as it was not deemed to cause any disproportionate effect on any vulnerable group.</p> <p>In response to the ExA requesting further information about the differential impacts between rural and urban communities, Mr Flynn confirmed this had been taken into consideration. He noted that the level of sensitivity to access to primary healthcare is an important difference between these settings and that the importance of recreational facilities in the countryside is acknowledged to play a greater role in respect of physical and mental wellbeing. He noted the same is true as to why recreational facilities in small villages for sports and youth groups are particularly considered. He confirmed that this feeds into the assessment of the sensitivity of different areas to the impacts of the Scheme.</p> <p>In response to a further comment from Mr Prior's, Ms Brodrick noted she considers there is a misunderstanding of the role of an EIA which includes a combination of different techniques including reviewing material that is publicly available from a variety of data sources and obtaining information from carrying out specific site surveys on the ground. She added that all the information is collated, the EIA assessment is carried out, and an Environmental Statement is produced. She noted it is completely incorrect to say that desk-based assessments are not adequate for the production of an EIA.</p> <p><b><u>C. The impact of the proposal on the Local Industrial Strategy and Other Economic Objectives</u></b></p> <p>In response to the ExA introducing the agenda item and asking what confidence the local community can have that employment benefits will be felt locally, Mr Flynn noted that the Applicant has prepared the Outline Skills, Supply Chain and Employment Plan (OSSCEP) <b>[EX4/WB7.10_A]</b> which sets out how the benefits of the Scheme</p>

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	<p>can be directed to the local area, including measures to be included for those who have greater difficulties in accessing employment. He added that the same is true for education, skills and attainment, noting the measures set out in the OSSCEP [EX4/WB7.10_A] to address this at the Local Impact Area level. Ms Brodrick added that the OSSCEP [EX4/WB7.10_A] was updated at the last deadline of the Cottam Examination to make the commitments more certain, whilst also retaining flexibility to accommodate different proposals that may be available at the time of construction. She confirmed that the same updates are proposed to be made to the OSSCEP for this Scheme for Deadline 4. She added that if WLDC would like to see particular additions that are distinct to this Scheme as compared to the Cottam project, the Applicant would be happy to consider them.</p> <p><b>Post hearing note: The Outline Skills, Supply Chain and Employment Plan has been updated – please see the response to Action Point 5 below.</b></p> <p>In response to further questions from the ExA, Mr Flynn noted that even though ES Chapter 18: Socio-Economics, Tourism and Recreation [APP-056] does not expressly reference it, the Greater Lincolnshire Local Enterprise Partnership's Local Industrial Strategy (January 2021) and Greater Lincolnshire Local Enterprise Partnership's Economic Plan for Growth (2021) have been considered as part of the assessment. He noted that as these were used to inform the Central Lincolnshire Local Plan 2023, this document is referred to in Chapter 18 [APP-056], rather than these underlying documents. He noted OSSCEP [EX4/WB7.10_A] does refer to these documents, and also considered the economic strategy documents produced by the Derby, Derbyshire, Nottingham, and Nottinghamshire Local Enterprise Partnership (D2N2). He concluded that the Applicant is confident that none of the strategies in the Local Industrial Strategy are impacted adversely by the Scheme.</p>
<p><b>6. Cumulative Impacts</b></p> <p>a) Overview of the approach to the consideration of cumulative effects:</p> <ul style="list-style-type: none"> <li>(i) Applicant to provide an overview including methodology, the likely significant effects identified, any updates and the approach to ongoing collaboration</li> <li>(ii) Consideration of whether other plans or projects need to be included in the cumulative assessment</li> <li>(iii) Consideration of whether an appropriate level of detail has been considered at construction, operational and decommissioning stages, particularly in terms of how construction activity and mitigation measure would be coordinated</li> </ul> <p>b) Topic based discussion (if not already covered earlier in ISH3 and ISH4 discussions):</p>	<p>The ExA confirmed at the beginning of the hearing that this matter is to be postponed for further consideration at a later date.</p>

Agenda Item	Comments
<ul style="list-style-type: none"> <li>(i) Climate Change</li> <li>(ii) Construction traffic management</li> <li>(iii) Cultural Heritage</li> <li>(iv) Landscape</li> <li>(v) Biodiversity and Ecology</li> <li>(vi) Soils and Agriculture</li> <li>(vii) Socio-economic</li> <li>(viii) Waste</li> <li>c) Any other points not already covered on cumulative assessment and impacts</li> </ul>	
<p><b>7. Other Matters</b></p>	<p>No other matters were raised by the Applicant.</p>
<p><b>8. Review of Actions</b></p>	<p>Please see the 'List of actions for the Applicant and other parties following the Issue Specific Hearing 4' below.</p>
<p><b>9. Close</b></p>	<p>The ExA closed the hearing.</p>

**List of actions for the Applicant and other parties following the Issue Specific Hearing 4 (8 February 2024)**

No	Party	Action	Deadline	Applicant's response
1	West Lindsey District Council (WLDC) & Applicant	To work through WLDC concerns regarding Noise Survey methodology (approx. 12 concerns set out in WLDC Local Impact Report and elsewhere).	4	The Applicant has had discussions with WLDC and has submitted updates to Table 3.6 in Outline Construction Environmental Management Plan Revision C <b>[EX4/WB7.1_C]</b> to address night time construction noise.
2	WLDC/ Other Interested Parties	To provide wording for consideration by the Applicant within various Management Plans.	4 / Ongoing	N/A
3	Applicant/Lincolnshire County Council (LCC) and Nottinghamshire County Council (NCC)	Applicant to provide an alternative without prejudice version of the Written Scheme of Investigation (WSI), which would require further trial trenching prior to construction, to LCC and NCC for comment during w/c 12 February 2024. LCC and NCC to provide comments on both the versions of the WSI	4	The Applicant has provided the without prejudice version of the WSI to LCC and NCC for their comments. Comments on the without prejudice version of the WSI for the Cottam Solar Project have been received and are being reviewed. Additionally, an updated version of the WSI has been submitted into the Examination <b>[EX4/WB8.2.9]</b> .
4	The Applicant	To provide a co-ordinated Health Impact document.	4	Please refer to the ES Addendum 21.1: Human Health and Wellbeing Effects <b>[EX4/WB8.4.21.1]</b> .
5	The Applicant	To provide an updated Outline Skills Plan.	4	Please refer to the Outline Skills Supply Chain and Employment Plan <b>[EX4/WB7.10_A]</b> .
6	The Applicant	To provide Addendum to the Joint Report on Interrelationships based 4 on recent information about other solar projects which is now in the public domain.	4	Please refer to the Technical Note on Cumulative Effects of Additional Schemes <b>[EX4/WB8.2.5]</b> , which covers the Stow Park, One Earth, Great North Road solar projects.
7	All	Written summaries of oral submissions.	4	This document is the Applicant's written summary of its oral submissions at ISH4.