

# West Burton Solar Project

## The Applicant's Response to Deadline 4 and Deadline 4A Submissions

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## Contents

<b><u>1</u></b>	<b><u>INTRODUCTION</u></b>	<b><u>3</u></b>
<b><u>2</u></b>	<b><u>APPLICANT'S RESPONSES TO DEADLINE 4 SUBMISSIONS</u></b>	<b><u>4</u></b>
2.1	SUBMISSIONS BY HOST PLANNING AUTHORITIES	4
2.2	SUBMISSIONS BY 7000 ACRES	64
2.3	SUBMISSIONS BY PARISH COUNCILS AND STATUTORY BODIES	126
2.4	SUBMISSIONS BY AFFECTED PERSONS, INTERESTED PARTIES AND OTHER MEMBERS OF THE PUBLIC	142
<b><u>3</u></b>	<b><u>APPLICANT'S RESPONSES TO DEADLINE 4A SUBMISSIONS</u></b>	<b><u>220</u></b>
3.1	SUBMISSIONS BY HOST PLANNING AUTHORITIES	220
3.2	SUBMISSIONS BY 7000 ACRES	221
3.3	SUBMISSIONS BY PARISH COUNCILS AND STATUTORY BODIES	222
3.4	SUBMISSIONS BY AFFECTED PERSONS, INTERESTED PARTIES AND OTHER MEMBERS OF THE PUBLIC	232

## Issue Sheet

Report Prepared for: West Burton Solar Project Ltd.  
Examination Deadline 5

### Applicant's Response to Deadline 4 and Deadline 4A Submissions

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## **1 Introduction**

1.1.1 This report provides the Applicant's responses to matters raised in submissions made at Deadline 4 on 28th February 2024 and at Deadline 4A on 14th March 2024.

## 2 Applicant's Responses to Deadline 4 Submissions

### 2.1 Submissions by Host Planning Authorities

Lincolnshire County Council [REP4-078] and Lincolnshire County Council and Nottinghamshire County Council [REP4-080]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
LCC-01	Cultural Heritage	Written Scheme of Investigation	As it currently stands we cannot agree these WSIs. Our position remains that the site has not been adequately evaluated in line with professional guidance and standard archaeological practice and as such we cannot recommend either of the proposed post consent strategies.	<p>The Applicant considers the archaeological evaluation is sufficient to support the DCO application for the Scheme, and a robust mitigation strategy (Written Scheme of Investigation (WSI) provided in <b>ES Chapter Appendix 13.7 [EN010132/EX5/WB6.3.13.7_B]</b>), which is secured by Requirement 12 of Schedule 2 of the Development Consent Order <b>[EN010132/EX5/WB3.1_F]</b></p> <p>If Secretary of State considers that there is a need for further trenching to inform the extent and nature of any mitigation measures or the detailed design, the Applicant considers that this can be undertaken post-determination of the DCO application, and in advance of the construction of the Scheme.</p> <p>A 'without prejudice' archaeological WSI <b>[EN010132/EX5/WB8.2.9_A]</b> has been prepared and submitted into the Examination that includes a programme for further</p>

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				<p>archaeological trenching post-determination of the DCO application, matching the percentage area sample of trenching undertaken for the nearby Gate Burton Scheme, which was considered by LCC to be sufficient to inform the Gate Burton DCO application and mitigation strategy.</p> <p>Please refer to the <b>Comparison of Archaeological Evaluation Investigations on Solar Schemes' report [REP4-001]</b>, agenda item 3 of Issue Specific Hearing 5, for further detail on the Applicant's position. Furthermore, a Cultural Heritage Position Statement appended to the Draft Statement of Common Ground with Lincolnshire County Council (LCC) will be submitted to the examination at the next suitable opportunity.</p>
LCC-02	Cultural Heritage	Written Scheme of Investigation	As we have consistently stated throughout the NSIP process, adequate trial trenching is required to inform an appropriate and fit for purpose mitigation strategy to adequately deal with the developmental impacts. This trenching should cover the full impact zone including the redline boundary and cable routes and be undertaken pre-consent to be in accordance with NPPF paragraphs 200 and 201 and the EIA Regulation 5 (2d)).	<p>The Applicant is not aware of any published local or national guidance that states the necessity of, or the percentage sample required for, evaluation trial trenching, which is required to support a proposed development that has a low impact to buried archaeological remains, such as a solar-based development.</p> <p>As stated in paragraph 1.1.8 of the <b>Comparison of Archaeological Evaluation Investigations on Solar Schemes [REP4-001]</b> a flexible approach to evaluation trenching should be undertaken "with</p>

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				<p><i>consideration to baseline information and, where available, the results of non-intrusive evaluation”.</i></p> <p>The Applicant considers that the sample of evaluation trenching should be justified based on the archaeological evidence, and that a high sample of evaluation trenching for solar schemes, especially in blank areas, is only warranted when baseline information and the results of non-intrusive evaluation (i.e. geophysical survey, LiDAR, aerial photographic analysis) is not sufficient in fulfilling the Standard for Archaeological Field Evaluation as defined by the Chartered Institute for Archaeologists (CifA):</p> <p><i>“An archaeological field evaluation will seek to determine, record and report on the nature, extent, preservation and significance of archaeological remains within a defined area”<sup>1</sup></i> (See Appendix A).</p> <p>Baseline information for the Scheme, including the results of non-intrusive evaluation, has been proven to be reliable in identifying concentrations of archaeological sites. The Applicant considered the approach recommended by the archaeological</p>

<sup>1</sup> CifA 2023, Standard for Archaeological Field Evaluation, Online (last accessed 26.03.2024)  
<https://www.archaeologists.net/sites/default/files/Standard%20for%20archaeological%20field%20evaluation.pdf>

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				<p>advisors for West Lindsey in Lincolnshire and Bassetlaw in Nottinghamshire of uninformed trenches across all areas within the Order Limits to does not take into account baseline information and is not therefore consistent with the guidance provided by ClfA. It is also considered to be unreasonable and disproportionate to the impact caused by the nature of the Scheme, which are key principles of NPS EN1 (November 2023 - paragraph 5.9.10) and NPPF (paragraph 200) as well as Policy S57 of the Central Lincolnshire Local Plan.</p> <p>The Applicant considers the nature of archaeology and the results acquired by the evaluation techniques used to identify concentrations of archaeological remains within the Scheme are paralleled elsewhere in the East of England, and that there is no justification for an alternative approach to that which has been proven successful in assessing the archaeological potential of sites.</p>
LCC-03	Cultural Heritage	Written Scheme of Investigation	Trenching results are essential not only to inform mitigation but to ensure effective risk management and allows the developer to present a programme that is deliverable. As we are now in the post submission stage we would do our best to facilitate completion of an appropriate scheme of trenching evaluation before the	The Applicant considers the archaeological evaluation is sufficient to support the DCO application for the Scheme, and a robust mitigation strategy (Written Scheme of Investigation (WSI) provided in ES Chapter Appendix 13.7 [EN010132/EX5/WB6.3.13.7_B]), which is secured by Requirement 12 of Schedule 2 of the



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			determination, to allow the results to inform a reasonable and robust site specific mitigation strategy.	<p>Development Consent Order [EN010132/EX5/WB3.1_F].</p> <p>As such the Applicant believes the application contains adequate mechanism to effectively manage any archaeological 'risk' and that the programme of post-determination archaeological works is deliverable.</p> <p>The Applicant considers that the archaeological mitigation strategy set out in the WSI [EN010132/EX5/WB6.3.13.7_B] contains sufficient flexibility to enable appropriate mitigation of buried archaeological remains. The Applicant does not consider that a programme of evaluation trenching prior to determination of the DCO Application would result in a significant change to the mitigation strategy proposed that would materially influence the determination of the DCO Application (i.e. it is not anticipated that exceptional archaeological remains of a high importance would be identified that could not be mitigated and so would prevent the Scheme being deliverable).</p>
LCC-04	Cultural Heritage	Written Scheme of Investigation	We offer our specific comments on the WSIs below to give examples of the level and extent of issues we cannot agree. Section 1.1.5 states that <i>'This WSI also takes into account the results of consultation and engagement undertaken with the Lincolnshire County</i>	A Cultural Heritage Position Statement appended to the Draft Statement of Common Ground with Lincolnshire County Council (LCC) will be submitted to the examination at the next suitable opportunity. This will contain details of the

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			<p><i>Council Historic Environment Team (who also provide archaeological planning advice to Bassetlaw District Council, Nottinghamshire) and Historic England, throughout these stages of work, including regular meetings undertaken to monitor the progress of the evaluation trenching.</i> It does not. We have consistently stated throughout the engagement process that adequate trenching across the redline boundary is essential for providing sufficient baseline evidence to inform fit for purpose mitigation of the developmental impact across this scheme. Adequate trenching has only taken place across 21% of the scheme and therefore currently only 21% of the site can be effectively mitigated.</p>	<p>extensive consultation and engagement which has been undertaken with the Lincolnshire County Council Historic Environment Team.</p> <p>The main area of disagreement between LCC and the Applicant relates to the extent of trenching undertaken pre-determination of the DCO application for the Scheme. Therefore, while the Applicant notes that the extent of trenching was not agreed with LCC, the Applicant considers that the extent of trenching requested by LCC is contrary to national and local guidance and policy (See paragraph 5.9.10 NPS EN1 (November 2023), 3.10.105 of NPS EN3 (November 2023), 200 of NPPF (December 2023), Policy S57 of the Central Lincolnshire Local Plan, The Chartered Institute for Archaeologists Standard and Universal Guidance for Archaeological Field Evaluation, and the Lincolnshire County Council Archaeology Handbook) and not in line with the scope of works required for other solar-based DCO applications or solar schemes in Nottinghamshire or Lincolnshire, as evidenced in the <b>Comparison of Archaeological Evaluation Investigations on Solar Schemes report [REP4-001]</b>.</p>

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LCC-05	Cultural Heritage	Written Scheme of Investigation	Section 2.1.26 states that geophysical survey was undertaken on land newly included by the change to the Order Limits. Evaluation trenching will also be required and the results used to inform any necessary mitigation works required to adequately deal with the development impact. <i>'Areas assessed to have archaeological potential, based on consideration of all available archaeological data, were targeted with evaluation trenches within the Cottam 3b Site, both to 'ground truth' the results of previous surveys and to provide samples of 'blank' areas, in which archaeological remains had not been identified by non-intrusive methods.'</i> (sections 3.7.1, 3.13.1 and elsewhere) This was not agreed by LCC, NCC or Bassetlaw who have consistently stated that the full impact zone including the redline boundary and cable routes must be adequately evaluated by trial trenching.	<p>The Applicant believes this comment relates to the nearby Cottam Solar scheme where additional geophysical survey was completed as a result of additional land being included within the Cottam scheme as part of a change application.</p> <p>One area within the Change Application for the Scheme has an archaeological consideration. This area is located to the east of the West Burton 3 Site and was covered by the geophysical survey of the cable route in 2022 [APP-113]. Geophysical survey identified a series of anomalies interpreted as having an archaeological origin and so it is proposed to undertake a 'strip, map and sample' excavation in advance of the construction of the cable route [EN010132/EX5/WB6.3.13.7_B]. The Applicant therefore respectfully disagrees that evaluation trenching is required in this area to inform the DCO application or mitigation strategy [EN010132/EX5/WB6.3.13.7_B].</p>
LCC-06	Cultural Heritage	Written Scheme of Investigation	'Informative trial trenching' should be removed from section 6: Scope of mitigation fieldwork. Trial trenching is not a mitigation response, it is an evaluation technique. A full programme of trial trenching must be agreed across the full impact zone to an adequate level to inform the mitigation stage of archaeological work. The trenching results form the essential core of the	<p>The Applicant respectfully disagrees that trenching cannot be used as a mitigation response and highlights that trenching is commonly undertaken post-determination of planning applications as demonstrated in <b>Comparison of Archaeological Evaluation Investigations on Solar Schemes report [REP4-001]</b>. The term 'informative trenching'</p>

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			baseline evidence which provides the basis for the site-specific mitigation strategy which will need to be reasonable and proportionate.	<p>has been adopted from Schemes in Norfolk where trenching is undertaken post-determination as the first stage of mitigation.</p> <p>If the Secretary of State is minded to agree with LCC and NCC's position and identifies that there is a requirement for further trenching prior to the commencement of construction, the 'without prejudice' archaeological WSI [EN010132/EX5/WB8.2.9_A] includes a programme of further archaeological trenching, including the additional areas that were included in the Order Limits as part of the Change Application.</p>
LCC-07	Cultural Heritage	Written Scheme of Investigation	Preservation in situ areas (section 7.2) do not include mitigation measures to ensure the preservation in situ areas are protected from development works such as machine tracking or plant storage which could damage or destroy the surviving archaeology. The full extent of the archaeological areas must be determined and each area must be fenced off and subject to a programme of monitoring throughout the construction, operation and the decommissioning phases, and there will be no ground disturbance whatsoever which may disturb or affect the archaeological remains, including plant movement or storage. The fencing will need to remain in place and be maintained throughout the lifetime of the scheme. They need an Archaeological Clerk of	<p>The Applicant believes this comment relates to the nearby Cottam Solar scheme where mitigation in the form of 'areas of preservation in situ - no development' has been proposed, and identified as being suitable for ecological mitigation in the form of meadows and set aside for ground nesting birds.</p> <p>There are 10 areas within the main solar sites that are proposed for 'in situ preservation (concrete feet)' as a consequence of the presence of buried archaeological remains. It should be noted that these areas will be removed from arable activity (ploughing)—which is currently causing a high level of destruction to archaeological features—and any plant movement during the construction of the</p>

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			Works and the management strategy for the preservation in situ areas will need to be included in their CEMP to ensure the protection measures stay in place throughout the development.	Scheme is not considered to cause a greater level of impact to that currently caused by plant movement associated with agricultural activity.
LCC-08	Cultural Heritage	Written Scheme of Investigation	<p>Section 7.4.3 [of the without prejudice WSI] states that <i>'In line with the recommendation by Lincolnshire County Council Historic Environment Team for trenching across all areas of the Scheme, a further 552 untargeted trenches measuring 50m by 2m will be machine excavated (avoiding buffer zones as a result of utilities and ecological features, as well as areas where no ground disturbance will occur such as in the east of West Burton 2) (see Figures 2 to 6). Although these proposed trenches are untargeted —i.e. are not targeting features with a potential archaeological interest, they have been positioned with consideration to anomalies identified by geophysical survey, features identified by LiDAR and aerial photo mapping, and topographical changes.'</i></p> <p>Please clarify the LCC recommendation, where does the 552 trenches come from? In an attempt to reach concordance we moved from our initial 3% trenching + 1% contingency to 2% trenching in our meeting with PINS. A 2% sample of the redline boundary is approximately 1400 50m trenches. 342 trenches have been completed. The proposed trenches not</p>	<p>Paragraph 7.4.3 of the 'without prejudice' WSI [EN010132/EX5/WB8.2.9_A] has been updated in response to LCC/NCC comments, where the Applicant considers these to be acceptable. This includes the addition of the sample percentage for further trenches, which has been calculated by the Applicant to match the percentage area sample of trenching undertaken for the nearby Gate Burton Scheme, which was considered by LCC to be sufficient to inform the Gate Burton DCO application and mitigation strategy (please see the <b>Comparison of Archaeological Evaluation Investigations on Solar Schemes report [REP4-001]</b>).</p> <p>As stated above, paragraph 7.4.3 of the 'without prejudice' WSI [EN010132/EX5/WB8.2.9_A] has been updated to clarify that trenches are not targeted on features considered to have an archaeological interest based on the results of the non-intrusive evaluation.</p>

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			'untargeted' if they are targeting geophysical survey anomalies and features. Please clarify.	
LCC-09	Cultural Heritage	Written Scheme of Investigation	Also, section 7.4.6 [of the without prejudice WSI] states <i>that 'Once the detailed design of the Scheme has been finalised, in any areas where ground disturbance is not proposed, for example those areas that are being used for landscaping and ecological mitigation and enhancement, trenching would no longer be required as there would be no potential for impact to buried archaeological remains. Trenches in these locations would not be excavated.'</i> This is incorrect. Landscaping and ecological mitigation work may have an archaeological impact, for example wildlife ponds and scrapes and tree planting. Trenching will need to take place across the impact zone as development impacts from all groundworks and plant movement whether for infrastructure, solar arrays or mitigation areas may damage or destroy surviving archaeology.	Paragraph 7.4.6 of the 'without prejudice' WSI [EN010132/EX5/WB8.2.9_A] been updated to clarify the types of ecological mitigation that do not involve ground disturbance. Any ecological mitigation that would cause ground disturbance would be subject to archaeological mitigation.
LCC-10	Cultural Heritage	Written Scheme of Investigation	Section 7.4.8 [of the without prejudice WSI] states that <i>'Following excavation and recording of any archaeological remains, and with the agreement of the Lincolnshire County Council Historic Environment Team, the evaluation trenches will be backfilled with the previously excavated spoil.'</i> All areas must be signed off by curatorial agreement before backfilling can commence.	The Applicant agrees that backfilling of areas would be undertaken following agreement with the 'curator', and so has added clarity, where possible, to both versions of the WSI [EN010132/EX5/WB6.3.13.7_B] and [EN010132/EX5/WB8.2.9_A].

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LCC-11	Cultural Heritage	Written Scheme of Investigation	<p>Section 7.4.9 [of the without prejudice WSI] states that <i>'Where archaeological remains are encountered, the preference will be to preserve these in situ where possible using non-intrusive surface-mounted pre-cast concrete ground anchors.'</i></p> <p>If remains of a high significance are identified during the informative trial trenching, targeted open area excavation may be required to preserve such remains by record (see below).</p> <p>The use of ground anchors can only be used where surviving archaeology is at a depth and of a nature that would not be detrimentally impacted by the placement, settling and removal of the ground anchors. In areas of shallow deposits which encompasses much of this agricultural landscape, ground anchors would cause damage or destruction without investigation and without recording. For example on the adjacent West Burton scheme previously unexpected human remains were found in the first few days of trenching at a depth of 20cm below the ground surface.</p> <p>There would be compaction when the ground anchors are installed, settling and readjustment during the decades of operational life and ground disturbance when the ground anchors are ripped out in decommissioning as the land will need to be <i>restored 'to its preconstruction condition at the end of the operation.'</i></p>	<p>The Applicant believes this comment relates to the nearby Cottam Solar scheme. No burials were identified during evaluation trenching for this Scheme. Burials were identified within the Order Limits for the Cottam Scheme. The Applicant understands the area containing burials has been proposed for open excavation. The presence of archaeological remains in this area of the Cottam Scheme was not unexpected: archaeological features were first identified during non-intrusive evaluation works (geophysical survey) and confirmed by evaluation trenching, which provided additional information regarding the type of archaeological features that were present.</p> <p>Both the Applicant's preferred WSI [EN010132/EX5/WB6.3.13.7_B] and the without prejudice WSI [EN010132/EX5/WB8.2.9_A] contain provisions for the scope of mitigation to be reviewed if archaeological remains are identified of either a lesser or greater extent or significance than anticipated. A paragraph has been added to both versions of the WSI to reinforce this point.</p> <p>The Applicant considers concrete feet to be an appropriate form of archaeological mitigation. This matter is to be set out within the Cultural Heritage Position Statement of the Draft Statement of</p>

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			(C7.2 Outline Decommissioning Statement section 2.1.1). There is no mention of archaeology in the Outline Decommissioning Statement including Table 3.1 Decommissioning Mitigation and Management Measures.	<p>Common Ground with LCC, which will be submitted to the examination at the next suitable opportunity.</p> <p>A section focusing on 'Decommissioning' has been added to both versions of the WSI [EN010132/EX5/WB6.3.13.7_B] and [EN010132/EX5/WB8.2.9_A] and is considered to be in line with the approach to decommissioning adopted with other comparable solar schemes.</p>
LCC-12	Cultural Heritage	Written Scheme of Investigation	<p>Section 7.5.1 states that '<i>Similar to Open-Area excavation, 'Strip, Map and Sample' excavation will be employed where non-intrusive previous archaeological investigations have identified potential archaeological remains but, based on current evidence, these do not appear to be extensive or potentially significant enough to warrant Open-Area excavation</i>'.</p> <p>Not acceptable. Effective fit for purpose mitigation of the developmental impact cannot be adequately determined through non-intrusive methods alone.</p> <p>Strip map and sample excavation along with the rest of the mitigation options should be selected based on an understanding of the surviving archaeological resource across the site. Therefore, intrusive as well as non-intrusive evaluation is required. NPPF paragraphs 200 and 201 require the identification of archaeological</p>	<p>The Applicant considers the archaeological evaluation for the Scheme to be sufficient to inform the DCO application and a robust mitigation strategy (please see Statement of Common Ground with Lincolnshire County Council (LCC) [REP1-061]). The Applicant is not aware of any published local or national guidance that states a high sample of 'blanket' trenching is required to support a proposed development. Paragraph 200 of the NPPF (see below) requires a proportionate assessment both with consideration to the importance of the asset and level of impact of the proposed development to an asset's significance. The Applicant highlights the low impact of the Scheme (See paragraph 2.10.109 of NPS EN3 (November 2023)) and the positive effects that the Scheme will have on the archaeological resource through the</p>



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			<p>remains, assessment of their significance and the proposal of suitable mitigation Intrusive evaluation is essential for determining areas of archaeological mitigation Strip map and sample excavation areas will be determined from interrogation of the full suite of standard archaeological evaluation techniques including intrusive work principally trenching.</p>	<p>removal of the land within the Order Limits from regular ploughing (See paragraph 2.10.110 NPS EN3 (November 2023)) as evidenced during the evaluation trial trenching (see page 9 of [APP-120]).</p> <p>Consequently, the Applicant does not consider that there is any archaeological justification for the approach to evaluation trenching, mitigation and decommissioning requested by LCC and NCC. Sufficient information has been provided to inform the DCO application and is in line with local and national guidance, and the proposed mitigation is considered by the Applicant to be in line with the standard approach that is adopted on other comparable solar schemes (as evidenced in the <b>Comparison of Archaeological Evaluation Investigations on Solar Schemes report [REP4-001]</b>).</p> <p>Paragraph 200 of the NPPF (December 2023) states:</p> <p><i>"In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on</i></p>

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				<p><i>their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation."</i></p> <p>Paragraph 201 of the NPPF (December 2023) states:</p> <p><i>"Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal."</i></p> <p>The Applicant's position is that it has complied with the NPPF.</p>

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LCC-13	Cultural Heritage	Written Scheme of Investigation	<p>Section 7.5.3 states that <i>'An indicative sampling strategy is provided below, but if archaeological remains are identified to be less extensive or less potentially significant, then this may be subject to reduction in scope following liaison with the Lincolnshire County Council Historic Environment Team.'</i></p> <p>Again needs corresponding statement for where archaeological remains are found to be more intensive and more potentially significant. Please include Nottinghamshire County Council as well as Lincolnshire County Council.</p>	<p>As stated at LCC-11 above, both the Applicant's preferred WSI [EN010132/EX5/WB6.3.13.7_B] and the without prejudice WSI [EN010132/EX5/WB8.2.9_A] contain provisions for the scope of mitigation to be reviewed if archaeological remains are identified of either a lesser or greater extent or significance than anticipated.</p>
LCC-14	Cultural Heritage	Written Scheme of Investigation	<p>Section 7.6.1 states that <i>'An archaeological watching brief will be undertaken on specific areas of groundworks (e.g. the cable route, access roads where these require intrusive groundworks) and where topsoil stripping is required as part of the construction process (e.g. battery storage areas, sub-stations, water tanks, construction compounds, directional drilling access pits etc).'</i></p> <p>Unless a more intensive archaeological mitigation response has been identified as appropriate from the trenching results.</p> <p>Neither Nottinghamshire nor Lincolnshire agree with the rescue archaeology term 'watching brief' which implies passive monitoring of earth moving equipment. Instead, please use 'archaeological monitoring under</p>	<p>'Archaeology Watching brief' has been amended to 'Archaeological Monitoring' in both the Applicant's preferred WSI [EN010132/EX5/WB6.3.13.7_B] and the without prejudice WSI [EN010132/EX5/WB8.2.9_A], in line with recent updates to ClfA guidance. <i>"monitoring of the removal of structural remains"</i>.</p>

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			<p>archaeological control and supervision' so the archaeologist is controlling the depth of soil being moved.</p> <p>Section 7.6.3 states that <i>The archaeological monitoring of construction groundworks will include the following:</i></p> <ul style="list-style-type: none"> <li>• <i>archaeological inspection of overburden / topsoil removal</i></li> <li>• <i>monitoring of the removal of structural remains</i></li> <li>• <i>inspection of subsoil for archaeological features</i></li> <li>• <i>excavation, recording and environmental sampling of features necessary to determine their date and character'</i></li> </ul> <p>Not acceptable. Archaeological structural remains are significant and should be appropriately archaeologically excavated in proportion to their significance. Monitoring as mitigation of structural remains is entirely inappropriate.</p>	
LCC-15	Cultural Heritage	Written Scheme of Investigation	<p>Section 7.6.5 states that <i>'Every effort will be made to implement the archaeological watching brief without affecting the construction timetable, however, some limited suspension of groundworks in specific areas of the Scheme under investigation may be required in order to record and sample any archaeological evidence uncovered (in line with the 'Strip, Map and Sample' methodology provided in this</i></p>	<p>The Applicant considers the archaeological evaluation for the Scheme to be sufficient to inform the DCO application and a robust mitigation strategy (please see <u>the</u> Cultural Heritage Position Statement appended to the Statement of Common Ground with LCC [REP1-061]). The Applicant respectfully disagrees that Paragraph 7.6.5 is <i>'an excellent illustration of why sufficient evaluation is required in advance of finalisation of scheme details'</i></p>

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			<p><i>WSI). The length of stoppage time will be determined by the nature of archaeological features or deposits identified'.</i></p> <p>This paragraph is an excellent illustration of why sufficient evaluation is required in advance of finalisation of scheme details, and of any work programme. Sufficient evaluation will mean that site specific mitigation can be determined and built into the work programme and schedule, thus reducing the risk to the construction programme this paragraph implies.</p> <p>Section 7.6.6 states that '<i>Where it can be demonstrated that survival conditions are such that archaeological potential is negligible, the Lincolnshire County Council Historic Environment Team will be informed and, where necessary, the watching brief suspended.</i>'</p> <p>Not agreed. This paragraph demonstrates a lack of understanding on the nature of archaeology. There may be a blank area for 50 metres then a number of unexpected burials, at what point should the watching brief be suspended and what specific area be excluded and then recommenced?</p> <p>Please clarify.</p>	<p>and Paragraph 7.6.6 "<i>demonstrates a lack of understanding on the nature of archaeology</i>". The Applicant disagrees with the assertion from LCC and NCC that trenching is an absolute technique in determining the potential for buried archaeological remains. For example, if a 2% sample of trenching is undertaken, as requested by LCC, this would mean 98% of the site is not sampled and so a level of 'risk' would still be present.</p> <p>The Applicant considers it to be standard practice for archaeological monitoring (watching brief) to be suspended in specific areas where the archaeological potential is proven to negligible, and continuing the archaeological monitoring is futile, as stated in paragraph 7.7.6 of the Without Prejudice WSI [EN010132/EX5/WB8.2.9_A] (paragraph 7.6.6 of the preferred WSI [EN010132/EX5/WB6.3.13.7_B]). For example, this would apply if areas containing made ground or heavy disturbance were encountered where there was no potential for the survival of archaeological remains.</p>

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LCC-16	Cultural Heritage	Written Scheme of Investigation	<p>Regarding geoarchaeological assessment (sections 3.6, 3.18, 3.29) and paleoenvironmental sampling (section 7.9) advice should be sought from Matthew Nicholas, Historic England's regional science advisor.</p> <p>Section 7.11.12 states that <i>'Where areas of the Scheme or parts of individual sites have been shown to contain no archaeological remains following stages of archaeologically monitored top-soil stripping, or where specific areas of the Scheme have been fully archaeologically excavated, agreement will be sought with the Lincolnshire County Council Historic Environment Team to allow for construction groundworks to proceed in these specific areas.'</i></p> <p>Please include Nottinghamshire County Council here and throughout the document where agreement is to be reached.</p>	<p>Paragraph 7.9.4 of the Without Prejudice WSI [EN010132/EX5/WB8.2.9_A] and the preferred WSI [EN010132/EX5/WB6.3.13.7_B]) states: <i>"If required a qualified and experienced palaeoenvironmental specialist will undertake site visits to discuss the sampling strategy and, if necessary, assist in any required fieldwork, and the appropriate advice of the Historic England Regional Science Advisor will be sought."</i></p> <p>It is understood by the Applicant that the Historic Environment Team provide archaeological advice for the Bassetlaw district in Nottinghamshire and the West Lindsey district in Lincolnshire. To allow for flexibility within local planning authorities, the phrase 'Lincolnshire County Council Historic Environment Team' has been replaced with the phrase 'Archaeological Advisor to the relevant Local Planning Authority' throughout. The Applicant would, however, highlight that it is uncustomary for the County Archaeologist for Nottinghamshire to request jurisdiction over archaeological works in Lincolnshire.</p>
LCC-17	Cultural Heritage	Written Scheme of Investigation	<p>Section 7.12.1 states that <i>'Should unexpectedly extensive, complex or significant remains be uncovered that warrant, in the professional judgment of the archaeologists on site, more detailed recording or extensive excavation than is</i></p>	<p>As detailed above, the Applicant respectfully disagrees that the risk has not been appropriately managed and considers the archaeological evaluation for the Scheme to be sufficient to inform</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p><i>appropriate in the terms of this WSI, the scope of the WSI will be reviewed.'</i></p> <p>This paragraph shows that the risk has not been managed appropriately at the evaluation stage as previously stated.</p> <p>Regarding the figures, we have grave doubts regarding interpretation of the air photo and LIDAR features, for example Figure 4 which identifies banks as Post Medieval. Without intrusive investigation it is impossible to know the dates of these features. Some of these features do not align with Post Medieval field boundaries and some look like they may be part of Medieval settlement.</p> <p>These are mitigation strategies proposed on the basis of inadequate intrusive field evaluation. If accepted they would pose an unacceptable precedent for two counties with huge potential to deliver sustainable energy demand, there is no public benefit in it being at the expense of the loss of unknown inadequately evaluated archaeology across thousands of hectares.</p>	<p>the DCO application and a robust mitigation strategy (please see the Statement of Common Ground with Lincolnshire County Council (LCC) [REP1-061]).</p> <p>Both the Applicant's preferred WSI and the without prejudice WSI ([EN010132/EX5/WB6.3.13.7_B] and [EN010132/EX5/WB8.2.9_A] respectively), have been updated to highlight the programme of aerial photographic and LiDAR mapping and interpretation was undertaken by a nationally recognised leading expert in aerial photographic and LiDAR analysis, who has worked extensively for numerous key organisations including English Heritage and Historic England. The Applicant therefore has a high confidence in the interpretation.</p>

Lincolnshire County Council [REP4-079]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
LCC-19	Draft DCO	Articles	<p>Agenda Item 5(b)</p> <p>1.1. LCC made representations in relation to the operation of Articles 11 and 15. In both articles, there is a split between parts of the project listed within the relevant schedule, in relation to which LCC is proposed to be 'consulted' and those parts of the project which are not listed and LCC will be able to 'consent' such works. LCC considers that its approval or consent should be required for all elements.</p> <p>1.2. It is important for LCC to retain oversight and control of works in the highway and traffic regulation measures brought into effect across the area. LCC operates a consenting and permitting process for such works and measures which involves the payment of a fee and particular procedures which ensure that conflicting works and measures are not brought into effect at the same time. If LCC is merely 'consulted', no one body will have overall control as to potentially conflicting measures being implemented on the highway at the same time.</p> <p>1.3. Post ISH2, LCC and the Applicant have continued to discuss the Applicant's proposal to include a mechanism for LCC's approval within the CTMP. Such discussions are ongoing and the ExA will be kept</p>	<p>Please refer to the Applicant's response to Second Written Question 2.5.3 [EX5/WB8.1.34].</p>



Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			informed as to whether this resolves LCC's objection on this matter.	
LCC-20	Draft DCO	Fees	<p>Agenda Item 6(e)</p> <p>1.4. Schedule 17(5) relates to fees. LCC note and welcome the Applicant's commitment to update this provision.</p>	<p>The Applicant notes this comment, and refers to Schedule 17 of the draft DCO [EN010132/EX5/WB3.1_F].</p> <p>For further information, please refer to agenda item 6E of the <b>Written Summary of the Applicant's Oral Submissions &amp; Responses at Issue Specific Hearing 2</b> [REP4-067].</p>
LCC-21	Draft DCO	Requirements	<p>In the alternative, LCC seeks a more robust requirement along the lines of the following:</p> <p><i>"(1) No development may commence until an overarching Archaeological Mitigation Scheme has been submitted and approved by the relevant Planning Authorities, such approval to be in consultation with Historic England;</i></p> <p><i>(2) No phase of the authorised development may commence, and no part of the permitted preliminary works for that phase may start, until a supporting Written Scheme of Investigation for that phase has been submitted to and approved in writing by the relevant Planning Authorities, such approval to be in consultation with Historic England.</i></p>	<p>Please refer to the Applicant's response to Second Written Question 2.5.10 [EN010132/EX5/WB8.1.34].</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p><i>(3) The approved scheme must— (a) identify areas where archaeological work is required; and (b) the measures to be taken to protect, record or preserve any significant archaeological remains that may be found (i.e. preservation in situ, preservation by record or mix of these elements).</i></p> <p><i>(4) Pre-construction archaeological investigations and pre-commencement material operations which involve intrusive ground works may take place only in accordance with the approved Written Scheme of Investigation and any archaeological works must be carried out by a suitably qualified and competent person or body previously notified to the relevant planning authority"</i></p>	
LCC-22	Planning Policy	NPSs	<p>ISH 3 Agenda item 3a – National Policy Statements.</p> <p>2.1. LCC agrees that more than the “some” weight referred to within its response to first written questions, should be afforded to the NPSs following designation.</p>	<p>The Applicant notes this comment. Please refer to the Applicant's response to comment GC-01 in <b>WB8.1.23 The Applicant's Response to Deadline 2 and 3 Submissions [REP4-066]</b> and <b>WB7.5_B Planning Statement Revision B [REP4-048]</b>.</p>
LCC-23	The Scheme	Waste	<p>Agenda item 4</p> <p>2.2. In relation to the failure of panels, LCC notes that this is likely to generate a significant amount of waste and wishes the ExA to note that the Council intends to make further representations on waste capacity at the appropriate time.</p>	<p>The Applicant notes this comment. Matters discussed at Issue Specific 5 have been summarised and addressed in <b>WB8.1.32 Written Summary of the Applicant's Oral Submissions at the Issue Specific Hearing (ISH5) [EN010132/EX5/WB8.1.32]</b>.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
LCC-24	Statement of Common Ground	Landscape	<p>Agenda item 5</p> <p>2.3. LCC agreed with the Applicant's summary of progress made to narrow issues between the parties on this topic. LCC confirmed that we have had a good dialogue with Applicant throughout Examination stage, working with them to identify key issues to work together to produce a SOCG. LCC has received relevant documents from the Applicant and is in the process of reviewing those as part of the continued dialogue.</p> <p>2.4. LCC will comment on the Applicant's updated effects tables at DL4.</p>	<p>The Applicant notes this comment.</p> <p>2.3 and 2.4: A further meeting was arranged with LCC for Thursday 21 March 2024 to discuss the Statement of Common Ground and narrow issues between the parties on this topic. Following the meeting on 21 March 2024, an updated (V2) SoCG was issued by the Applicant to LCC on Friday 22 March 2024 setting out the latest position. A version of the Supplementary Landscape Effects Tables was also issued to LCC on 22 March 2024 setting out in detail those matters agreed and matters not agreed (to presented with the final SoCG), and LCC then issued a further update on Thursday 4 April 2024 which included their revised comments on the SoCG and also clarity/comment on the visual effects. LCC were satisfied that this latest provides enough detail to progress the SoCG for the 11 April 2024 DL5 deadline, and then LLC would subsequently be in a position to finalise the landscape section of the SoCG in good time prior to the DL6 deadline of 30 April 2024.</p>
LCC-25	Soils and Agriculture	Draft DCO Socio-Economics	<p>Agenda item 6 – Soils</p> <p>2.5. The Applicant's position is that the soils are not sterilized as they are still "available" for agriculture. However, this is far too simplistic. The land is clearly not available in the same way or to the same extent as</p>	<p>2.5 &amp; 2.7:</p> <p>In 2005, the UK started transition away from arable area payments towards 'Cross Compliance' under the EU Common Agricultural Policy. Cross compliance provides farm support for</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>it is at present. The land is current available for food production and crops. If the scheme is implemented, some of the land would be available for sheep, but (1) this is not secured within this DCO so it is only a mere possibility, (2) the land would only be available for sheep and for no other form of agriculture and (3) is not an intensive form of food production but instead the sheep are largely used for "keeping tidy" or maintenance of the grass cover.</p> <p>2.6. The impact on local farming and linked businesses could be significant. There are likely to be cumulative impacts on local agricultural businesses such as merchants and machinery suppliers.</p> <p>2.7. The loss of total crop yield over 60 years is significant in LCC's view. Even more so when the cumulative effects are considered.</p>	<p>environmental goods and services, decoupling support from agricultural production. Post 2016, UK nations are continuing to tie farm support to environmental goods and services and not to agricultural production. Under arable area payments, farmers were obliged to place 10% of their arable area into "setaside", with no economic use of the land permitted. Farmers were also unable to establish a green cover over setaside so the land could not benefit from a recovery of soil health under fallow. During this period of mandatory 10% setaside of all arable land nationwide, no significant impacts on agricultural businesses such as merchants and machinery suppliers, were observed. The concerns raised by LCC regarding the significantly smaller extent of the proposed solar farms are therefore, in the Applicant's view, overstated. The Applicant respectfully disagrees with LCC's statement that the "loss of total crop yield over 60 years is significant".</p> <p>It is noted that the ES has been prepared on the basis that land would be available for sheep grazing – the Outline Landscape and Ecological Management Plan [REP4-044] makes allowance for this, at paragraph 4.8.8. The assessment presented in Chapter 19 of the ES [APP-057] is not reliant on</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				<p>the ongoing use of the land for grazing to reach its conclusions on likely significant effects, rather it is a management tool during operation (to manage the growth of grass).</p> <p>2.6:</p> <p>The Applicant respectfully disagrees and refers to its response to ExA's Q1.13.5 in <b>WB8.1.21 Applicant Response to ExA First Written Questions [REP3-038]</b>.</p>
LCC-26	Cultural Heritage	Archaeology	<p>ISH 4 Agenda item 3 – Heritage</p> <p>3.1. LCC and the Applicant remain some distance apart in relation to the appropriate level of trial trenching to be undertaken. LCC's position is that the Applicant has currently only undertaken 2% of trenching on 21% of the entire site, leaving almost 80% entirely unevaluated. The results of further investigations are required to inform a meaningful WSI. At present, any discussion of mitigation is premature other than in relation to the small portion of the site where trenching has occurred. The Applicant is strongly encouraged to undertake trenching in order to inform a meaningful WSI. At present, LCC's position is that the ExA has insufficient information to approve the WSI and the application fails to meet relevant policy and guidelines.</p>	<p>Please refer to the Applicants responses at reference LCC-01 to LCC-06 above.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>3.2. Both LCC and NCC are aligned on this issue.</p> <p>3.3. Nevertheless, LCC will engage on a without prejudice basis in relation to a further draft of the WSI which the Applicant undertook to provide to LCC in good time for DL4.</p>	
LCC-27	Transport and Access	Access Abnormal Loads	<p>Agenda item 4a – Transport</p> <p>3.4. In respect of ExA written questions to LCC for abnormal loads the Council procedure for developments such as this, is that the routes for abnormal loads should be identified by the developer. Details the Council require include the proposed routes, approximate size, width, height, weight and anticipated vehicle configuration of the abnormal load.</p> <p>3.5. The Council can check its asset inventory and comment on suitability. If the Council are concerned with any structure along the route with regards structural capacity, the structure should have a structural assessment carried out to confirm suitability. This is to be paid for by the developer (the Council is content for the assessment to be carried out by a third party consultant as long as the design assessment criteria is agreed via CG300 – Approval in Principal with the Council as TAA (Technical Approval Authority).</p> <p>3.6. The developer should also carry out a route survey and highlight any LCC street furniture that may require</p>	<p>3.4.</p> <p>Information on Abnormal Indivisible Load (AIL) movements is set out in Section 7 of the <b>6.3.14.1_A ES Appendix 14.1 Transport Assessment [REP4-036]</b> and Section 6 of the <b>6.3.14.2_B ES Appendix 14.2 Outline Construction Traffic Management Plan Revision D [REP4-038]</b>. This sets out information on the routes and the approximate size, width, height, weight and anticipated vehicle configuration of the abnormal load. The Abnormal Loads Report, prepared by Wynns, is shown in Appendix F of the <b>6.3.14.1_A ES Appendix 14.1 Transport Assessment Revision C [REP4-036]</b>.</p> <p>As set out in Section 7 point iv of the <b>6.3.14.2_B ES Appendix 14.2 Outline Construction Traffic Management Plan Revision D [REP4-038]</b>, <i>“Traffic management for abnormal load movements will be agreed with the local highway authority and police prior to the abnormal load movements taking place”</i>.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>temporary removal to facilitate an abnormal load movement. It is common for a swept path analysis to be undertaken by the developer/ haulier to confirm if items need to be temporarily removed. The Council require at least 8 weeks notice upon receipt of payment programme any accommodation works to facilitate an abnormal load movement.</p>	<p>The preparation, approval and implementation of a final CTMP is secured through requirement 15 of Schedule 2 to the DCO [EX5/WB3.1_F].</p> <p>3.5.</p> <p>A number of structural assessments are reported by Wynns in their report contained within Appendix F of the <b>6.3.14.1_A ES Appendix 14.1 Transport Assessment Revision C [REP4-036]</b>.</p> <p>Paragraph 6.12 of the CTMP [REP4-038] states: <i>"For the structure reviews, should any issue arise, the following measures will be explored:</i></p> <ul style="list-style-type: none"> <li>• <i>Alternative trailer arrangements to spread the load;</i></li> <li>• <i>Temporary or permanent relieving measures".</i></li> </ul> <p>It should be noted that the structural assessments have all been concluded and have all passed for the required loads with Lincolnshire County Council having agreed and signed the Check Certificates during March 2024. (Copies of the assessment reports can be made available if required.)</p> <p>3.6.</p> <p>The Routes were reviewed by Wynns, as set out in their report at Appendix F of the <b>6.3.14.1_A ES</b></p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				<p><b>Appendix 14.1 Transport Assessment [REP4-036].</b> As set out in Section 7 point iv of the <b>6.3.14.2_B ES Appendix 14.2 Outline Construction Traffic Management Plan Revision D [REP4-038]</b>, <i>"Traffic management for abnormal load movements will be agreed with the local highway authority and police prior to the abnormal load movements taking place"</i>.</p> <p>This has included undertaking Swept Path Assessment to confirm access requirements where necessary.</p> <p>The Applicant notes the timescales referred to by LCC.</p>



West Lindsey District Council [REP4-081]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
WLDC-01	General	Issue Specific 4	<p>During Issue Specific Hearing 4 (ISH4): Issues Specific Hearing on Environmental Matters a discussion was held on the current content of 'Management Plans' and the extent to which they address a scenario where more than one Nationally Significant Infrastructure Project (NSIP) solar generating station project is constructed concurrently within the West Lindsey District.</p> <p>The table below sets out an indicative structure for comment and further discussion with the applicant.</p>	<p>The Applicant notes this comment and has responded to each point in turn below.</p>
WLDC-02	Transport and Access	Construction Traffic Management Plan	<p>Explains the scope, purpose and objective of the plan, to include:</p> <ul style="list-style-type: none"> <li>• the management of all freight traffic associated with two or more projects – heavy goods vehicles (HGVs), light goods vehicles (LGVs) and abnormal indivisible loads (AiLs)</li> <li>• The purpose to prioritise the safe, efficient delivery of strategic cumulative (impacts associated with two or more solar generating station projects within West Lindsey District) construction traffic, whilst minimising delay to the</li> </ul>	<p>The <b>Outline Construction Traffic Management Plan (oCTMP) Revision D [REP4-038]</b> provides 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. It is an evolving document that has been, and will continue to be updated to reflect the outcomes of discussions between the Applicant and the local highways authorities and other Interested Parties during the Examination of the Scheme, and to add detail that arises from the post-determination procurement and Engineering Principal Contractor (EPC) appointment.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>travelling public and amenity impact on local communities.</p> <ul style="list-style-type: none"> <li>• Approach to reporting and public awareness (see below)</li> </ul>	<p>A Final CTMP, substantially in the same form as this Outline CTMP, will be approved by the relevant planning authorities in consultation with the Local Highway Authorities prior to construction commencing, as is secured through requirement 15 of Schedule 2 to the DCO [EN010132/EX5/WB3.1_F].</p> <p>The oCTMP provides information on the following:</p> <ul style="list-style-type: none"> <li>• Construction methodology;</li> <li>• Site access;</li> <li>• Construction vehicle trip generation;</li> <li>• Construction vehicle routing;</li> <li>• Abnormal load movement; and</li> <li>• Mitigation and management measures.</li> </ul> <p>In relation to minimising cumulative effects, measure 'xxv' in Section 7 of the oCTMP [REP4-038] states: <i>"In the event that the construction schedules associated with this Scheme and other schemes in the area overlap (being the Cottam Solar Project, the Gate Burton Solar Project, and the Tillbridge Solar Project), a joint Construction Traffic Management Plan (Joint CTMP) could be produced. Other schemes that come forward in the area could be included as appropriate. The Joint CTMP would set out construction traffic management</i></p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				<p><i>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 relation to community engagement, measures 'xxii' and 'xxiii' in Section 7 of the oCTMP [REP4-038] states: <i>"The details of the Construction Site Manager will be provided to the local highway authority in advance of any work being carried out. The Construction Site Manager's details will also be provided on a Site-board at the Site accesses. If anyone in the local community has any issues during the construction phase, the Site Manager will be available to discuss".</i></p> <p>In relation to monitoring and reporting, measure 'xxiv' in Section 7 of the oCTMP [REP4-038] states: <i>"Any unforeseen issues that arise in relation to construction vehicle movement will be logged by the Site Manager. If necessary, the issues will be discussed with the local highway authority so that they can be resolved as appropriate".</i></p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
WLDC-03	Transport and Access	Construction Traffic Routes	<ul style="list-style-type: none"> <li>• The identification of the defined construction traffic routes, as assessed in the project specific Environmental Statement, including the routes to be used by more than one solar generating station project during construction.</li> <li>• An explanation of the appropriateness of the routes selected.</li> </ul>	Information on the routes selected for construction vehicles is set out in Section 5 of the <b>Outline Construction Traffic Management Plan (oCTMP) Revision D [REP4-038]</b> and Section 6 of the <b>6.3.14.1_D ES Appendix 14.1 Transport Assessment Revision D [REP4-038]</b> . A cumulative assessment is set out in Section 10 of the Transport Assessment and within Section 14.9 of the <b>6.2.14 Environmental Statement – Chapter 14_Transport and Access [APP-052]</b> .
WLDC-04	Transport and Access	Abnormal Loads	<ul style="list-style-type: none"> <li>• To provide the details of quantum of AiL movements required and the cargo.</li> <li>• To confirm details of the AiL routes.</li> <li>• Confirm any lay-down areas</li> <li>• Convoy sizes</li> </ul>	Please refer to the response to LCC-27  Further details, including lay-down areas will be in the Final CTMP, secured through <b>requirement 15 of the DCO [REP4-024]</b> .
WLDC-05	Transport and Access	Traffic Management	<ul style="list-style-type: none"> <li>• Define the strategy for the delivery of construction traffic to serve more than one solar generating station project.</li> </ul>	Please refer to the answer to WLDC-02.
WLDC-06	Transport and Access	Delivery Times	<ul style="list-style-type: none"> <li>• Define the appropriate cumulative construction traffic delivery times for each project.</li> <li>• Confirm time when AiL trips are to occur (e.g. during daylight hours).</li> </ul>	Please refer to the answer to WLDC-02, WLDC-04 and LCC-27.

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
WLDC-07	Transport and Access	Public awareness	<p>Production of a co-ordinated public awareness strategy for more than one project. Designation of a single co-ordinator to manage construction traffic for each project. To be responsible for:</p> <ul style="list-style-type: none"> <li>• Liaising with each development project;</li> <li>• Responsible for forward planning of activities and trips, and associated records for LPAs/stakeholders;</li> <li>• Responsible for dissemination of information (Websites/social media/emails etc) to the community ahead of cumulative activities.</li> <li>• Notification of any potential delays on local roads.</li> </ul>	<p>Measures 'xxii' and 'xxiii' in Section 7 of the <b>Outline Construction Traffic Management Plan (oCTMP) Revision D [REP4-038]</b> state: <i>"The details of the Construction Site Manager will be provided to the local highway authority in advance of any work being carried out. The Construction Site Manager's details will also be provided on a Site-board at the Site accesses. If anyone in the local community has any issues during the construction phase, the Site Manager will be available to discuss"</i>.</p>
WLDC-08	Transport and Access	Highway Improvements	<ul style="list-style-type: none"> <li>• Description of highway improvements required to facilitate delivery of construction component and general traffic</li> <li>• Identification of cumulative locations for improvement. • Identification of <i>[incomplete sentence in the representation]</i></li> </ul>	<p>Construction site access arrangements are set out in Section 3 of the <b>Outline Construction Traffic Management Plan (oCTMP) Revision D [REP4-038]</b>.</p> <p>Paragraph 3.5 of the oCTMP states, <i>"Prior to carrying out any works to the public highway pursuant to Articles 9, 10, 11 and 13 of the DCO, the detailed design of such works must be submitted to the highway authority for approval"</i></p> <p>Paragraph 3.15 of the oCTMP states, <i>"Accesses 110 - 112 form part of the Shared Cable Route Corridor between the Scheme, Gate Burton Scheme and Cottam"</i></p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				<i>Scheme. If the construction periods for the respective schemes overlap, including within the Shared Cable Route Corridor, a Joint Construction Traffic Management Plan (Joint CTMP) could be produced. This will set out construction traffic management and control measures relevant to those areas where the construction vehicle routes for the respective schemes overlap, to reduce and manage any potential cumulative effects"</i>
WLDC-09	Transport and Access	Abnormal Loads	<ul style="list-style-type: none"> <li>• Details of the assessment of all structures that may be subject to the gross vehicle weight of abnormal loads.</li> <li>• Identification of any strengthening measures required.</li> <li>• Identification of listed structures that may be affected.</li> <li>• Identification of any condition surveys required.</li> </ul>	<p>Please refer to the answer to WLDC-04 and LCC-27.</p> <p>A number of structural assessments are reported by Wynns in their report contained within Appendix F of the <b>C6.3.14.1_A ES Appendix 14.1 Transport Assessment [EN010132/EX4/WB6.3.14.1_C]</b>.</p> <p>Paragraph 6.12 of the CTMP states <i>"For the structure reviews, should any issue arise, the following measures will be explored:</i></p> <ul style="list-style-type: none"> <li>• <i>Alternative trailer arrangements to spread the load;</i></li> <li>• <i>Temporary or permanent relieving measures"</i>.</li> </ul> <p>Further details will be in the Final CTMP, secured through <b>requirement 15 of the DCO [EN010132/EX4/WB3.1_F]</b>.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
WLDC-10	Transport and Access	EIA	<ul style="list-style-type: none"> <li>• Confirmation that cumulative traffic movements will be within eh [sic] scope of the assessed EIAs</li> <li>• Confirmation/signposting of the relevant mitigation or each project.</li> </ul>	A cumulative assessment is set out in Section 10 of the Transport Assessment and within Section 14.9 of the <b>6.2.14 Environmental Statement – Chapter 14_Transport and Access [APP-052]</b> . A review of the potential cumulative effects of additional schemes has been carried out, as described in Section 3.9 of the ES Addendum on Cumulative Effects [EN010132/EX5/WB8.4.23.1].
WLDC-11	Transport and Access	Mitigation and Monitoring	<ul style="list-style-type: none"> <li>• Explanation of the approach to the monitoring, reporting a review of cumulative construction traffic.</li> </ul>	Please refer to the answer to WLDC-02.

West Lindsey District Council [REP4-082]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
WLDC-12	Summary of Issue Specific 4	Cultural Heritage	<p>WLDC notes the applicant's update and that this matter is to be considered at a future Issue Specific Hearing.</p> <p>WLDC maintains a strong objection to the scheme due to the substantial harm caused to the Medieval bishop's palace and deer park, Stow Park Scheduled Monument.</p> <p>WLDC notes that Historic England, Lincolnshire County Council and Nottinghamshire County Council all also maintain strong objections to the project on cultural heritage grounds.</p>	<p>The Applicant notes this comment. Please refer to agenda item 3 in the <b>Written Summary of the Applicant's Oral Submissions at the Issue Specific Hearing 5 [EN010132/EX5/WB8.1.32]</b>.</p> <p>The Applicant understands objections from Historic England solely relate to panels within the Stow Park Deer Park which is located in the east of the West Burton 3 Site, and objections from NCC and LCC relate to the extent of evaluation trial trenching undertaken within the Scheme. For further information, please refer to the latest statements of common ground with these parties:</p> <p>Draft Nottinghamshire County Council and Bassetlaw District Council SoCG [EN010132/EX5/WB8.3.8_A]; Draft Historic England SoCG [REP1-063]; and Cultural Heritage Position Statement on Stow Park, submitted at Deadline 5 [EN010132/EX5/WB8.2.10] Draft with Lincolnshire County Council SoCG, which will be submitted to the examination at the next suitable opportunity.</p>
WLDC-13	Summary of Issue Specific 4	Transport, Noise and Air Quality	<p>WLDC maintain their request for a proposed approach to require co-ordinated joint working between developers in the event that two or more</p>	<p>Construction traffic impacts will be managed through the <b>Construction Traffic Management Plan Revision D [REP4-038]</b> which is secured through</p>



Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>projects are constructed concurrently. WLDC has provided under a separate cover at this deadline, a suggested framework for a coordinated management document for discussion. If agreed, the framework could be appended to the oCTMP.</p> <p>WLDC has provided the applicant with a response to the outstanding noise issues to be reflected in the forthcoming SoCG.</p>	<p><b>requirement 15 of the DCO [REP4-024]. The Construction Traffic Management Plan Revision D [REP4-038]</b> sets out that there is the potential for a joint CTMP to be produced post-consent, once further details about the construction timetables for the Gate Burton, Tillbridge and Cottam schemes are known.</p> <p>In relation to the framework submitted by WLDC <b>[REP4-081]</b>, please refer to the Applicant's responses at WLDC-02 to WLDC-11 above.</p>
WLDC-14	Summary of Issue Specific 4	Socio-Economic and Health	<p>WLDCs raises the following issues with regard to the consideration of health impacts.</p> <p>The 500m buffer area failing to capture the wider community that will experience the impacts of the project during construction, operation and decommissioning.</p> <p>The requirement for a Health Impact Assessment (HIA) Report to be produced alongside the EIA chapter. A HIA is separate from an EIA assessment.</p> <p>The EIA assessment follows the IEMA guidance and constraints itself by defining its scope by other EIA assessment topics. WLDC consider that a HIA should consider the impacts in an unconstrained manner and should feed back its own consideration into other topic areas.</p>	<p>The Applicant notes this comment.</p> <p>Matters discussed at Issue Specific 4 have been summarised and addressed at Agenda item 5 in <b>WB8.1.28 Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 4 and Responses to Action Points [REP4-071]</b>.</p> <p>Please refer to the Applicant's response to Second Written Question 2.6.1 <b>[EN010132/EX5/WB8.1.34]</b></p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			The impacts on health should also not simply be those considered as 'likely significant' effects as required by the EIA regulations. The scope should be wider to capture impacts that, although may be calibrated as being under the 'significant' threshold, will still be impacts that should be identified and mitigated. The role of a stand-alone (non-EIA) HIA would be to capture all impacts and demonstrate policy compliance in the context of the planning balance. The reliance on an EIA to remove the requirement of a HIA is flawed, unless it can be demonstrated that a precautionary approach has been taken and that all impacts have been identified, assessed and mitigated.	
WLDC-14	Summary of Issue Specific 4	Cumulative Impacts	Matter not discussed. To be rescheduled for a later Issue Specific Hearing	The Applicant notes this comment. Matters discussed at Issue Specific 5 have been summarised and addressed in <b>WB8.1.32 Written Summary of the Applicant's Oral Submissions at the Issue Specific Hearing (ISH5) [EN010132/EX5/WB8.1.32]</b> .
WLDC-15	Actions for WLDC at Issue Specific Hearing 4	Noise	To work through WLDC concerns regarding Noise Survey methodology (41pprox.. 12 concerns set out in WLDC Local Impact Report and elsewhere).  The applicant has provided WLDC with additional information and have met to discuss the matter. Progress has been made to resolving many of the	The Applicant notes this comment and confirms progress is being made in agreeing matters, as is set out in the latest <b>WB8.3.2_A West Lindsey District Council SoCG [EN010132/EX5/WB8.3.2_A]</b> .

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			matters and these will be presented in the next version of the Statement of Common Ground.	
WLDC-16	Actions for WLDC at Issue Specific Hearing 4	Management Plans	<p>To provide wording for consideration by the Applicant within various Management Plans.</p> <p>WLDC have produced an indicative structure for a proposed co-ordinated approach to the management of construction traffic. This has been submitted at Deadline 4. WLDC will continue to discuss with the applicant to seek agreement on an approach to be included in the oCTMP.</p>	<p>The Applicant confirms that these updates were included in the versions of the key management plan documents (oCEMP [REP4-042], oOEMP [REP4-054], oCTMP [REP4-038] at Deadline 4.</p> <p>In relation to the framework submitted by WLDC [REP4-081], please refer to the Applicant's responses at WLDC-02 to WLDC-11 above.</p>

West Lindsey District Council [REP4-083]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
WLDC-17	Summary of Issue Specific 3	General and Cross-Topic	<p>WLDC noted and agree that the published revised versions of National Policy Statements (NPS) should now be afforded more weight than the previous drafts, and should be an important and relevant consideration for the determination of the West Burton Solar Project under section 105 of the Planning Act 2008.</p> <p>NPS EN-3 confirms that solar is a key part of the government's strategy for low-cost decarbonisation of the energy sector (para. 3.10.1). Solar has an important role in delivering the government's goals for greater energy independence and that the British Energy Security Strategy states that the government expects a five-fold increase in solar deployment by 20235 [sic] (up to 70GW) (para. 3.10.2).</p> <p>In delivering solar development of a NSIP scales to attain those targets. WLDC contends that there is significant responsibility upon developers to bring forward projects that are well located, well designed in terms of layout and demonstrate that this process delivers the benefits whilst minimising environmental impacts and impacts upon communities. This responsibility is even greater where there are a number of projects located close</p>	<p>The Applicant notes this comment. Please refer to the Applicant's response to comment GC-01 in <b>WB8.1.23 The Applicant's Response to Deadline 2 and 3 Submissions [REP4-066]</b> and <b>WB7.5_B Planning Statement Revision B [REP4-048]</b>.</p> <p>On project design, please refer to the Applicant's response to comment LAN-01 in <b>WB8.1.23 The Applicant's Response to Deadline 2 and 3 Submissions [REP4-066]</b>.</p> <p>On project lifetime, the Applicant provided at Deadline 1 <b>8.2.3 Review of Likely Significant Effects at 60 Years [REP1-060]</b> which considers the implications of having a 60 year operational phase by environmental matter topic in the ES.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>together in the same area, such is the situation here with the West Burton Solar Project in the West Lindsey District.</p> <p>Some key matters regarding project design includes:</p> <p>Project design – a requirement to demonstrate how good design principles have been applied throughout the project. Applicants should consider taking independent professional advice on the design aspects of a proposal, including seeking the advice of the Design Council (EN-1 section 4.6). The West Burton Solar Project application details a site selection approach that is founded upon achieving the capacity of the grid connection secured by the applicant. Whilst seeking to avoid high sensitivity constraints, there are no established design principles relating to what 'good design' of solar farms entails with regard to the layout of the project, including the importance of achieving development contiguously (i.e. a single coherent site that minimises the spread of impacts). WLDC maintains, logically, that the dispersed layout of the West [sentence incomplete]</p> <p>Project lifetime – an upper limited of 40 years is typical, although applicants may seek consent for different time periods (EN-3 para. 3.10.56). This</p>	

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			application now, following statutory consultation and an assessed EIA scope of 40 years, seeks to increase this lifetime by 50% to 60 years although has not re-assessed the impacts of this change so that all parties can understand how this significant increase in the lifetime (to become effectively a permanent development) has been considered.	
WLDC-18	Summary of Issue Specific 3	General and Cross-Topic	<p>WLDC understands the requirement for the reasonable replacement of faulty panels under the definition and provisions of maintenance in the draft Development Consent Order (dDCO).</p> <p>Notwithstanding the discussion in the hearing, WLDC maintains concerns regarding the likely failure rate of panels (beyond a typical 25 year warranty) and BESS infrastructure, particularly during the additional 20 year lifespan now being sought by the applicant following the submission of the application. The applicant states that the increase in the lifespan would result in an increase in the amount of the project panel requiring replacement to 24% of the overall project. This could equate to around 100Ha of the project being subject to replacement (re-construction) which would constitute an NSIP-scale project in its own right. This replacement activity is likely to give rise to significant environmental effects (especially as</p>	<p>The Applicant refers to a previous response made covering the topic of the Replacement of Panels in reference WAS-02 in <b>The Applicant's Responses to Relevant Representations [REP1-050]</b>.</p> <p>For further details of previous submissions made by the Applicant on this matter, please refer to agenda item 5A of the Written Summary of the Applicant's Oral Submissions &amp; Responses at Issue Specific Hearing 2 <b>[REP4-067]</b> and agenda item 4(a) of the Written Summary of the Applicant's Oral Submissions at Issue Specific Hearing 3 <b>[REP4-070]</b>.</p> <p>Please refer to the Applicant's response to Second Written Question 2.9.3 <b>[EN010132/EX5/WB8.1.34]</b></p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			the frequency and extent of the replacement is unknown), particularly in relation to traffic, noise, air quality and waste. Should all projects currently in the planning system be consented and require the same ratio of 'replacement' and at similar times in the operational cycle of the projects, the impacts on the environment could be significant and adverse. This scenario has not been adequately assessed or communicated within the application documents (both the ES in reporting likely significant environmental impacts and in the Planning Statement in taking them into account in the planning balance).	
WLDC-19	Summary of Issue Specific 3	General and Cross-Topic	WLDCs expressed view is that, whilst any benefits for the community are welcome, the provision of community benefits packages do not constitute a relevant planning matter that should be afforded any weight in the determination of the application.	The Applicant notes this comment. For further details of previous submissions made by the Applicant on this matter, please refer to agenda item 3I of the Written Summary of the Applicant's Oral Submissions at Issue Specific Hearing 3 [REP4-070].
WLDC-20	Summary of Issue Specific 3	Need, Electricity Generated and Climate Change, Safety and Major Incidents	WLDC noted the questions from the ExA regarding the accuracy of the calculations to understand likely failure rates of the solar panels (e.g. what extent over the 40-60 years and how many days). The applicant referred to their response to ExQ1a regarding information on failure rates and stated that further information can be provided on the maintenance regime. The applicant states that	The Applicant refers to its responses made to <b>Q1.9.10 in WB8.1.21 Applicant Response to ExA First Written Questions [REP3-038]</b> .  The rate at which panels would be replaced should they cease to operate entirely is considered to be a reasonable worst case. Separately, panel performance across the Scheme would gradually

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>approximately 0.4% of the panels would be replaced per annum – across the 60 year operational period.</p> <p>The applicant also stated that, If more frequent replacement was required, this would require a formal amendment to the DCO or the demonstration that there would be no significant environmental impacts.</p> <p>WLDC maintain concerns on both the impact of the predicted 24% replacement figure and what the likelihood of exceeding this figure is. The current predicted replacement percentage could equate to around 100ha being replaced (an NSIP scale solar farm in its own right), which could occur at any stage in the project lifecycle. The applicant provides a pro-rata figure of 0.4% per annum, however clarity would be appreciated on the likely degradation rate of the panels. Logically, the older the asset becomes, the more likely it will require replacement and therefore a profile be produced to show the stages in the project lifespan where replacement is most likely to be required would be helpful. The annual 0.4% pro-rata estimate is not helpful in understanding the likely environmental impacts.</p>	<p>degrade over a number of years, but this has been accounted for within the models of the Scheme's viability and production estimates and this would not be a reason in itself for large-scale panel replacement within the lifetime of the Scheme.</p> <p>On the matter of controlling whether the Applicant replaces more panels than the 0.4% per year assessed, if the Applicant wanted to replace more than this percentage per year, they would have to demonstrate that this would not lead to any materially new or different environmental effects. If it did, the Applicant would need to apply to change the DCO. So, whilst the definition is drafted quite widely, it is constrained by the need for any maintenance works to not result in any materially new or different effects compared to those assessed in the Environmental Statement. For further details of previous submissions made by the Applicant on this matter, please refer to agenda item 5A of the Written Summary of the Applicant's Oral Submissions &amp; Responses at Issue Specific Hearing 2 [REP4-067] and agenda item 4(a) of the Written Summary of the Applicant's Oral Submissions at Issue Specific Hearing 3 [REP4-070].</p>



Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>WLDC notes the applicant's comments that, should the 24% figure be exceeded, the applicant would have to demonstrate that no significant environmental impacts would occur or the DCO would require formal amendment if such effects did arise. Whilst agreeing with this position, WLDC's concern is that there is no mechanism to allow for that consideration to take place. There is no requirement to monitor and consult with the local planning authority or other stakeholders, and this the decision on that matter resides solely with the developer. WLDC requests that the applicant considers a mechanism within the oOEMP that required maintenance reporting to WLDC and, if the 24% figure is to be breached, that information is provided to enable an independent decision to be made (by the LPA as an approving authority, an enforcing authority and a 'competent authority' for the purpose of EIA).</p>	
WLDC-21	Summary of Issue Specific 3	Need, Electricity Generated and Climate Change, Safety and Major Incidents	<p>WLDC noted the ExA question regarding the potential of roof-top solar over ground mounted, and the applicants response with regarding the policy position over.</p> <p>WLDC agree that the government's target to achieve 70GW of solar deployment does not discriminate between roof-top and ground</p>	The Applicant notes this comment.

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>mounted. Both types of solar technology is required to attain the target. An anticipated future 'roadmap' to deployment of both may be forthcoming, however the current policy position does not state a preference for one type of solar technology over the other.</p> <p>WLDC has no comments to make over solar panel manufacturing and supply chain matters.</p>	
WLDC-22	Summary of Issue Specific 3	Need, Electricity Generated and Climate Change, Safety and Major Incidents	<p>WLDC noted the applicant's comments regarding the role of the safety management plan to address battery failure and that the BESS is anticipated to be replaced once in the project lifespan.</p> <p>WLDC's concern relates to the proposed increase in the project lifespan from 40-60 years and the likelihood that the BESS will require at least a second, if not third, replacement and the extent to which this is a replacement in its entirety. Clarification on this matter is required to ensure that all environmental impacts are identified and assessed in the ES and that the management plans reflect this likelihood for replacement.</p>	<p>The document <b>WB8.2.3 Review of Likely Significant Effects at 60 Years [REP1-060]</b> was submitted at Deadline 1. Within it, Table 1.1 (in the row that refers to paragraphs 7.8.51 and 7.8.52 of the ES Climate Change Chapter) states that an additional second replacement of the batteries has been considered but concludes it is unlikely to give rise to significant greenhouse gas emissions.</p> <p>The paragraphs within Table 1 of <b>[REP1-060]</b> that refer to air quality also conclude that a change from 40 to 60 years of operation would not change the conclusion that the continued operation of the Battery Safety Management Plan would ensure a low risk of adverse effects at the closest sensitive receptors in the case of a fire.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
WLDC-23	Summary of Issue Specific 3	Landscape and Visual	<p>WLDC noted the applicant's update.</p> <p>WLDC will put forward its position in more detail at the forthcoming Issue Specific Hearing</p>	<p>The Applicant notes this comment. Matters discussed at Issue Specific 5 have been summarised and addressed in <b>WB8.1.32 Written Summary of the Applicant's Oral Submissions at the Issue Specific Hearing (ISH5) [EN010132/EX5/WB8.1.32]</b>.</p>
WLDC-24	Summary of Issue Specific 3	Soils and agriculture, Biodiversity and Ecology, Water Environment	<p>WLDC noted the applicant's comments, including that confirmation will be provided in relation to:</p> <ul style="list-style-type: none"> <li>• Panels will be cleaned using water; and</li> <li>• That all maintenance activities are considered as part of the EIA.</li> </ul>	<p>The Applicant notes this comment.</p>
WLDC-25	Summary of Issue Specific 3	Soils and Agriculture	<p>WLDC's position is that the NPPF is an 'important and relevant' matter for the purpose of decision making under section 105 of the Planning Act 2008.</p> <p>The discussion in the hearing focussed on footnote 62 (page 52) of the NPPF, which states that, the 'availability of agricultural land' used for food production should be considered when deciding what sites are appropriate for development. Whilst this policy requirement should be read alongside the NPS', it must be given due weight in that context.</p> <p>WLDC's position is that the meaning of the term 'availability' requires careful consideration and it's</p>	<p>For further details of previous submissions made by the Applicant on this matter, please refer to agenda item 6 (particularly 6(b)) of the Written Summary of the Applicant's Oral Submissions at Issue Specific Hearing 3 <b>[REP4-070]</b>.</p> <p>Grazing of the land with sheep will need to take into account the availability and quality of the forage available for grazing, just as in fields without solar PV installations. Periods with no grazing may also be desirable for biodiversity (for instance avoiding sensitive periods of flowering for nectar and pollen producing plants) and to keep sheep off wet land when the clayey topsoil is plastic and vulnerable to poaching by livestock hooves. This is appropriate grazing management, controlling both the numbers</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>practical implications must be recognised. Whilst it may be said that, for example, sheep grazing 'could' take place alongside solar farm development (as a type of 'food production'), that is different from land being genuinely being made 'available' for that activity to occur. The purpose of footnote 62 is to ensure that decision makers recognise whether land, as a consequence of the development being proposed, will be available for food production or not. If it is not being made available, then that that should be considered negatively in the planning balance for decision making purposes.</p> <p>The applicant for the West Burton Solar Project states that the land is 'available', however there is no firm commitment to making the land available for such purposes. ES chapter 19 (para. 19.9.18) states that during operation, <i>'grass below and between the solar panels will need to be managed. This management can include grazing by livestock where appropriate'</i>. Furthermore, para. 19.10.8 states that, during operation, <i>'opportunities for farm enterprises to utilise the land within the sites will be limited to periods of grazing small livestock'</i>.</p> <p>The applicant is therefore stating the there is no guarantee that the land will be used for grazing,</p>	<p>and periods of livestock grazing for the benefit of the site management, site biodiversity, fattening of lambs and the welfare of the grazed livestock.</p> <p>There is at present no guarantee of arable production on arable land, or a minimum level of intensity for production of arable crops. Many farmers in Lincolnshire with heavy and poorly drained land are responding to a succession of wet winters, high input costs (in particular nitrogen fertiliser), and increasing resistance of arable weeds to the available herbicides, by placing more land into environmental schemes such as wild bird seed or nectar and pollen plant mixes. Fields under this management produce no crops and but avoid the financial risk of a failed or loss making arable crop.</p> <p>It would not be appropriate to attempt to compel a minimum threshold of agricultural production (however that was defined) on land within a solar farm, where no such compulsion exists at present. It is also not known what useful purpose would be served by attempting to do this.</p> <p>Agricultural land within an operational solar farm remains available for grazing livestock. Grazing is a cost effective means of managing a solar farm as well</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>that there is a decision made on whether it is appropriate to do so (not explained) and, if it is utilised, that use will be limited. This impact is concluded as being a 'significant beneficial' effect despite the scope and availability of land for the production of food being significantly reduced.</p> <p>WLDC considers that the applicant's own assessment demonstrates that significant amount of 'availability' of land for food production will be lost in terms of access, area and duration. It is therefore very clear that the 'unavailability' of this land must be considered as a significant adverse impact in the planning balance</p>	<p>as providing forage for livestock. Grazing is commonplace on operating solar farms in the UK.</p> <p>Furthermore, it is noted that the ES has been prepared on the basis that land would be available for sheep grazing – the Outline Landscape and Ecological Management Plan [REP4-044] makes allowance for this, at paragraph 4.8.8. The assessment presented in Chapter 19 of the ES [APP-057] is not reliant on the ongoing use of the land for grazing to reach its conclusions on likely significant effects, rather it is a management tool during operation (to manage the growth of grass).</p>
WLDC-26	Summary of Issue Specific 3	Biodiversity Net Gain	<p>WLDC wishes to see the dDCO 'requirement' controlling the delivery of Biodiversity Net Gain (BNG) to include a figure, and welcomed confirmation from the applicant that it is to be amended to be consistent with the wording used in the drafting of the Cottam Solar Project dDCO.</p>	<p>At Deadline 4 the Applicant updated Schedule 2 Requirement 9 in the <b>WB3.1_E Draft Development Consent Order Revision E [REP4-024]</b> which requires a strategy to secure a minimum of 69.4% biodiversity net gain in habitat units, a minimum of 43.7% biodiversity net gain in hedgerow units and a minimum of 26.6% biodiversity net gain in river units. This must be submitted to and approved by the relevant planning authority.</p> <p>Please refer to the Applicant's response to Second Written Questions 2.3.2 and 2.5.12 [EN010132/EX5/WB8.1.34].</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
WLDC-27	Summary of Issue Specific 3	Drainage and Flooding and Rivers	WLDC has no comments on this matter.	The Applicant notes this comment.
WLDC-28	Actions for WLDC at Issue Specific Hearing 3	Management Plans	<p>LCC/WLDC to review Waste section of outline Landscape and Ecological Management Plan and to provide comments and suggested wording to the Applicant.</p> <p>WLDC do not recall raising a matter concerning waste in the context of the oLEMP. WLDC maintain concerns on the likely replacement of panels and the waste implications of that (please see summary of ISH3 Agenda item 4 above).</p>	The Applicant notes this comment and refers to its responses to <b>WLDC-20</b> to <b>WLDC-22</b> above.

West Lindsey District Council [REP4-084]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
WLDC-29	Draft DCO	General	The table set out below provides written summaries of the oral submissions made on behalf of West Lindsey District Council ("WLDC") at Issue Specific Hearing 2 ("ISH2") on 23 January 2024, regarding the draft Development Consent Order ("dDCO") in line with the Rule 6 letter and Deadline 1 requests of the ExA. This document also responds where relevant to any comments made by the Applicant, Lincolnshire County Council ("LCC") and/or 7000 Acres Action Group ("7000 Acres") at ISH1.	The Applicant notes this comment and has responded to each point in turn below.
WLDC-30	Draft DCO	General	WLDC welcomes the Applicant's indication that the fees provision in Schedule 17 will be updated in line with the Cottam NSIP dDCO	The Applicant notes this comment, and refers to Schedule 17 of the draft DCO [EN010132/EX5/WB3.1_F].  For further information, please refer to agenda item 6E of the <b>Written Summary of the Applicant's Oral Submissions &amp; Responses at Issue Specific Hearing 2 [REP4-067]</b> .
WLDC-31	Draft DCO	Parts 1 to 6	<p>a. Article 5 (Power to maintain the authorised development): discussion of the extent of the maintenance provisions.</p> <p>No comments</p>	a. In respect of Article 5, please refer to agenda item 5A of the <b>Written Summary of the Applicant's Oral Submissions &amp; Responses at Issue Specific Hearing 2 [REP4-067]</b> . Additionally, please refer to the Applicant's response to Second Written Question 2.5.2 [EX5/WB8.1.34].

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>b. Article 11 (Temporary prohibition or restriction of use of streets and public rights of way) and Article 14 (Agreement with street authorities): discussion to address matters raised by the local highway authority.</p> <p>No comments</p> <p>c. Article 38 (Felling or lopping of trees and removal of hedgerows): clarification of the updates to the provisions for hedgerow removal, with regard to the provisions of Advice Note 15, Section 22.</p> <p>WLDC submits that there should be a plan in relation to Article 39 in accordance with Advice Note 15, Section 22.3. As currently drafted, it is not considered in accordance with the model provision (see The Infrastructure Planning (Model Provisions) (England and Wales) Order 2009, Schedule 1, paragraph 40. This is especially important given TPOs do not appear to be referenced in the oLEMP.</p> <p>d. Article 29 (Temporary use of land for constructing the authorised development) and Article 30 (Temporary use of land for</p>	<p>b. In respect of Article 11 and Article 14, please refer to agenda item 5B of the <b>Written Summary of the Applicant's Oral Submissions &amp; Responses at Issue Specific Hearing 2 [REP4-067]</b>. Additionally, in respect of Article 11, please refer to the Applicant's response to Second Written Question 2.5.3 [EX5/WB8.1.34].</p> <p>c. In respect of Article 38, please refer to agenda item 5C of the <b>Written Summary of the Applicant's Oral Submissions &amp; Responses at Issue Specific Hearing 2 [REP4-067]</b>.</p> <p>d. In respect of Article 29 and Article 30, please refer to agenda item 5D of the <b>Written Summary of the Applicant's Oral Submissions &amp; Responses at Issue Specific Hearing 2 [REP4-067]</b>. Additionally, please refer to the Applicant's response to Second Written Question 2.5.4 [EX5/WB8.1.34].</p> <p>e. In respect of Article 49, please refer to agenda item 5E of the <b>Written Summary of the Applicant's Oral Submissions &amp; Responses at Issue Specific Hearing 2 [REP4-067]</b>. Additionally, please refer to the Applicant's response to Second Written Question 2.4.14 [EX5/WB8.1.34].</p>



Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>maintaining the authorised development); what steps been taken to alert all landowners/occupiers of land within the Order limits of this provision.</p> <p>No comments.</p> <p>e. Article 49 (Crown Rights): clarification of the nature of and progress towards gaining consent for provisions.</p> <p>No comments.</p>	
WLDC-32	Draft DCO	Schedules	<p>a. Schedule 2 – Requirement 5. Detailed design approval: discussion of why detailed design approval is confirmed to Work Nos 1,2 and 3.</p> <p>WLDC would welcome clarification from the applicant why requirement 5 only relates to the works specified.</p> <p>b. Schedule 2 Requirement 9 Biodiversity Net Gain: consideration of the mechanisms by which the anticipated levels of BNG would be secured through the dDCO.</p> <p>WLDC considers that there should be a minimum percentage of BNG secured through the dDCO which can be considered in the planning balance. It is</p>	<p>a. In respect of Schedule 2, requirement 5, please refer to agenda item 6A of the <b>Written Summary of the Applicant's Oral Submissions &amp; Responses at Issue Specific Hearing 2 [REP4-067]</b>. Additionally, please refer to the Applicant's response to Second Written Question 2.5.9 [EX5/WB8.1.34].</p> <p>b. In respect of Schedule 2, requirement 9, please refer to agenda item 6B of the <b>Written Summary of the Applicant's Oral Submissions &amp; Responses at Issue Specific Hearing 2 [REP4-067]</b>. Additionally, please refer to the Applicant's response to Second Written Questions 2.3.2 and 2.5.12 [EX5/WB8.1.34].</p> <p>c. In respect of Schedule 9, please refer to agenda item 6C of the <b>Written Summary of the Applicant's Oral Submissions &amp; Responses at Issue Specific</b></p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>noted that the Applicant is committed to delivering the enhancement measures in the oLEMP, however that does not provide sufficient clarity as to the minimum percentage. There are appropriate mechanisms and drafting options to address any change in biodiversity metric (see for instance the Longfield DCO Correction Order). Nevertheless, it is recognised this is a decision for the Applicant.</p> <p>c. Schedule 9 Deemed Marine Licence under the 2009 Act: update on discussions with the MMO.</p> <p>No comments.</p> <p>d. Schedule 16 Protective Provisions. The Applicant will be asked to provide an update progress between the parties, with an explanation of any important differences in view and timescales for resolution. In particular consideration will be given to provisions for: a. Network Rail b. EDF c. Marine Management Organisation d. Canal and River Trust e. The Environment Agency f. Other parties</p>	<p><b>Hearing 2 [REP4-067]</b>. Additionally, please refer to the Applicant's response to Second Written Question 2.4.11 [EX5/WB8.1.34], and response MMO-01.</p> <p>d. In respect of Schedule 16, please refer to agenda item 6D of the <b>Written Summary of the Applicant's Oral Submissions &amp; Responses at Issue Specific Hearing 2 [REP4-067]</b>. Additionally, please refer to the <b>Schedule of Progress regarding Protective Provisions and Statutory Undertakers [REP4-065]</b> which sets out the latest position on negotiations with each of the parties listed.</p> <p>e. In respect of Schedule 17, please refer to agenda item 6E of the <b>Written Summary of the Applicant's Oral Submissions &amp; Responses at Issue Specific Hearing 2 [REP4-067]</b> and Schedule 17 in the draft DCO [EX5/WB3.1_F].</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>with which protective provisions have not yet been agreed.</p> <p>No comments.</p> <p>e. Schedule 17 Procedure for discharge of Requirements: noting that these are bespoke provisions, the positions of the planning authorities and other consenting bodies will be clarified.</p> <p>Deemed consent - WLDC objects to the inclusion of a deemed consent provision. Due to the scale and potential complexity of the details and their importance to ensure that mitigation for a large scale infrastructure project is assessed and implemented, it is wholly unacceptable to impose a deemed consent provision. Additionally, with the potential cumulative impact of having to process subsequent approvals for several similar projects, it is essential that WLDC has sufficient time to make well informed decisions in the public interest.</p> <p>Approval timescales - The deemed consent provision also has an impact on WLDC's position with regard to the</p>	

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>approval timescales discussed below. Should the deemed consent provision be retained, WLDC consider that a longer determination period is proportionate. The timescales WLDC considers to be acceptable are influenced by whether a deemed consent provision is included in the DCO. If it is retained, a longer period of time is required to enable WLDC to fulfil its duties in the determination of subsequent applications that relate to EIA development.</p> <p>Consistent with the reasons that WLDC object to the deemed consent provision, it is essential that WLDC has reasonable time to interpret, assess, have regard to consultee representations, negotiate and formally determine complex and technical details that are required in order for the project to be acceptable.</p> <p>WLDC's position on the timescale are therefore: Should there be no deemed consent provision, WLDC request that the following timescales be specified:</p> <p>Requirement 5 = 13 weeks</p>	

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>Other Requirements = 10 weeks</p> <p>Should a deemed consent provision be retained, WLDC request that the following timescales be specified:</p> <p>Requirement 5 = 16 weeks</p> <p>Other Requirements 13 weeks</p> <p>The above timescales allow a reasonable and proportionate timescale in order to assess and determined typically complex and 'new' information relating to a large scale EIA development.</p> <p>WLDC welcomes the inclusion of an extension of time provision (Schedule 17.2(2)(c)). WLDC requests that the drafting is amended so that it is a clearer and more precise provision. In its current form the provision is unclear when read in conjunction solely with Schedule 17.2(2). WLDC also requests that the provision includes a clause that agreement to an extension of time cannot be unreasonably withheld.</p> <p>Fees - WLDC's position aligns with LCC's in respect of the proposed fee provision and</p>	

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			WLDC welcomes the Applicant's intention to update the fee provision in line with the Cottam NSIP dDCO.	
WLDC-33	Draft DCO	Phasing	<p>WLDC requests that the Applicant considers including a phasing requirement in Schedule 2. It is acknowledged that the oCEMP includes detail on when anticipated works will start and relates to an indicative construction programme, however, WLDC considers that it would be of benefit to include a phasing requirement that provides greater clarity and certainty, including so that WLDC, as the relevant discharging authority for many requirements, is able to anticipate when discharge applications are likely to be submitted. It is submitted that the drafting used in the Mallard Pass dDCO should be adopted as follows (although it is recognised that the reference to 'date of final commissioning' may need to be revised in light of the definition of the same in the current dDCO):</p> <p><i>3.—(1) No part of the authorised development may commence until a written scheme setting out the phase or phases of construction of the authorised development has been submitted to and approved by the relevant planning authorities.</i></p>	In response to WLDC's comments at Issue Specific Hearing 2, Requirement 2 in Schedule 2 to the draft DCO [EX5/WB3.1_F] has been updated to include the requirement that no part of the authorised development may commence until a written scheme setting out the phase or phases of construction of the authorised development has been submitted to the relevant planning authorities.

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p><i>(2) The scheme submitted pursuant to sub-paragraph (1) must include a timetable for the construction of the phase or phases of the authorised development and a plan identifying the phasing areas.</i></p> <p><i>(3) The scheme submitted and approved pursuant to sub paragraph (1) must be implemented as approved.</i></p> <p><i>(4) Notice of the date of final commissioning with respect to each phase of Work No. 1 to complete commissioning must be given to the relevant planning authorities within 15 working days of the date of final commissioning for that phase.</i></p>	
WLDC-34	Draft DCO	Maintenance	<p>WLDC submits that the following Schedule 2 requirements should include retention and/or maintenance clauses: requirement 6 (Battery Safety Management), requirement 8 (Ecological protection and mitigation strategy), requirement 9 (Biodiversity net gain), requirement 16 (Operational noise) and requirement 20 (Skills, supply chain and employment). WLDC understands the Applicant's position that the control docs will require retention and/or maintenance but considers it would be clearer and more precise if they were also secured in the dDCO itself. There is significant precedent to this effect, including the Longfield DCO (requirement</p>	<p>Please refer to the Applicant's response to Second Written Question 2.5.8 [EX5/WB8.1.34].</p> <p>For further details, please refer to agenda item 7 of the <b>Written Summary of the Applicant's Oral Submissions &amp; Responses at Issue Specific Hearing 2 [REP4-067]</b>.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			11); Gate Burton dDCO (requirements 6, 7, 8, 10, 15 and 18); Mallard Pass dDCO (requirements 8, 9, 12 and 16); Little Crow DCO (requirements 8 and 15); and the Sunnica dDCO (requirements 7, 8, 11, 12, 17, 19, 20 and 21)	
WLDC-35	Draft DCO	Decommissioning	WLDC considers that Schedule 2, requirement 21 should require decommissioning no later than 40 years following the date of final commissioning, not 60 years as currently drafted for the reasons raised by WLDC at <i>[incomplete sentence]</i>	Please refer to the Applicant's response to Second Written Question 2.1,4 [EX5/WB8.1.34].



## 2.2 Submissions by 7000 Acres

7000 Acres [REP4-085; REP4-086; REP4-087; REP4-088]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
7A-01	Cumulative Development	Cumulative Development	<p>Please see the attached map showing 9 solar NSIPs, with 5 falling within a 10km radius!</p> <p>The 7000 acres group was initially named after the first 3 solar applications in the area, covering some 7000 acres of farmland. Its name, now being out of date with an unprecedented amount of solar proposals in this single 10km zone. This area has now almost doubled to around 13,000 acres, with new schemes seemingly being announced every few months. As a voice for the rural communities affected, we urge that any decisions made regarding so much farmland being given over to this inferior and inefficient electricity generator, are based on the full facts of net zero, food security, climate change and affordable electricity. We believe solar on farmland would hinder all of these ambitions.</p> <p>This map is shocking evidence of an opportunistic and out of control industry. The brakes must be applied. Solar in the UK, on this scale and in this form is damaging and does not have a compelling case.</p>	<p>The Applicant notes this comment and seeks to assure 7000 Acres that a cumulative effects assessment is available <b>6.2.1-6.2.23 Environmental Statement [APP-039 to APP-060 and REP3-010]</b>. Cumulative effects assessments for each topic are set out in each of the ES Chapters and include the assessment of the impacts of the Scheme cumulatively with the NSIPs.</p> <p>The assessment has been undertaken in accordance with Schedule 4 of the 2017 EIA Regulations and PINS Advice Note 17. The mitigation measures set out across the ES therefore accounts for anticipated cumulative effects, as summarised in ES Chapter 22: Mitigation Schedule <b>[APP-060]</b> and ES Chapter 23: Summary of Significant Effects <b>[REP3-010]</b>.</p> <p>Regarding emerging schemes <b>ES Addendum 23.1: Cumulative Effects [EN010132/EX5/WB8.4.23.1]</b> is submitted at Deadline 5 which compiles all updates on the assessment of cumulative impacts since the submission of the DCO application. There is also an update to the <b>Technical Note on Cumulative Effects [EN010132/ EX5/WB8.2.5_A]</b> which addresses One Earth Solar Farm, Great North Road Solar Park,</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>The schemes shown include;</p> <ol style="list-style-type: none"> <li>1.COTTAM SOLAR PROJECT</li> <li>2.WEST BURTON SOLAR PROJECT</li> <li>3.GATE BURTON ENERGY PARK</li> <li>4.TILLBRIDGE SOLAR</li> <li>5.STEEPLE RENEWABLES</li> <li>6.VOLTIS SOLAR (scoping)</li> <li>7.ONE EARTH SOLAR</li> <li>8.FOSSE GREEN</li> <li>9.GREAT NORTH ROAD SOLAR</li> </ol> <p>1-5 fall inside the 10km Gainsborough solar complex.</p> <p>6&amp;7 fall just outside the 10km zone.</p> <p>8&amp;9 are also shown on this map and this is by no means the full picture, with at least 4 more solar NSIPs, South of Lincoln; SPRINGWELL, HECKINGTON FEN, BEACON FEN and MALLARD PASS</p>	<p>Fosse Green Energy, Springwell Solar Farm and Beacon Fen Energy Park and Stow Park Solar Farm.</p> <p>The Steeple Renewables Project is located to the south of West Burton Power Station around Sturton Le Steeple. The cable corridor for the Scheme will be located within land proposed for the Steeple Renewables Project. Currently this scheme has undertaken non-statutory consultation during October-December 2023. There has been no EIA scoping submitted for the Steeple Renewables Project. Therefore, in accordance with the approach to cumulative assessment set out in <b>Chapter 2 EIA Process and Methodology [APP-040]</b> and <b>Technical Note on Cumulative Effects of Additional Schemes [REP4-073]</b>, this project doesn't fall into any of the three tiers and therefore, the project has not been considered. However, the Applicant is in discussions with the developer of the Steeple Renewables Projects to ensure that it can co-exist with the Scheme.</p> <p>As far as the Applicant is aware, a Scoping Report for Voltis Solar has not been published. Therefore, the Applicant cannot consider the potential cumulative effects of this scheme, as no published information relating to it which can be used to base such an assessment. This approach accords with the</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				<p>approach to cumulative effects assessments set out in the Planning Inspectorate's Advice Note 17: Cumulative effects assessment relevant to nationally significant infrastructure projects (August 2019 – version 2).</p> <p>The Applicant has addressed net zero, food security, climate change and affordable electricity in its response to question 1.1.11 of <b>WB8.1.21 Applicant Response to ExA First Written Questions [REP3-038]</b>, responses to comments CLI01-CLI02, and SOI-02 in <b>WB8.1.19 Response to Written Representations at Deadline 1 Part 3 [REP3-036]</b> and <b>WB7.5_B Planning Statement Revision B [REP4-048]</b>.</p>
7A-02	Cumulative Impacts	Joint Interrelationship Report	7000 Acres wishes to state that the Applicant's Report is incomplete and does not show the entirety of the schemes in the local area, and so cannot be a true assessment of the cumulative impact on this rural area. 7000Acres will submit a map showing the true extent of the solar schemes in this area	<p>The Applicant notes this comment and refers to their response to comment 7A-01 in this document above. The <b>Joint Report on Interrelationships between Nationally Significant Infrastructure Projects [REP4-059]</b> provides information on the interrelationships between the Gate Burton Energy Park, Cottam Solar Project, West Burton Solar Project and Tillbridge Solar Project. The assessments carried out have been prepared by competent experts and has been prepared to support the Development Consent Order (DCO) applications for the four projects.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
7A-03	Cumulative Impacts	Joint Interrelationship Report	We share the concerns shown made by WLDC, that: <i>'that the cumulative change to the landscape will be considerable and significant, and the combination of two or more sites has the potential to change the local landscape character at a scale that would be of more than local significance. The cumulative impact of the four adjacent NSIP scale solar schemes has the potential to affect the landscape at a regional scale through predominantly a change in land use: from arable to solar, creating what may be perceived as an 'energy landscape' as opposed to rural or agricultural one at present.'</i>	The Applicant notes this comment.  Please refer to the Applicant's response to reference WLDC-61 in <b>WB8.1.17 Response to Written Representations at Deadline 1 Part 1 [REP3-034]</b> .
7A-04	Cumulative Impacts	Joint Interrelationship Report	The Applicant's use of "professional judgement", without supporting evidence, results in a conflicting view from those expressed by the Councils' experts and some of those expressed by the specialist employed by the Gate Burton solar NSIP. The Applicant has stated that the proposed development will have a negligible or beneficial cumulative impact on the landscape. However, within the Applicant's own documentation they argue the opposite. Paragraph 18.7.112 of the Socio-economic chapters (Doc. Ref. EN010133/APP/C6.2.18) states that the Scheme will 'have a long-term	The Applicant respectfully disagrees with the opinion that the difference in assessment outcomes between projects, and between ES subject topics for this Scheme undermines any of the assessment outcomes in this DCO Application. Furthermore, the Applicant notes that the party is making reference to a document for a different solar NSIP: Cottam Solar Project <b>[EN010133]</b> .  In <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b> , the assessment of impact on local tourism and recreation receptors that are reliant on the landscape context for their value relies on the assessment of

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>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 statement from the Applicant undermines their LVIA findings and conversely the LVIA findings undermine the Socio-economic statements as cited.</p>	<p>impacts to landscape character, and visual impacts to specific receptors in <b>6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b>, and applies professional judgement to conclude a reasonable worst-case scenario impact on these receptors in terms of their desirability and value as tourism attractions. Section 18.7 [APP-056] is reliant on likely pre-mitigation impacts to determine whether or not there are likely significant effects that require additional mitigation.</p> <p>For construction, para. 18.7.57 [APP-056] notes a peak moderate adverse impact on local landscape-based tourism attractions. This is based on the adverse impacts identified to landscape character during construction (as identified in Tables 8.50-8.56 [APP-046]) and on significant adverse impacts identified to visual receptors (as identified in Tables 8.57-8.66 [APP-046]).</p> <p>For operation, para. 18.7.104 [APP-056] identifies a peak moderate-minor adverse effect on the tourism value of landscape-based tourism attractions. This is based on the adverse impacts identified to landscape character during operation from Year 1 to Year 15 (as identified in Tables 8.50-8.56 [APP-046]) and on significant adverse impacts identified to visual</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				<p>receptors from Year 1 to Year 15 (as identified in Tables 8.57-8.66 [APP-046]). Consideration of the likely reduction in impact and onset of beneficial effects over time as mitigation planning matures has been considered and is why the likely level of significance during operation is less than that during construction.</p> <p>Where likely effects on tourism and recreation receptors during operation are summarised at paragraph 18.7.116 [APP-056], this is based on pre-mitigation effects. The effects of mitigation during the operation of the Scheme are set out in paragraphs 18.8.16 which identifies that while impacts on tourism and recreation receptors are likely to reduce, the level of significance of impact is assessed to remain the same. This however is an assessment of the tourism value of these receptors, some of which are landscape-sensitive or landscape-dependent, but is distinct from the assessment of landscape and visual impact as assessed in the LVIA [APP-046].</p> <p>When considering cumulative impacts, the LVIA [APP-046] has identified no further significant impacts on landscape character or visual impacts. This has been reflected in para. 18.10.29 and 18.10.52 [APP-056] which conclude local landscape, heritage, and recreational attractions are not likely to increase the</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				<p>level of significance of effect to their value to tourism and recreation as a result of cumulative effects.</p> <p>These conclusions are reflected in <b>6.2.23_B ES Chapter 23 Summary of Significant Effects Revision B [REP3-010]</b> and <b>WB8.1.9_C Joint Report on Interrelationships between Nationally Significant Infrastructure Projects - Revision C [REP4-059]</b>.</p>
7A-04A	Cumulative Impacts	Joint Interrelationship Report	In the opinion of 7000Acres, this document does not provide a true and accurate assessment of the monumental cumulative impact the numerous solar NSIP schemes will have on the region.	The Applicant notes this comment and refers to its response to comment 7A-01 in this document above.
7A-05	Socio-Economics and Human Health	Health and Wellbeing	These comments have been prepared by a health professional. Please refer to the earlier 7000Acres submissions and comments made at Open Floor Hearings on this matter.	The Applicant notes this comment and refers to the responses made to comments made at both Open Floor Hearing 1 <b>8.1.5 Written Summary of the Applicant's Oral Submissions at the Open Floor Hearing [REP1-051]</b> .
7A-06	Socio-Economics and Human Health	Health and Wellbeing	In response to the Applicant's various submissions, we now understand, following the open floor hearing that the documents Environmental Statement: Chapter 18: Socio-Economics and Tourism and Recreation 3/23 and Environmental Statement: Chapter 21: Other Environmental Matters 3/23, were compiled by a	As discussed during Issue Specific Hearing 4 <b>[REP4-071]</b> , there is no requirement for matters relating to population and human health in an Environmental Impact Assessment to be authored by a health or medical professional. This also is the case for Health Impact Assessments.

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			Town Planner and not a Health Professional with a background in Population Health Management. This was highlighted in the session on human health and wellbeing and a request for a specific hearing on health was put to the examiners. The applicant's lawyer discussed IRMA as a guideline for producing this document. This guidance is used in big mining projects. 7000acres has outlined concerns as to the methodology used as much of the author's thinking relates to urban areas and not rural.	<p>The professional ability, background, and level of experience of the chapter authors and supporting team at Lanpro is set out in <b>6.3.1.1 Environmental Statement - Appendix 1.1 Statement of Competence [APP-062]</b>.</p> <p>The Applicant also clarifies that reference was made to IEMA (Institute of Environmental Management and Assessment) which is the international accrediting professional body for Environmental Impact Assessment.</p>
7A-07	Socio-Economics and Human Health	Health and Wellbeing	We are aware that LANPRO is preparing an addendum on Health and Wellbeing, similar to the one produced for Cottam. Most of the health and wellbeing assessments were buried in the above two Environmental statements. We also note that Public Health Lincolnshire are preparing a document for the Lincolnshire County Council on the human affects of the schemes on health and therefore we would welcome their report.	<p>The Applicant confirms that <b>WB8.4.21.1 Environmental Statement - ES Addendum 21.1: Human Health and Wellbeing Effects [REP4-077]</b> has been submitted to the examination to collate the human health and wellbeing impacts assessed in the ES, provide additional signposting to assessment outcomes with regard to human health and wellbeing impacts as assessed in each of the relevant ES topic chapters, and a summary of the key comments on human health and wellbeing that have been discussed during Examination.</p> <p>Furthermore, the Applicant also understands that as of Deadline 5, the public health report referenced has not yet been published.</p>



Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
7A-08	Socio-Economics and Human Health	Health and Wellbeing	7000 acres has always advocated a Health Impact Assessment, preferably one single assessment over all the schemes. This would involve the local statutory bodies who hold local intelligence and are able to deep dive the data and make good sense as to whether or not these schemes would affect human health and wellbeing in the areas affected by them. Rural issues are very different to those of urban. A report by 7000 acres has been submitted to the Cottam examiners on the addendum to human health and wellbeing. We suspect, that the West Burton addendum will be very similar as this will be submitted by the same author from LANRO.	The Applicant notes this comment and refers to matters discussed on the topic of human health and wellbeing as summarised and addressed at Agenda item 5 in <b>WB8.1.28 Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 4 and Responses to Action Points [REP4-071]</b> and its response to comment 7A-115 in . <b>WB8.1.18 Response to Written Representations at Deadline 1 Part 2 [REP3-035]</b> .
7A-09	Socio-Economics and Human Health	Health and Wellbeing	7000 acres has requested a specific hearing on human health and wellbeing with the intention of having health professionals at the hearing. Within the applicant's assessment, there are numerous statements on significant health such as mental health, which have been considered non-significant. Having an author who has referenced very few health documents, and who is a Town Planner cannot be an expert in Health. Therefore, we do not recognise many of the opinions made within this document. 7000 Acres has submitted WR's on both Human Health and	The Applicant notes this comment The Applicant notes this comment and refers to its response to comment 7A-06 in this document above.  The Applicant has responded to all comments in 7000 Acres's written representations in <b>WB8.1.18 Response to Written Representations at Deadline 1 Part 2 [REP3-035]</b> .

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			Wellbeing as well as noise (please refer again to these comprehensive reports).	
7A-10	Socio-Economics and Human Health	Health and Wellbeing	Ref 7A-114 7000 acres finds it very difficult to accept the applicant's opinion as to their assessment of direct human health impacts from the scheme in the ES, A desktop review does not highlight local issues and therefore local intelligence is needed by the local experts who have not been consulted.	The Applicant notes this comment and refers to matters discussed on the topic of human health and wellbeing as summarised and addressed at Agenda item 5 in <b>WB8.1.28 Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 4 and Responses to Action Points [REP4-071]. 6.2.21 Environmental Statement - Chapter 21 Other Environmental Matters [APP-059]</b> also notes the consultation the Applicant carried out, which informed the assessment of human health impacts.
7A-11	Socio-Economics and Human Health	Health and Wellbeing	Ref 7A-115 We do not agree with this statement. As each scheme is separate this has not triggered a Health Impact Assessment. However, given the number of schemes and the dense population living within these schemes, mostly rural, some urban, the cumulative impact is such that a Health Impact Assessment should be carried out with involvement of the local health statutory bodies. This is a Governance issue and therefore there is a responsibility by the applicants of all the schemes to ensure human health and wellbeing is adequately weight as part of the planning process. The applicants legal	The Applicant notes this comment and refers to its response to comment 7A-115 in <b>WB8.1.18 Response to Written Representations at Deadline 1 Part 2 [REP3-035]</b> .  The Applicant has undertaken an assessment of the cumulative impacts on health and wellbeing throughout each of the relevant topics within the ES, the summary of which is set out in para. 21.5.37-21.5.43 in <b>6.2.21 Environmental Statement - Chapter 21 Other Environmental Matters [APP-059]</b> and section 3.16 of <b>ES Addendum 23.1: Cumulative Effects [EX5/WB8.4.23.1]</b> . The outcomes

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			team keep referring to the ES as having completed a Health Impact Assessment. That is not the case.	are set out at a greater level of detail, topic-by-topic, in Section 3.5 of <b>WB8.4.21.1 Environmental Statement - ES Addendum 21.1: Human Health and Wellbeing Effects [REP4-077]</b> . The Applicant's position is that the assessment undertaken for the Scheme alone and cumulatively is comparable to the scope of a joint Health Impact Assessment. As such, the assessment in the ES <b>[APP-059, REP4-077, and EX5/WB8.4.23.1]</b> provides sufficient information for the level of assessment required for a project of this scale, and thus gives a suitable level of information for decision-making.
7A-12	Socio-Economics and Human Health	Health and Wellbeing	Ref 7A-116 We have replied to this in full within the Cottam addendum on Human Health and Wellbeing. There are failures in understanding the local intelligence around access to primary care, and understanding of population health management. This includes identifying health inequalities which is a specialist area, issues around deprivation especially when the applicant has not specifically given details to employing people from low deprived areas (paying lip service to the examiners). With regards to the 2 papers which the applicant finds academically interesting, why is it that Lincolnshire farms around Gainsborough are to	<p>Access to primary healthcare and population health is addressed in <b>6.2.21 Environmental Statement - Chapter 21 Other Environmental Matters [APP-059]</b>.</p> <p>The Applicant refers to its response to comment 7A-06 above in this document and to matters discussed on the topic of human health and wellbeing as summarised and addressed at Agenda item 5 in <b>WB8.1.28 Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 4 and Responses to Action Points [REP4-071]</b>.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			be used when the two power stations are across in Nottinghamshire? Also, West Burton 4 was dropped and maybe their backlash was too much to handle whereas Gainsborough and surrounding areas with significant deprivation remained!	The Applicant has submitted <b>6.3.5.1_A Environmental Statement - Appendix 5.1 Site Selection Assessment Revision A [AS-004]</b> . This details the reasons for the selection of the Order Limits and the reasoning for the removal of the West Burton 4 site prior to the DCO application being made.
7A-13	Socio-Economics and Human Health	Health and Wellbeing	Ref 7A-118 a desktop review by a Town Planner is not satisfactory. This needs input using local intelligence by health professionals who understand population health management, health outcomes and particularly health inequalities. 7000 acres has always advocated an independent qualitative survey to gauge the populations feeling on how this and other schemes would impact on their health. Perhaps set up by MORI who would ask the right questions in a way that was not biased, but also ensure that the population is well informed before such a survey is sent out. The 2 preliminary questionnaires sent out by IGP did not ask anything on health impact.	The Applicant refers to its response to comment 7A-06 above in this document and the matters discussed on the topic of human health and wellbeing as summarised and addressed at Agenda item 5 in <b>WB8.1.28 Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 4 and Responses to Action Points [REP4-071]</b> .  A specific survey questionnaire on human health was not considered necessary by the Applicant, nor was it requested by host authorities or local healthcare bodies during consultation for EIA Scoping or at Section 42 statutory consultation.
7A-14	Socio-Economics	Health and Wellbeing	Ref 7A-120 We are glad that the applicant recognises the significance of the countryside for physical and mental wellbeing, However, their view of positive health impacts being	The Applicant notes this comment.

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
	and Human Health		recreational facilities and public rights of way in no way reflects the issues rural people face when it comes to health and wellbeing, especially when rural way of life is affected by such schemes. We will expand on this when we receive the addendum.	
7A-15	Socio-Economics and Human Health	Health and Wellbeing	Ref7A-120 Motion detectors are not wind proof. In an area with relatively little light pollution, this a problem. We do not live next door to industrialised areas, which the scheme proposes. This is an intrusion, and light pollution could affect sleep at night, which is a health hazard.	<p>The Applicant refers back to the comments made at 7A-120 in <b>WB8.1.18 Response to Written Representations at Deadline 1 Part 2 [REP3-035]</b>.</p> <p>The Applicant is confident that the measures for construction lighting, and operational lighting are sufficient to ensure adverse impacts on residential amenity, including sleep as a health concern, are mitigated against.</p> <p>These measures are set out in Section 2.6 and Table 3.5 of <b>WB7.1_C Outline Construction Environmental Management Plan [REP4-042]</b>, and Section 2.5 and Table 3.5, <b>WB7.14_C Outline Operational Environmental Management Plan - Revision C [REP4-054]</b>. These are secured by Requirements 13 and 14 respectively of Schedule 2 of <b>WB3.1_F Draft Development Consent Order Revision F [EN010132/EX5/WB3.1_F]</b>.</p>
7A-16	Socio-Economics	Health and Wellbeing	Ref 7A-121 What has the Trent Valley Way got to do with overall health implications as a	Both the Trent Valley Way and National Byways are long-distance recreational routes likely to be

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
	and Human Health		significant adverse effect. This is why we need a Health Impact Assessment using local intelligence! As this has not been prepared by a health professional with the necessary background, we cannot accept the impact statements within this report. The qualitative data referred to in the report is 2011 census data(Figure 18.4: Self-Assessment of Health in the Population) is completely out of date and therefore we urge the examiners to request an independent qualitative survey on the subject as outlined above and in the 7000 acres WR report on Human Health and Wellbeing.	<p>significantly adversely affected by the construction of the Scheme. This has been deemed to have a significant effect on human health and wellbeing due to the impact on both physical and mental wellbeing of a wide-reaching section of the population who have access to these recreational routes.</p> <p>The Applicant refers to its response to comment 7A-06 above in this document.</p> <p><b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b> paragraph 18.4.2 outlined the information sources used for the assessments. Figure 18.4 in <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b> relies on Census data from 2021, not 2011. At the time of writing the assessment, the 2021 data was the most recent data available for self-assessment of health.</p>
7A-17	Socio-Economics and Human Health	Health and Wellbeing	Ref7A-112 Health inequalities is a specialist subject. A HEAT (Health Equity Assessment Tool) tool has not been done and the NHS needs to assess that these schemes do not affect the Core20Plus5 programme. Random statements that will benefit employment has all the right words but very little substance that	<p>The Applicant refers to the comments made at 7A-113 in <b>WB8.1.18 Response to Written Representations at Deadline 1 Part 2 [REP3-035]</b>.</p> <p>HEAT is a tool for aiding understanding of the requirements of the Equality Act 2010, and is primarily aimed at public health and related service providers, not for assessment of impacts from</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			demonstrates the beneficial impact to those in deprived areas.	<p>individual development. This instead is performed by the <b>7.12 Equality Impact Assessment [APP-321]</b>.</p> <p>The NHS Core20Plus5 programme is to inform action to reduce healthcare inequalities at both national and system level. The assessment of the Scheme in the relevant parts of the ES <b>[APP-059, REP4-077, and EX5/WB8.4.23.1]</b> identify no long-term significant health impacts from, nor any health impacts that will disproportionately effect population groups with existing or potential health inequalities. The Applicant furthermore refers to representations made by NHS Lincolnshire Care Commissioning Group and Integrated Care Boards that state they did not have any comments nor additional assessment requirements for the Scheme when consulted for EIA Scoping (see pg. 143 of <b>6.3.2.2 Environmental Statement - Appendix 2.2 EIA Scoping Opinion [APP-068]</b>) or at Section 42 Statutory Consultation (see pg. 450 and 453 of <b>5.13 Consultation Report - Appendix 5.13 - Section 42 Applicant Response [APP-037]</b>).</p>
7A-18	Socio-Economics and Human Health	Health and Wellbeing	Ref 7A-123 If the applicant is cognisant of the significance of the countryside for physical and mental wellbeing, why does the author not state that it is the open greenspace (countryside) that helps with mental health as well as wellbeing.	Access to, and the desirability of the access to the countryside by means of public rights of way and the recreational use of the local highway network has been considered as a determinant of mental health and wellbeing. As such, these have been suitably

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>Why do so many people in towns flock to the countryside for holidays? Our Airbnb's are not empty which shows people come here to enjoy what the countryside offers including lifting people's mental health. We ask how the applicant is going to mitigate against this to improve positive health outcomes?</p>	<p>assessed in the ES in <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b> and <b>6.2.21 Environmental Statement - Chapter 21 Other Environmental Matters [APP-059]</b>.</p> <p>Landscape and visual impacts on residential amenity have not been separately considered as health and wellbeing, as they have been assessed in <b>6.2.8 ES Chapter 8 Landscape and Visual Impact [APP-046]</b>. This is set out in paragraphs 4.3.8-4.3.11 in <b>WB8.4.21.1 Environmental Statement - ES Addendum 21.1: Human Health and Wellbeing Effects [REP4-077]</b>.</p> <p>Mitigation measures to reduce adverse impacts on the landscape and visual environment, and on the use and access to public rights of way, are set out in <b>WB7.3_D Outline Landscape and Ecological Management Plan - Revision D [REP4-044]</b> and <b>WB6.3.14.3_D ES Appendix 14.3 Outline Public Rights of Way Management Plan Revision D [REP4-040]</b>. The documents are secured by Requirements 7 and 18 respectively of Schedule 2 of <b>WB3.1_F Draft Development Consent Order Revision F [EN010132/EX5/WB3.1_F]</b>.</p>



Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
7A-19	Socio-Economics and Human Health	Health and Wellbeing	<ol style="list-style-type: none"> <li>1. Ref 7A-124 We do not accept this opinion from a Town Planner. Age is a protected characteristic which has not adequately been addressed in the Equality Impact Assessment.</li> <li>2. Ref 7A-126 We have covered this in Ref7A-115.</li> <li>3. Ref7A-127 We note the applicant's comment. Given we now know the author is a Town Planner, this becomes more imperative with the right health professionals in the room to advise the examiners.</li> </ol>	<ol style="list-style-type: none"> <li>1. The purpose of <b>WB7.12 Equality Impact Assessment [APP-321]</b> is to identify where effects from the Scheme would have a disproportionate or differential effect on groups of people on the grounds of their protected characteristics as defined by the Equality Act 2010. The <b>WB7.12 Equality Impact Assessment [APP-321]</b> concludes that the Scheme will not result in differentiated or disproportionate effects on groups with the protected characteristics, including age.</li> <li>2. See response to 7A-11 above in this document.</li> <li>3. The Applicant notes this comment and refers to its response to comment 7A-06 in this document above..</li> </ol>
7A-20	Noise	Noise	<p>Ref7A-152 We do not think the applicant has answered our WR on noise. Our submission was referenced around the operator cycle. Again, we believe people's perception of sound is subjective. The methodology they use is mainly effective in urban areas where background noise dampens down the effect. In quiet rural settings, this is not the case. Extraneous noise is therefore more subjectively heard. No machines to monitor can capture this. We note that the baseline limits are the same for urban as with</p>	<p>The Applicant refers to its response to 7A-152 in <b>WB8.1.18 Response to Written Representations at Deadline 1 Part 2 [REP3-035]</b>, which confirms the methodology used in the <b>Noise and Vibration Environmental Statement (ES) chapter [APP-053]</b> is in accordance with the legislative and policy requirements and current British Standards.</p> <p>The Applicant re-iterates that Chapter 15: Noise and Vibration of the Environmental Statement <b>[APP-053]</b> concludes that, with the implementation of</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>rural. They are not the same. There is a lot of guidance on SOAEL, LOAEL, NAOEL and NOEL. Rural areas have very little industrial and commercial sound. If so, it happens intermittently at peak traffic times or in the agricultural sector, which is seasonal. Away from main roads living in the depths of the countryside, there is very little exposure to extraneous sound. At night there is very little background noise. The guidance has been set, however, it will be very difficult to work out the operational noise before such schemes are built. At best it is a guess. In Winter, people's windows and doors are shut. In Summer, they remain open during the day and for longer periods in the evening. Therefore, in Summer, when the transformers and invertors are at maximum capacity, the sound generated will affect those is close proximity to the units. How will IGP mitigate against this? No tests can predict what people might experience as a result! Even worse, the noise level is predicted to vary throughout the day when different loads from demand are placed from the National Grid. Powering up and down will produce significant noise. How can one predict this will be gradual? The examiners need to ensure that people who live in close</p>	<p>mitigation, no likely significant adverse effects are anticipated resulting from noise during the construction, operation and maintenance, and decommissioning of the Scheme. All assessments have been undertaken with plant operating at 100% capacity and therefore representing the worst-case scenario. In reality, noise levels as a result of the Scheme will generally be lower than those predicted..</p> <p>Due to the lack of legislative guidance on hyperacusis, further commentary on this matter cannot be included.</p>

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			<p>proximity will not experience this noise such that it will affect their health! Therefore, we do not agree with the comment, no significant residual effects are predicted during the operational phase. We did highlight hyperacusis. A recent BBC report has highlighted this problem. Partially sighted people rely on their hearing which tends to be raised in this group. How does IGP intend to mitigate against this group of people?</p>	
7A-21	Noise and Vibration	Noise and Vibration	<p>This short video clip is from a visit to a 50MW BESS. The true dB rating is not known but the sound is clearly unreasonable for a quiet rural village setting.</p> <p>High noise levels are during charging and discharging, when maximum cooling is required, this is an unacceptable noise issue for local residents.</p> <p>This level of nuisance needs to be fully understood before many times this is deployed here.</p>	<p>The Applicant acknowledges the comment from 7000 Acres.</p> <p>The predicted noise levels for the BESS have been based on manufacturers' noise data and have been assessed based on industry standard prediction methods and in accordance with guidelines contained within the current British Standards. Plant of this nature is not silent and up close, as in the video clip, it can be considered the dominant noise source. The Applicant re-iterates that Chapter 15: Noise and Vibration of the Environmental Statement [APP-053] concludes that, with the implementation of mitigation, no likely significant adverse effects are anticipated resulting from noise during the construction, operation and maintenance, and decommissioning of the Scheme.</p>

7000 Acres [REP4-089; REP4-090; REP4-091 and REP4-092]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
7A-22	Summary of Issue Specific 3	General	This is the summary of oral submissions by 7000 Acres, and our comments on oral submissions made by other parties	The Applicant notes this comment.
7A-23	Summary of Issue Specific 3	National Policy Statements	The Applicant [00:33:50:05 - 00:34:25:06] noted the NPS were now designated, 7000Acres accepts this point. However, in the opinion of 7000Acres the Applicant does not take account of the entirety of the Planning Framework, Policies and clear Ministerial intent but merely selectively quotes from the NPS.	The Applicant's assessment of the Scheme against National and Local planning policy is set out in <b>WB7.5_B Planning Statement Revision B [REP4-048]</b> .
7A-24	Summary of Issue Specific 3	National Policy Statement	Within the 2024 NPS EN-1, Section 1.6 clarifies the arrangements for handling the transition between the 2011 suite and the suite due to come into force in 2024. Section 1.6 states that " <i>for any application accepted for examination before designation of the 2023 amendments, the 2011 suite of NPSs should have effect</i> ". The 2011 documents make virtually no reference to solar. Within EN-1 (2011), the Overarching Policy envisages large scale renewable energy generation from wind (offshore / onshore), Biomass, EfW, Wave and Tidal, citing the UK's abundant national resources in these areas – notably, this does not include solar. Solar is only mentioned once, to highlight the need for back-up capacity to manage intermittent generation.	The Applicant refers to the Applicant's response to comment GC-01 in <b>WB8.1.23 The Applicant's Response to Deadline 2 and 3 Submissions [REP4-066]</b> and <b>WB7.5_B Planning Statement Revision B [REP4-048]</b> .

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
7A-25	Summary of Issue Specific 3	National Policy Statement	<p>With regard to land use, the 2011 NPS EN-1 (5.10.8) requires that Applicants <i>"should seek to minimise impacts on the best and most versatile agricultural land (defined as land in grades 1, 2 and 3a of the Agricultural Land Classification) and preferably use land in areas of poorer quality (grades 3b, 4 and 5) except where this would be inconsistent with other sustainability considerations"</i>.</p> <p>The 2011 NPS EN-1 also advises that the Inspector should give little weight to the loss of poor quality land (including 3b), <i>"except... in areas... where particular agricultural practices may themselves contribute to the quality and character of the environment or the local economy."</i> Notwithstanding the unusually high proportion of land that has been assessed by the Applicant as 3b, it is clear that within the area of West Lindsey in which the West Burton Solar Project is proposed, there is a demonstrable link between agriculture, the environment and the local economy, therefore the exception should apply. Within NPS EN-3, National Policy Statement for Renewable Energy Infrastructure, solar is not mentioned in 82 pages of guidance, whereas, onshore wind, offshore wind, biomass, waste combustion, wave and tidal are all covered.</p>	<p>The Applicant notes this comment. Please refer to the Applicant's responses to comment GC-01 in <b>WB8.1.23 The Applicant's Response to Deadline 2 and 3 Submissions [REP4-066]</b>, the Applicant's response to question 1.2.4 in <b>WB8.1.21 Applicant Response to ExA First Written Questions [REP3-038]</b>, and <b>WB7.5_B Planning Statement Revision B [REP4-048]</b>.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
7A-26	Summary of Issue Specific 3	Critical National Priority	<p>Following consultation feedback, the 2024 NPS has evolved the definition of "<i>a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure</i>", where low carbon infrastructure is defined as "<i>for electricity generation, all onshore and offshore generation that does not involve fossil fuel combustion...</i>". This is an evolution of the dNPS (March 2023), which defined the CNP only "<i>for the provision of nationally significant new offshore wind infrastructure (and supporting onshore and offshore network infrastructure)</i>".</p> <p>This very recent change, following a very close margin of feedback (with 35 in agreement with the March proposed draft definition of CNP, and 39 in disagreement). It is worth noting that this is from a total of 157 responses, 61 of which were from the categories "Business / Trade Association" or "Commercial Organisation". Many of the names of these organisations are redacted from the consultation feedback report, but of the named respondents, many were bodies with interests in solar development, e.g. Solar Energy UK, Eden Renewables, EDF and Scottish Power Renewables.</p> <p>The result of this is that there is no particular emphasis within the NPS on any one technology over another, even though it is a matter of fact that not all</p>	<p>The Applicant notes that these comments are a criticism of the policy in NPS EN-1 (November 2023). Please refer to the Applicant's response to comments GC-01 and 7A-09 in <b>WB8.1.23 The Applicant's Response to Deadline 2 and 3 Submissions [REP4-066]</b>.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>technologies are able to contribute to decarbonisation in equal measure. For instance, wind is foreseen by National Grid to produce over 70% of the UK's electricity by 2050, which is presumably why it was singled out in the original definition of CNP in the March 2023 draft NPS. By contrast, solar will deliver an order of magnitude less than wind, at around 7%, even with up to 90GW of deployed capacity. The result is that the definition of CNP is rendered effectively meaningless within the NPS, as there is no differentiation between technologies, despite their differing contributions. Although the NPS equates such diverse contributors as offshore wind, solar, wave and geothermal, in weighing impacts and benefits, the Secretary of State is directed to <i>"take into account its potential benefits including its contribution to meeting the need for energy infrastructure"</i>. This allows the SoS to consider the contribution such technologies can make</p>	
7A-27	Summary of Issue Specific 3	Need	<p>The Applicant highlighted section 3.2 of the 2024 NPS EN-1, where the <i>"Secretary of State is not required to consider separately the specific contribution of any individual project to satisfying the need established in this NPS"</i>. Indeed, the concept of "need" is rendered meaningless following the debacle over "critical national priority" – if such diverse contributors as Offshore Wind, Solar and Geothermal can be classed</p>	<p>Please see the response to 7A-26 in this document.</p> <p>Regarding good design, please see the response to comment LAN-01 within <b>WB8.1.23 The Applicant's Response to Deadline 2 and 3 Submissions [REP4-066]</b>.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>equally, and therefore can contribute little in this regard to the examination process. Fortunately, the 2024 NPS EN-1 also provides plenty of more useful guidance for decision making in this case. As described above, the Secretary of State is able to consider the functional contribution a proposed development may make. In addition to this, "Good design" includes how infrastructure "relates to the landscape it sits within" and that "applying good design to energy projects should produce sustainable infrastructure sensitive to place, including... efficient in the use of natural resources, including land-use". The scale of the West Burton project and height of panels, in comparison to the local landscape and villages, demonstrates a design that lacks sensitivity to place.</p>	
7A-28	Summary of Issue Specific 3	Soils and Agriculture	<p>Allied to land use, is the subject of the use of agricultural land. The NPS states "<i>Where development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality</i>" (this principle of a "hierarchy" of preferred land use is further expanded in emerging NPS EN-3). In the case of West Burton, the Applicant has focused entirely on the quality of agricultural land, not demonstrated a necessity to use agricultural land.</p>	<p>With reference to agricultural land classification, paragraph 2.10.29 of NPS EN-3 (November 2023) notes that land type should not be a predominating factor in determining the suitability of a site location. The Applicant's response to reference KnPC-11 in <b>The Applicant's Responses to Relevant Representations [REP1-050]</b> outlines the site selection process that was used, the conclusions of which justify the land that has been included in the Scheme. Agricultural land quality has been taken into account in this assessment, which is shown through</p>



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				the removal of land from the Site, which, based on detailed assessment, was showed to be best and most versatile. Where BMV land has been included in the Order limits, the reasons are set out in Table 5.9 of Chapter 5 Alternatives and Design Evolution of the ES [APP-043].
7A-29	Summary of Issue Specific 3	Design and Alternatives	<p>Also, within "Good Design", the NPS notes the importance of "<i>the functionality of an object – including fitness for purpose and sustainability</i>". Section 2 of 7000 Acres WR REP1A-026 ("The role of Solar in Energy Provision and Decarbonisation") describes the constraints around the functional contribution solar can make to energy and decarbonisation, which are limited to the point where the benefits do not outweigh the harms arising from ground mounted solar installation at such a large scale.</p> <p>From the NPS, in decision-making, the Secretary of State "<i>should be satisfied that the applicant has considered both functionality (including fitness for purpose and sustainability) and aesthetics including its contribution to the quality of the area in which it would be located, any potential amenity benefits, and visual impacts on the landscape</i>"</p>	<p>The Applicant has responded to REP1A-026 in <b>WB8.1.18 Response to Written Representations at Deadline 1 Part 2 [REP3-035]</b>.</p> <p>Please refer to the Applicant's response to 7A-10 and LAN-01 in <b>WB8.1.23 The Applicant's Response to Deadline 2 and 3 Submissions [REP4-066]</b>.</p>

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7A-30	Summary of Issue Specific 3	Alternatives	<p>With regard to alternatives the NPS states that the <i>"decision making process of the existence (or alleged existence) of alternatives to the proposed development is, in the first instance, a matter of law"</i>. The NPS recommends that the <i>"Secretary of State should be guided in considering alternative proposals by whether there is a realistic prospect of the alternative delivering the same infrastructure capacity (including energy security, climate change, and other environmental benefits) in the same timescale as the proposed development"</i>. In the case of West Burton, the Applicant has created an extremely narrow envelope of alternatives, starting with grid connection access, then has sought to secure a sufficient volume of land to maximise use of the grid connection. On that basis, the discussion of alternative sites by the applicant is superficial, in that rooftop solutions, or use of brownfield sites were never genuine considerations. On the other hand, in order to decarbonise effectively, even without retrofitting solar to existing rooftops, the capacity of West Burton could be deployed each year by making use of new-build domestic rooftops, thereby providing a much more rapid deployment of the same capacity, with fewer adverse impacts than the West Burton scheme. The NPS also describes the impacts on landscape, stating that effects <i>"arise not only from the sensitivity of the landscape but also the</i></p>	<p>The Applicant's approach to consideration of alternatives is set out in their response to comment 7A-11 in <b>WB8.1.23 The Applicant's Response to Deadline 2 and 3 Submissions [REP4-066]</b>.</p> <p>In relation to the point raised about deploying solar on new build domestic rooftops, the Applicant has stated many times that it supports rooftop solar, however, this cannot be considered to be a viable alternative to the Scheme.</p> <p>The consideration of effects of the Scheme on the landscape are set out in the Applicant's response to comment 7A-12 in <b>WB8.1.23 The Applicant's Response to Deadline 2 and 3 Submissions [REP4-066]</b>.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p><i>nature and magnitude of change proposed by the development</i>", noting that <i>"the scale of energy projects means that they will often be visible across a very wide area"</i>. The Secretary of State should judge <i>"whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project"</i>. The combination of the colossal scale of ground mounted solar projects such as West Burton as well as the height of panels, is not sensitive to the landscape.</p>	
7A-31	Summary of Issue Specific 3	Scale	<p>At ISH 3, the Applicant attempted to portray that the wording of NPS EN-3 indicated an example of a scheme that meets the minimum threshold requirements for an NSIP-scale project. When the point was raised by the ExA and 7000 Acres about the use of the word <i>"typical"</i>, the Applicant concentrated on this point of <i>"minimum threshold example"</i>, or that the example was of a <i>"typical 50MW scheme"</i>. It is clear NPS EN-3 provides this as an illustration, and while it is understandable that there will be variability in the size, deployment of 500MW, perhaps overplanted to 700-800MW is a vastly different proposition than that indicated within the NPS, perhaps by up to 15 times the scale of a <i>"typical"</i> scheme in EN-3</p>	<p>Please refer to the Applicant's response to comment ENE-09 in <b>WB8.1.23 The Applicant's Response to Deadline 2 and 3 Submissions [REP4-066]</b>.</p>

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7A-32	Summary of Issue Specific 3	Best and Most Versatile Land	<p>The Applicant does not seem to be aware of the recent update to the NPPF, including footnote 62. The Applicant conveniently ignores the need to avoid using BMV land shown in EN-3, paragraphs 2.10.29, 2.10.30 and 2.10.145. The principle of avoiding BMV land has been upheld in the High Court - <a href="https://www.bailii.org/ew/cases/EWHC/Admin/2024/295.html">https://www.bailii.org/ew/cases/EWHC/Admin/2024/295.html</a> Importantly, the High Court case confirmed that the Written Ministerial Statement of March 25th 2015 remains extant and relevant, contrary to the Claimant's argument that recent amendments to 'net zero' target and delivery budgets had reshaped the policy framework for renewable energy. To avoid repetition, we have made our detailed comments on this point under Item 6.b.</p>	<p>The Applicant notes that Footnote 62 of the NPPF states that <i>"The availability of agricultural land used for food production should be considered, alongside the other policies in this Framework, when deciding what sites are most appropriate for development"</i>. The Applicant's position is that Footnote 62 of the NPPF should be read in the context of NPS EN-3 (November 2023) which recognises that solar farms may be located on agricultural land where necessary (Paragraph 2.10.29).</p> <p>The Applicant's approach to site selection is set out in Chapter 5 Alternatives and Design Evolution of the ES and <b>6.3.5.1_A Environmental Statement - Appendix 5.1 Site Selection Assessment Revision A [AS-004]</b>. This demonstrates that the Applicant did consider previously developed land and only included BMV land where necessary. Please also refer to the Applicant's summary on agenda item 6b in <b>WB8.1.28 Written Summary of the Applicant's Oral Submissions at Issue Specific Hearing 3 and Responses to Action Points [REP4-070]</b>.</p> <p>The Applicant's position is that the Written Ministerial Statement is extant but needs to be considered in the context of the more up to date Government policies set out in NPS EN-1 and EN-3 (November 2023). The reference to the Town and Country Planning Act solar</p>

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				scheme at Lullington is not considered to be relevant given that this Scheme is a NSIP and the decision being challenged in that case was made prior to the Energy NPS being adopted in January 2024. ..
7A-32A	Summary of Issue Specific 3	Electricity Generated	<p>The Applicants Statement of Need “expresses agreement with Government’s view that decentralised and community energy systems are unlikely to lead to the significant replacement of large-scale infrastructure”. The Applicant has frequently recycled this statement, to imply agreement with the Government that there is a need for large-scale solar in favour of decentralised alternatives, without acknowledging that functionally, there is equivalence between a 500MW capacity ground-mounted solar farm and 125,000 households with a 4kW solar rooftop installation. It is this fact that has enabled Germany to install 70% of the 80GW of solar installed in the country, on domestic and commercial rooftops.</p> <p>7000 Acres agree that, in more general terms, large-scale infrastructure will still be required for many aspects of the electricity system that cannot be disaggregated to the same extent as solar, e.g. for offshore wind, nuclear assets and electricity networks.</p> <p>Section 3.3 of document WB7.11 Statement of Need [APP-320] specifically paragraphs 3.3.2, 3.3.5 and 3.3.11, describes the Government’s view that large</p>	<p>The Applicant has provided a response on rooftop solar as part of its response to ExA’s FWQ 1.1.20, 1.9.1, and 1.9.8 in <b>WB8.1.21 Applicant Response to ExA First Written Questions [REP3-038]</b>.</p> <p>The Applicant has consistently agreed that rooftop solar can make a contribution to decarbonisation but the critical point made in <b>7.11 Statement of Need [APP-320]</b> (which includes reference to Government’s position e.g. at Para 3.3.11 with which it agrees), is that rooftop solar alone will not deliver the amount of solar capacity needed to deliver a decarbonised electricity system by 2035. Therefore the deployment of rooftop solar is not an alternative to the Scheme and does not diminish the need for the Scheme.</p> <p>The Applicant refers also to Sections 8.5 and 8.6 of <b>7.11 Statement of Need [APP-320]</b> which highlights the key functional differences between transmission-connected and distribution-connected generation assets, including transparency of dispatch to the Electricity System Operator and responsiveness to its</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			capacities of low-carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar". This support for large scale solar as part of the 'answer' to net zero and energy security has been repeated in its Powering Up Britain published in March 2023.	signals and provision of power ready for bulk transfer to other areas of the country.
7A-33	Summary of Issue Specific 3	Electricity Generated	<p>It is worth scrutinising the elements that comprise the Applicant's statement:</p> <ol style="list-style-type: none"> <li><i>"the Government's view that large capacities of low-carbon generation will be required to meet increased demand"</i></li> </ol> <p>While large capacities of low-carbon generation will be required, this must not be directly equated to mean this must be delivered through large capacity installations, i.e. that the capacity cannot be delivered through aggregation from smaller installations.</p> <ol style="list-style-type: none"> <li><i>"a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar"</i>.</li> </ol> <p>This statement is taken directly from the NPS, but it is a very loose phrase that fails to consider that wind and solar will make contributions at very different scales.</p>	<p>The Applicant refers to sections 3.3, 7 and 8 of <b>7.11 Statement of Need [APP-320]</b>, which explains the importance of solar in achieving the Government's net zero commitments.</p> <p>The Applicant also refers to the Applicant's summary under agenda item 4b in <b>WB8.1.27 Written Summary of the Applicant's Oral Submissions and Response at Issue Specific Hearing 3 and Responses to Action Points [REP4-070]</b> and the Applicant's response to 7A-32A above in this document, in particular, the Applicant's response to ExA's FWQs 1.2.4, 1.9.1 and 1.1.20 in <b>WB8.1.21 Applicant Response to ExA First Written Questions [REP3-038]</b>.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>Wind is expected to produce c. 70% of the UK's electricity by 2050, and therefore the system at that time is likely to be predominantly composed of wind alone. Solar will provide only c. 7%, even in scenarios of 90GW of installed solar capacity. The Applicant has used these words to convince the Examining Authority that "wind and solar" together will provide the predominant supply, glossing over the very minor role that solar will play, and by implication, their scheme, will make. This support for large scale solar as part of the 'answer' to net zero and energy security has been repeated in its Powering Up Britain published in March 2023." The Applicant has been selective with the text chosen from Powering Up Britain, omitting that the same sentence continues to state that the Government is "looking for development mainly on brownfield, industrial and low/medium grade agricultural land". Not only has the Applicant failed to make use of any brownfield or industrial land, but they have also failed to justify the need to consume farmland, as is required by the NPS. The Applicant has chosen not to mention that the same paragraph reinforces the Government's need for rooftop solar, and that the Government has accepted "the recommendation from the Independent Review of Net Zero to set up a taskforce to deliver on this ambition", i.e. to co-ordinate the effective and efficient delivery of</p>	

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			the 70GW solar ambition in the UK. Once again, the Applicant's answers are shown to be partial, and therefore cannot be relied upon as evidence in this examination.	
7A-34	Summary of Issue Specific 3	Community Impacts	7000 Acres made the point that Community benefits were a prominent part of the initial communications by the Applicant, in brochures and display stands. Since then, the idea of community benefits has barely featured in the course of the examination or in the vast body of material produced by the Applicant . As Fillingham Parish Meeting, for instance, we have not been approached and we are not aware of anything that has been put to the community. In reality, the more that people have found out about the scale, size, dimensions and impacts, the more it is felt that no community benefit scheme could ever compensate for living adjacent to large areas of 4.5m high panels that could never realistically be mitigated with hedgerows. The idea of a community benefit scheme is considered by many to be nothing more than an inadequate fig leaf.	<p>The Applicant notes this comment.</p> <p>The Applicant refers to previous responses made on community benefits at reference SIPC-23 of <b>The Applicant's Responses to Relevant Representations [REP1-050]</b>.</p> <p><b>6.2.8 ES Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> assesses the landscape and visual impacts of the Scheme.</p>
7A-35	Summary of Issue Specific 3	Replacement of panels	<p>There are 2 issues to consider, the physical life of the solar panels and the economic life of the solar panels.</p> <p>Firstly the physical life. The Applicant has claimed a solar PV panel failure rate of 0.4% per annum, which</p>	<p>The Applicant refers to it's response to reference WAS-02 in <b>The Applicant's Responses to Relevant Representations [REP1-050]</b> and the Applicant's summary under agenda item 4a in <b>WB8.1.27 Written Summary of the Applicant's Oral Submissions and</b></p>



Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>means that 24% will fail and need replacing over the 60-year life of the scheme and potentially 60% of the panels will last 100 years. The Applicant has not presented any evidence for this low failure rate and anticipated life of the panels. Equipment failure rates do not tend to be linear but follow a "bathtub curve", with a relatively high rate at the start of the project due to manufacturing faults, damage during transport and installation errors. The initial failure rate will decline for a few years and then increase again at an accelerating rate. Assuming a very low and linear failure rate is not a reasonable worst case assumption.</p> <p>Secondly the economic replacement rate. The energy generating capability of solar PV panels typically degrade by 1% per annum. Taking this latter point into account, after 60 years the remaining panels will only be producing 40% of their initial output. Current industry evidence suggests that an economic life of a solar PV panel is 20 years, which takes into account the failure rate, degradation in energy generation and new technology becoming available. Using this reasonable worst-case assumption, the solar PV panels would be replaced twice (at 20 years and 40 years) during the life of the scheme. The Applicant's Chapter 7 takes no account of replacing the solar panels, except for when</p>	<p><b>Response at Issue Specific Hearing 3 and Responses to Action Points [REP4-070].</b></p> <p>Please refer to the Applicant's response to the ExA's Second Written Question 2.9.3 [EN010132/EX5/WB8.1.34] relation to replacement rates.</p> <p>The <b>8.2.3 Review of Likely Significant Effects at 60 Years [REP1-060]</b> concludes there is no change to the assessment on likely significant effects for an operational period of up to 60 years.</p> <p>Please see the Applicant's response to 7A-50 and 7A-51 below in this document in relation to the definition of 'maintain' in the <b>WB3.1_F Draft Development Consent Order Revision F [EN010132/EX5/WB3.1_F]</b>.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>they fail. The Applicant's Review of Likely Significant Effects at 60 Years (EX1/WBB 2.3) states that extending the life of the scheme from 40 to 60 years will have no additional impacts, i.e. there is no intention to replace the panels on economic grounds, merely failed units.</p> <p>Either the Applicant will replace the solar PV panels, based on their economic life, to maintain the energy generation of the scheme, or they will only replace panels that have failed. In the former case, the current Chapter 7 and Review of Likely Significant Effects at 60 Years are incorrect and misleading. In the latter case, the total energy generation of the scheme over its life is much less than claimed and so the Applicant's Chapter 7.8.61 claiming "<i>a total energy generation figure of around 21,956,988 MWh over the estimated 40-year assessed lifetime</i>" is incorrect and misleading. The Applicant's overall documentation is inconsistent and misleading; either they will maintain the generating capacity of the scheme, in which case their GHG and transport assessments are incorrect, or they will only replace failed units, in which case their electrical generating claims are wrong. This is another example of where the Applicant has not followed Advice Notice Nine and submitted inconsistent documentation that does not use reasonable worst-case assumptions.</p>	

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>Miss Broderick for the Applicant stated at 00:41:32:28 - 00:42:13:10 "obviously any operator of a generating station will want to make sure it is operating as efficiently as possible and generating as much energy as it can." This statement implies that panels will be replaced more frequently to ensure the scheme is "operating as efficiently as possible".</p> <p>The current definition of "maintain" in the dDCO is vague and wide ranging, giving the Applicant/Operator carte blanche to change panels at will.</p>	
7A-36	Summary of Issue Specific 3	Size of PV infrastructure	<p>ExA's Question <i>"During the written questions. The first set of written questions. There was a question in there about the existence of anything of comparable sized panels around about the 4.5m. And the response was that I suppose really the question is if a member of the community wants to go and see what one of these solar farms look like with four meter high panels, where could they go? The answer was that there are some consented schemes within the UK, but my understanding is that there isn't anything comparable at this point in time, certainly in the UK."</i></p> <p>7000Acres: There are currently no examples of 4.5m high panels in the UK. There are examples abroad, such as the Xlinks scheme in Morocco that will use 4.5m high sun tracking panels<sup>2</sup>. This scheme will be connected to the UK by a 3,800km sub-sea cable. It will</p>	<p>In relation to other examples of 4.5m high panels please refer to the Applicant's response to question 1.1.19 in <b>WB8.1.21 Applicant Response to ExA First Written Questions [REP3-038]</b> and subsequent update on page 12, response to action point 1 in <b>WB8.1.27 Written Summary of the Applicant's Oral Submissions &amp; Responses at Issue Specific Hearing 3 and Responses to Action Points [REP4-070]</b>.</p> <p>The Applicant notes that the Xlinks Morocco-UK Power Project referred to requires a DCO, for which an application has not been submitted yet, so this is not a project which will be operational in the near future. Further, <i>"planning documents published on the website of Europe's transmission system operators"</i> (see report at UK-Morocco power cable could be scrapped</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>provide 11.5GW of renewable energy to the UK, typically providing 3.6GW of reliable energy for an average of 19 hours a day. In summer, the Xlinks solar panels will generate three times as much as equivalent panels in the UK and five times as much during the winter months. In total, the scheme will provide circa 8% of Britain's energy needs and so greatly reduces the need to cover productive UK farmland with inefficient solar panels. The UK has a 70GW (peak) goal for solar power. At an average yield of 11%, this would provide an average of 7.7GW of electricity. The UK already has 16GW of solar power, providing an average of 1.76GW. Adding the Xlinks capacity to the current capacity will result in 5.36GW (3.6GW from Xlinks and 1.76GW current capacity) or 70% of the Governments required output from solar (11% of 70GW). Therefore, inefficient schemes, such as West Burton Solar are likely to be rendered obsolescent in a short period of time.</p> <p>Xlinks has confirmed grid connections in 2029 and 2031, so in a similar timescale to the Lincolnshire solar NSIPs.</p> <p>Solar NSIPs such as "Sunnica Energy Farm" use 2.5m high solar panels, as will the local (35 MW) Stow Park solar scheme: these and other schemes have clearly followed best practice and attempted to mitigate the</p>	<p>in favour of Germany (energyvoice.com)) suggest that X-Links may be evaluating the potential for their project to provide power to other European markets either instead of or as well as the UK.</p> <p>It is therefore not the case, that the X-Links project can yet be relied upon to deliver power to the UK, from a specified date, and at or above a specified capacity or contribution. The Xlinks website FAQ section confirms that agreement has been reached with National Grid for two 1.8GW connections so 3.6GW is the maximum generation capacity proposed, not 11.5GW.</p> <p>The references made in relation to the Sunnica Energy Farm is a separate application for development consent to the Scheme. An issue raised on one DCO application is not automatically transferable to another as LVIA impacts are specific to the location of the development.</p> <p>In reference to good design please refer to the Applicant's response to LAN-01 in <b>WB8.1.23 The Applicant's Response to Deadline 2 and 3 Submissions [REP4-066]</b>.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			visual impact of their panels. The Applicant has not explained why it needs the unprecedented 4.5m high solar panels and why it has not followed good practice by minimising the impact of their scheme.	
7A-37	Summary of Issue Specific 3	BESS	<p>Firstly, EN-1 explicitly excludes all forms of electrical storage from the NSIP process, except for pumped hydro. 7000Acres has made the case that a BESS will be the primary, or only, source of income for the majority of the year. Therefore, it provides an additional income and so should not be considered as Associated Development. 7000Acres is pleased to see the Applicant's Outline Battery Storage Safety Management Scheme Revision A now takes account of thermal runaways, as the previous version was deficient.</p> <p>7000Acres retains concerns over the fire water provisions secured in the dDCO. The Applicant has changed from assessing a current (LeClanche – paragraph 1.1.7) to a hypothetical future system and so is not applying a reasonable worst-case assessment. The Applicant's specialist, Mr Gregory, appeared to imply that 2 hours of water held on site would be sufficient for future battery systems. This is not borne out by evidence from recent BESS events, where thermal runaways required cooling for many hours. Mr Gregory then confirmed at 01:34:57:20 -</p>	<p>The Applicant's response to the ExA's question 1.1.12 in <b>WB8.1.21 Applicant Response to ExA First Written Questions [REP3-038]</b> explains how the Applicant considers the BESS constitutes associated development.</p> <p>The generic BESS design is based on popular current high energy density LFP BESS 'cabinet' systems which represents a higher threat of explosion risk due to the lack of 'free air' within the enclosure. The Applicant is confident that the works that form part of Work No 2 provide sufficient protection. There is commitment in the <b>WB7.9_A Outline Battery Storage Safety Management Plan [REP3-032]</b> that site water requirements are confirmed at the detailed design stage when a BESS system is selected, and site-specific risk assessments can be conducted.</p> <p>The Applicant has committed to the NFCC's recommended minimum volume of firefighting water for the BESS site and will increase the volume, if necessary, after final risk assessments are conducted. Drainage systems will be designed to accommodate the volume of water that has been verified by a BESS</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>01:35:36:00 that "so normally, a 2.5MW hour container, you know, probably would have burnt out sort of in, in sort of 12 hours."</p> <p>As the Applicant's specialist confirmed that it is foreseeable that a thermal runaway will last for circa 12 hours, the 2 hours of water supplies secured in the dDCO, and the lack of local main drains and hydrants is clearly insufficient for a foreseeable thermal runaway. Sufficient water supplies, appropriate bunding and storage of fire water must be secured in the dDCO and associated Works No.2.</p>	<p>specialist Fire Protection Engineer and agreed with Lincolnshire Fire and Rescue (LFR).</p> <p>The fire duration of a BESS thermal runaway is not relevant to the volume of water required on site because Peak Heat Release Rates (PHRR) generating maximum heat flux levels typically only occur for 10-30% of a full burn out time. Site specific consequence modelling will be conducted to demonstrate that equipment spacing, and BESS thermal insulation ratings are sufficient to minimise any requirement for boundary cooling by LFR even during PHRR flaming levels.</p> <p>Please also see the Applicant's response to agenda item 4c in <b>WB8.1.27 Written Summary of the Applicant's Oral Submissions and Response at Issue Specific Hearing 3 and Responses to Action Points [REP4-070]</b>.</p> <p>The Applicant presumes the 'recent BESS events' is a reference to the previous BESS fire in Liverpool in September 2020. The Liverpool BESS system was deficient in a range of safety and mitigation features which will be integrated into the BESS system selected for the Scheme. For example, the Liverpool BESS system did not integrate an explosion prevention or protection system, did not integrate an internal water fire suppression system, did not</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				integrate a liquid cooling system for battery modules, did not integrate gas detection systems. Sections 4.1.5, 4.1.6, 5.3.2 of the OBSSMP [REP3-032] shows how these safety and mitigation measures have been incorporated into the Scheme.
7A-37A	Summary of Issue Specific 3	Soils and Agriculture	<p>At 00:18:50:02 - 00:19:29:27 the Applicant's specialist, confirmed that extending the life of the scheme from 40 to 60 years would have no additional benefit to the soil health: <i>"The increase in soil organic matter at 60 years, therefore may be only marginally better than that achieved at 40 years. All soils will differ in the rate of recovery. As a rule of thumb, we'd normally say that for a change of management, you would need about a 10 to 15 year period to notice a signal in terms of soil organic matter over the noise of soil organic matter."</i></p> <p>The Applicant claimed that the land would remain farming land as sheep could graze it. Sheep farming is not a current feature of this region and is unlikely to be economically viable due to the current price of wool and lamb meat. As sheep grazing is not secured, a reasonable worst case is that the land will be covered in rough grassland and invasive weeds.</p> <p>Photographs of sheep are often shown in photographs by solar developers but very rarely used in practice <i>[a</i></p>	<p>As outlined in the Applicant's response to agenda item 6a in WB8.1.27 Written Summary of the Applicant's Oral Submissions and Response at Issue Specific Hearing 3 and Responses to Action Points [REP4-070], reverting arable land to pasture allows the soil organic matter and soil health to recover back towards the higher equilibrium of grassland, away from the lower equilibrium of cultivated arable land. Although the rate of recovery will slow over time as the equilibrium is approached, it is incorrect to claim that there would be no additional benefit after 40 years and the Applicant's specialist made no such statement.</p> <p>Improvement in soil health and soil organic matter content may be marginal after 40 years, but the wider environmental benefits that stem from these continue. These include improved rainfall infiltration and reduced soil erosion. These will in turn benefit flood risk and water quality through the attenuation of rainfall and the reduced delivery of sediment with</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p><i>number of photos are included within the representation]</i></p>	<p>associated nutrients, pesticides and faecal indicator organisms to surface waters.</p> <p>In relation to sheep grazing, please see the Applicant's response to SSPC-31 in <b>WB8.1.17 Response to Written Representations at Deadline 1 Part 1 [REP3-034]</b>.</p> <p>With regard to 'rough grassland and invasive weeds' the land below the solar PV will be in a fallow of low input pasture and no more vulnerable to invasive weeds than any other field of low input pasture. The land will benefit from the suppression of arable weeds such as black grass (<i>Alopecurus myosuroides</i>) with grazing and/or mowing preventing such weeds setting seed, and the fallow outlasting existing seed dormancy and viability. Rough Pasture is usually associated with challenging environments, such as uplands, where land is unimproved and extensively grazed. Rough grazing is not in itself problematic but there is no conceivable prospect of the land with deep, clay rich and nutrient enhanced soils found at the site, being taken over by vegetation associated with the shallow, acid and sandy soils common on moorland.</p>



Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				It is not therefore a reasonable worst case scenario that the agricultural land within the solar farm will be covered in rough grassland and invasive weeds.
7A-38	Summary of Issue Specific 3	Soils and Agriculture	<p>7000Acres asked what chemicals will be used to clean the panels and what effect these chemicals will have on the soil health. The applicant was unable to respond and said that they would investigate and reply at the next submission, however they believed that the panels would be cleaned using water.</p> <p>Investigations by 7000Acres would indicate that de-ionised water should be used and that if soiling remains on the panels after rinsing, repeat the cleaning procedure or if any soiling continues to prove stubborn, IPA (Isopropyl Alcohol) with a concentration of less than 10% may be used. If this is the case then can the applicant confirm that the use of IPA will have no effect on the soil health?</p>	Please refer to the Applicant's response to question 2.2.4 in <b>WB8.1.34 The Applicant's Response to ExA's Second Written Questions [EN010132/EX5/8.1.34]</b>
7A-39	Summary of Issue Specific 3	National Planning Policy Framework	<p>7000Acres strongly disagrees with the Applicant who stated at 00:30:59:23 - 00:31:37:18 that the footnote to NPPF footnote 62 does not apply to this scheme. Footnote 62, states <i>"Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. The availability of agricultural land used for food production should be considered, alongside the</i></p>	The Applicant's position on the application of NPPF footnote 62 to the Scheme, please see the response to 7A-32 above in this document. The Applicant's response to agenda item 6b in <b>WB8.1.27 Written Summary of the Applicant's Oral Submissions and Response at Issue Specific Hearing 3 and Responses to Action Points [REP4-070]</b> outlines why some BMV land has been included in the Scheme.

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p><i>other policies in this Framework, when deciding what sites are most appropriate for development."</i></p> <p>This statement is consistent with other documents and Ministerial Statements<sup>5</sup>. For example, the Letter from the Chief Planner<sup>6</sup> that accompanied the issue of the updated NPPF, in December 2023, stated:</p> <p><i>"A high-level description of the key changes is provided below, and was set out by the Levelling Up Secretary in his speech and accompanying WMS, but for the full detail and understanding of the policy please refer to the text of the NPPF itself. In headline terms, the new NPPF:</i></p> <ul style="list-style-type: none"> <li><i>• gives greater protection to agricultural land through additional reference to the need to address food production, maintaining the emphasis on best and most versatile (BMV) land;"</i></li> </ul> <p>As the update to the NPPF, and associated letter from the Chief Planner, were published in the same timeframe as the draft NPS, then it is clear that Footnote 62 is current planning policy and must be given due weight. For the Applicant to state it does not apply is clearly wrong and not supported by any evidence.</p> <p>A recent High Court judgement upheld the point that use of BMV land needs to be justified by the most <i>"compelling evidence"</i>. The Applicant has repeatedly</p>	<p>Food security is addressed in the Applicant's responses to FWQ 1.2.9 in <b>WB8.1.21 Applicant Response to ExA First Written Questions [REP3-038]</b> and SOI-02 in <b>WB8.1.19 Response to Written Representations at Deadline 1 Part 3 [REP3-036]</b>.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>failed to provide compelling evidence why BMV land needs to be used for this scheme. Furthermore, it contradicts the argument that recent amendments to the NPS have reshaped the framework for renewable energy. This principle is also consistent with the House of Commons Environmental Audit Committee Report<sup>8</sup>, 29 November 2023, paragraph 201 that states: <i>"The Government should designate food security as a public good and incorporate food security and environmental goals more explicitly in the design of the Environmental Land Management schemes."</i></p>	
7A-40	Summary of Issue Specific 3	Agricultural Land Classification	<p>One of the criteria that the Applicant keeps repeating to everyone is that the results of the ALC survey have a significant weighting. They have alluded to this again in agreeing that West Burton 4 was removed from the scope of this proposal, before the application was submitted, because of the results of the ALC survey for this proposed location. Another element of their proposal is the references that they keep making to the farm businesses and the benefits that they will receive from this development. We therefore wish to bring to everyone's attention the data manipulation that IGP have utilised in their application.</p> <p>Farm Business A relates to West Burton 1. The ALC results that they have published for the location identify that the land comprises:</p>	<p>As outlined in the Applicant's response to representation in 7A-107 in <b>WB8.1.18 Response to Written Representations at Deadline 1 Part 2 [REP3-035]</b>, it is not appropriate to assess ALC grade by landholding, as land ownership and occupation are subject to change.</p> <p>The Applicant's response to agenda item 6b in <b>WB8.1.27 Written Summary of the Applicant's Oral Submissions and Response at Issue Specific Hearing 3 and Responses to Action Points [REP4-070]</b> outlines why some BMV land has been included in the Scheme.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>Grade 3a: 18.4Ha 20.2%</p> <p>Grade 3b: 72.8Ha 79.8%</p> <p>Total: 91.2Ha BMV 20%</p> <p>Farm Business B relates to West Burton 2. The ALC results that they have published for the location identify that the land comprises:-</p> <p>Grade 2: 2.5Ha 0.7%</p> <p>Grade 3a: 11.9Ha 3.4%</p> <p>Grade 3b: 332.9Ha 95.9%</p> <p>Total: 347.3Ha BMV 4%</p> <p>Farm Businesses C and D relates to West Burton 3. The ALC results that they have published for the location identify that the land comprises:-</p> <p>Grade 1: 19.3Ha 5.0%</p> <p>Grade 2: 6.6Ha 1.7%</p> <p>Grade 3a: 148Ha 38.9%</p> <p>Grade 3b: 205.5Ha 53.9%</p> <p>Non-Agricultural 2Ha 0.5%</p> <p>Total: 381.4Ha BMV 46%</p>	

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>However if you split WB3 into Farm C and Farm D you get a different perspective on the results which become:</p> <p>Farm Business C</p> <p>Grade 1: 3.8%</p> <p>Grade 2: 4.2%</p> <p>Grade 3a: 58.7%</p> <p>Grade 3b: 33.3%</p> <p>BMV 67%</p> <p>Farm Business D</p> <p>Grade 1: 17.2%</p> <p>Grade 2: 7.7%</p> <p>Grade 3a: 11.2%</p> <p>Grade 3b: 63.9%</p> <p>BMV 36%</p> <p>The Grade 1 and Grade 2 land included in Farm D could also be easily removed from this application as it is located in two fields to the very south of the proposed site. As 7000Acres has demonstrated in Item 6.b, all BMV land must be removed from the scheme</p>	

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			unless the Applicant can provide compelling evidence for its use.	
7A-41	Summary of Issue Specific 3	Biodiversity Net Gain	<p>7000Acres wishes to highlight the House of Commons Environmental Audit Committee Report, 29 November 2023, paragraph 319 that states: <i>"It is also the case that many of the countries from which the UK imports food are climate-stressed, potentially jeopardising supply in the future. Furthermore, because UK food production tends to be relatively intensive in nature, any production offshored could triple or quadruple the biodiversity impact, as explained by Dr Elizabeth Boakes:</i></p> <p><i>Every hectare of arable land that we convert to housing or something and then offshore the food production must be replaced by on average 2.9 hectares of land overseas, which will often be in tropical countries that will, therefore, have a much higher biodiversity impact, sometimes three to four times higher than in the UK."</i></p> <p>When considering the Biodiversity Net Gain of this scheme, account must be taken of the impact of moving food production overseas and the adverse biodiversity impact. Unless the Applicant is claiming that the food produced on the scheme's land does not need to be replaced, then (applying a reasonable worst case assessment) the biodiversity gains claimed by the</p>	<p>Page 87, Figure 2.1.1a of the United Kingdom Food Security Report shows the UK food production to supply ratio from 1960 has remained stable for the last quarter century.</p> <p>This ratio is based upon the economic value of the food. On page 96 the report points out that the UK is largely self sufficient in grain production. Page 99 notes that the UK produces a roughly equivalent volume to our consumption of meat, milk and eggs.</p> <p>Page 134 notes that soil health is essential to the long term security of food production in the UK. Page 135 notes that climate change presents significant risks to food production and security. The Scheme will serve to combat climate change as well as deliver an improvement in soil health. The UK Food Security Report does not identify land use change to solar as a threat to UK food security.</p> <p>The UK continuously simultaneously imports and exports foodstuffs. The balance of import and export changes in regard to multiple factors. On page 136 the UK Food Security Report illustrates some of the volatility in yield that is common from year to year.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			Applicant should be divided by four to determine the true Biodiversity Net Gain.	<p>This balance is not sensitive to solar farm development.</p> <p>The Applicant's position is that food production is not relevant to the BNG calculations and this is not taken into account in the metric produced by Natural England.</p>
7A-41A	Summary of Issue Specific 3	Drainage and Flooding	<p>At 01:17:26:23 - 01:17:57:15, Mr Rigby for the Applicant stated that the 4.5m high solar panels will not be solid unit but will have gaps allowing drainage. These gaps are not secured and so must be included in the Applicant's Concept Design Parameters and Principles. If suitable gaps are not secured, a reasonable worst case assumption is that in the future solar panels could be single units and therefore increase the risk of flooding.</p> <p>The Applicant claimed that the installation and operation of solar panels will not affect the surface runoff. Mr Rigby at 01:17:57:17 - 01:18:30:25 stated: <i>"the available research that we have, which is the McEwen report, which is a US report, but it is the best that we've got, shows that panelled areas on grassed fields have a minimal impact on surface water runoff. In fact, I believe the wording is negligible"</i>.</p> <p>7000Acres request the ExA takes account of recent research by the Welsh Government<sup>10</sup> and others that</p>	<p>The applicant notes the additional Soil Policy Evidence Programme provided by the author.</p> <p>The Welsh Government report 'The impact of solar photovoltaic (PV) sites on agricultural soils and land quality Dated March 2023' states that: 'There is likely to be some instances of run-off from the solar panels, which could result in the compaction of soils at the base of the panels (Choi et al,2020)', however, no further details are provided in what 'instances' surface water run-off could be exacerbated. A further review of the referenced literature (Cook, 2011) states that site preparation for PV arrays typically includes the removal of vegetation and can degrade soil, resulting in significant increases in onsite runoff and soil erosion. Therefore a common finding is that when vegetation cover is not consistent and underlying soils are not cohesive surface water runoff may increase.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			installing large solar arrays on farmland results in deep soil compaction, increased water runoff and runoff from panels can lead to rivulets, which can lead to soil loss by erosion. It is requested that the Applicant takes account of this research, which is publicly available: the " <i>McEwen report</i> " cited by the Applicant is not " <i>the best that we've got</i> ".	<p><b>The Outline Soil Management Plan Revision A (Clean) [REP3-016]</b> outlines principles to minimise soil structure damage, including steps to avoid and reduce soil compaction. Additionally, paragraph 5.1.2 requires the Applicant to establish dense vegetation to prevent bare soil patches and protect against raindrop impact on the soil surface. The Outline Soil Management Plan characterises the topsoils as heavy to medium textured clay and is therefore cohesive and has a low susceptibility to erosion from rain drop impact.</p> <p>In light of these considerations, while there is an acknowledgement that surface water run-off may be affected in certain instances by solar panel installation, because of the cohesive nature of the identified soils, the transition from arable to solar land use, and the mitigation strategies detailed in <b>Section 5.0 of the ES Appendix 10.1 Flood Risk Assessment and Drainage Strategy Report [APP-089]</b>, it is concluded that the Scheme is unlikely to exacerbate flooding in the area.</p>
7A-41B	Statement to OFH2	Alternative Energy Sources	There is a lot in the news about what the country must do to decarbonise, and the mounting pressure on National Grid to deliver the networks to enable offshore wind. You may have seen or heard the "Great Grid Upgrade" campaign from National Grid,	The Applicant notes this comment.



Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>explaining the need to connect offshore wind to power the UK.</p> <p>Offshore wind will provide 70% of the UK's electricity by 2050. It must, therefore, be connected to the cities across the country, and to do that, we must lay out high voltage overhead power lines – or underground cables.</p> <p>National Grid is already consulting on routes for such overhead lined across Lincolnshire, for NSIP schemes which would undoubtedly have environmental impact, but would make a significant contribution to delivering the lion's share of the country's future energy.</p> <p>It is for another examination to consider whether those benefits outweigh the harms, but there is an absolute requirement to deliver offshore wind, there is no alternative to wind being the backbone of our energy system.</p>	
7A-42	Statement to OFH2	Alternative Energy Sources	<p>Solar is different. First of all, it will deliver a fraction of what offshore wind will deliver, between 7% to 10% of the UK's electricity by 2050, even with 70GW to 90GW installed. And it doesn't need to be deployed in the way being proposed by the Applicant.</p>	<p>The Applicant refers to a previous response in reference 7A-36 in <b>The Applicant's Responses to Relevant Representations [REP1-050]</b> and its response to 7A-32A above in this document.</p> <p>The Applicant's response to reference KnPC-11 in <b>The Applicant's Responses to Relevant Representations [REP1-050]</b> outlines the site selection process that was used, the conclusions of</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>Deploying solar at scale, miles from a substation, creates unnecessary impact as well as the need for additional transmission lines.</p> <p>Despite the Applicant's protestations that their scheme is essential to deliver the UK Government's 70GW ambition, this is not the case.</p> <p>Germany is a fantastic case study for what can be achieved. Germany has already delivered 80GW of solar, without a single large-scale ground mounted scheme of size being proposed at West Burton. Their largest scheme is less than 200MW, and over 70% of their capacity is installed on domestic and commercial rooftops.</p> <p>In 2023, within a single year, Germany installed 14GW of solar. Half of this came from domestic rooftops alone.</p> <p>Remember, this is a country with 50% greater land mass than the UK – and, despite having a higher solar gain than the UK, it chooses not to squander its land resources by deploying ground mounted solar at the scale being proposed by the Applicant in the UK.</p> <p>By contrast, after 15 years, the UK has only installed 16GW of solar, and every day, we build more houses and commercial buildings without solar.</p>	<p>which justify the land that has been included in the Scheme.</p> <p>The requirement for other types of development (such as new housing) to have rooftop solar is a matter for the local planning authority and so is not relevant to this Scheme.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			In the UK, the developers argue to the Examining Authorities that their large-scale solutions are the only way to deliver the Government's ambition – but, this is clearly not the case.	
7A-43	Statement to OFH2	Alternative Energy Sources	<p>Over the years, we understand more about how we decarbonise, with clearer and louder calls for strategic co-ordination to deliver key technologies, effective use our land, and what our priorities must be.</p> <p>This is not a hollow cry from 7000Acres. Strategic co-ordination is called for in reports by the Electricity Commissioner, Chris Skidmore, by the National Audit Office, by the BEIS Committee and by the UK Climate Change Committee.</p> <p>We need independent and objective consideration of how best to deliver decarbonisation. Instead, we have a fractured landscape, where developers see opportunities and act in pursuit of their financial interests and lobby accordingly.</p> <p>We have seen this through the last twists in the development of the National Policy Statements, where the Critical National Priority to deliver Offshore Wind, has been watered down to become a Critical National Priority to deliver...any form of low carbon generation, regardless of what it can contribute. It renders any effective prioritisation utterly meaningless. Such</p>	<p>The Applicant refers to it's previous response in reference 7A-36 in <b>The Applicant's Responses to Relevant Representations [REP1-050]</b> and the <b>7.11 Statement of Need [APP-320]</b>.</p> <p>The Applicant's response to 7A-26 above in this document addresses the meaning of 'Critical National Priority'.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			jockeying is unhelpful in a world that can ill afford to put a foot wrong on the path to decarbonisation, because of shortages of skills, shortages of natural resources, shortages in supply chains, and shortages of time.	
7A-44	Statement to OFH2	Efficiency of Solar	<p>So, of course, the Applicant will reinforce their call for Urgency, given the Government's ambition for 70GW of solar;</p> <p>...but from a starting point of 16 GW already installed;</p> <p>...and 20 GW in a consenting process;</p> <p>...and 130 GW in National Grid's development connection register,</p> <p>With none of this being rooftop solar, there is a real risk that the opportunity to deliver the called for "rooftop revolution" will be redundant in the wake of this tide of ground-mounted development.</p> <p>So, isn't it any wonder that the developer is advocating for urgency?</p> <p>Their urgency is to get their scheme consented, before the Government wakes up to what it is presiding over, and the harm of having allowed such uncontrolled, uncoordinated development – which will, ultimately impede decarbonisation efforts</p>	The Applicant refers to its previous responses in references 7A-34 and 7A-36 in <b>The Applicant's Responses to Relevant Representations [REP1-050]</b> .

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
7A-45	Statement to OFH2	Alternatives	<p>So, we agree there is an urgency – but not to act rashly or in a way that will be cause for major regret. We recognise that decarbonisation is genuinely difficult. It is too complex and too challenging to leave exposed entirely to global market forces – which is why the government is scrambling to drive measures to support what really needs to be done – starting with unlocking the queue of grid connections to deliver offshore wind.</p> <p>In the course of this examination, we have highlighted many examples where the Applicant has provided a one-sided view, to support their case. Their assertions on the inadequacy of rooftop solar and the absolute need for such large-scale ground mounted solar being clear examples.</p> <p>Our real fear is that the reems of partial and mis-information presented by the Applicant, in the guise of evidence, cannot be sufficiently challenged within this process, and their words will be taken for the truth. For the region, for the country, to deliver energy security and decarbonisation, this issue is too important to leave the Applicant to be trusted to produce their own body of evidence.</p>	<p>In relation to the comments about the urgency to decarbonise, the Applicant refers to a previous response in reference 7A-36 in <b>The Applicant's Responses to Relevant Representations [REP1-050]</b>.</p> <p>The Applicant disagrees that it has provided 'one sided views' and 'partial and misinformation'. The Applicant has responded to each of 7000 Acre's assertions throughout the examination. The Applicant's responses to 7A-32A and 7A-33 above in this document address rooftop solar and large-scale ground mounted solar.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>The country has a much clearer idea about what should be done to decarbonise. Major, sensible, objective reports have laid out the priorities as follows:</p> <ul style="list-style-type: none"> <li>• Co-ordination and planning of the energy system</li> <li>• Solving grid connectivity issues – especially to deliver offshore wind generation</li> <li>• Accelerating deployment of wind and nuclear power generation</li> <li>• The need to manage energy flexibility and intermittency of renewable energy sources.</li> </ul> <p>There is absolutely no clamour for large-scale ground mounted solar. The only voices you will hear pushing these schemes is from the developers themselves. That fact alone should sound an alarm. Amongst all this noise, the Examining Authority has to pick a way through. And in this moment of turbulence, preside over a decision that will change the nature and character of the region for the rest of our lifetimes – and most of our children's lifetimes. We must all have faith this decision is right.</p> <p>Lastly, the premise of renewable energy is to protect the environment, not to destroy it in the process.</p>	

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
7A-46	Summary of ISH4	General	The 7000 Acres campaign group represents over 1,000 local residents. We have a number of specialists on our group who provide input to our submissions. However, due to their work commitments, 7000 Acres cannot always field the relevant experts at ISHs. For this reason, no oral submissions were made on noise and health matters, but we took an action to comment in writing. This document summarises our comments but please take account of the previous submissions referenced.	The Applicant notes this comment.
7A-47	Summary of ISH4	Noise	<p>7000Acres has already submitted our comments on Environment Statement Chapter 15: Noise and Vibration EN010133 APP/C6.2.15 Deadline 1 Submission – 17th October 2023.</p> <p>The Applicant has chosen to apply BS 4142:2014 as their guidance. The Method for Implementation Document for BS 41421 states <i>"it is appropriate for assessing sound levels outside a building that are from:</i></p> <ul style="list-style-type: none"> <li>• <i>industrial premises, manufacturing premises or fixed installations</i></li> <li>• <i>mobile plant, vehicles, train or ship movements within the permit boundary</i></li> </ul> <p><i>It is not appropriate for:</i></p>	<p>The Applicant refers to its response to 7A-20 above in this document.</p> <p>BS4142:2014+A1:2019 is relevant to operational noise. Section 15.4 of <b>Noise and Vibration Environmental Statement (ES) chapter [APP-053]</b> refers to, and applies guidance other than BS4142:2014+A1:2019, see, for example, paragraphs 15.4.34 and 15.4.39, which apply the Noise Policy Statement for England, Planning Practice Guidance – Noise and Association of Noise Consultants (ANC) Technical Note on BS 4142:2014+A1:2019.</p> <p>Paragraph 15.11.3 notes that alternative guidance has been used to assess noise impacts, being absolute noise levels created by the Scheme.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<ul style="list-style-type: none"> <li>• any non-human receptors, including bats, birds or other protected species</li> <li>• non-residential premises such as offices, schools, churches or outdoor areas such as recreational parks, gardens or sports grounds."</li> </ul> <p>It also states that "You must not use the standard to assess whether sound amounts to a noise nuisance. That is not within the scope of BS 4142." Applying BS 4142 alone is not sufficient to assess the noise impact on this rural location. The Applicant has not taken account of people with hearing conditions, such as hyperacusis, they have not considered the impact on outdoor life, nor have they considered the impact on bats, birds or other protected species. 7000Acres believes that the Applicant has not assessed true impact, and loss of amenity, caused by noise.</p>	<p>Accordingly, the Applicant has not limited its assessment to BS4142:2014+A1:2019.</p> <p>re-iterates that Chapter 15: Noise and Vibration of the Environmental Statement [APP-053] concludes that, with the implementation of mitigation, no likely significant adverse effects are anticipated resulting from noise during the construction, operation and maintenance, and decommissioning of the Scheme. All assessments have been undertaken with plant operating at 100% capacity and therefore representing the worst-case scenario. In reality, noise levels as a result of the Scheme will generally be lower than those predicted. Noise impact has been assessed in accordance with current British Standards.</p>
7A-48	Summary of ISH4	Socio-Economics and Health	<p>7000Acres has made a written submission at Deadline 1A on Human Health and Wellbeing. At Open Floor Hearing 1, Dr Parkin, who is a retired General Practitioner, still works for the Lincolnshire Integrated Care Board and has over 30 years experience of health in Lincolnshire, made a number of powerful points, including the need for a Health Impact Assessment.</p> <p>The Applicant has not considered health and wellbeing in a serious manner. Neither has it provided a</p>	<p>The Applicant refers to its responses to 7000 Acres previous written submissions in <b>WB8.1.18 Response to Written Representations at Deadline 1 Part 2 [REP3-035]</b> and to the responses made to comments made at both Open Floor Hearing 1 and Issue Specific Hearing 4 in <b>8.1.5 Written Summary of the Applicant's Oral Submissions at the Open Floor Hearing (OFH1) [REP1-051]</b> and <b>WB8.1.28 Written Summary of the Applicant's Oral Submissions and</b></p>



Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>competent response to the issues we have raised in our submissions. Unlike some other topics, they have not employed a specialist to assess the impact on health, merely using a general planner within the Lanpro consultancy. This has resulted in a shallow and deficient assessment that does not address the real impact on health and wellbeing caused by the individual and cumulative impacts of the numerous solar NSIPs in the region.</p> <p>The NPPF and NPS require health to be assessed in a serious manner.</p> <ul style="list-style-type: none"> <li>• NPPF Section 8 – Promoting healthy and safe communities.</li> <li>• NPPF Section 11 – making effective use of land. In particular paragraph 123:</li> </ul> <p><i>“Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land”</i></p> <ul style="list-style-type: none"> <li>• EN-1 Paragraph 4.3.1: <i>“Energy infrastructure has the potential to impact on the health and well-being (“health”) of the population. Access to energy is clearly beneficial to</i></li> </ul>	<p><b>Responses at Issue Specific Hearing 4 and Responses to Action Points [REP4-071].</b></p> <p>The Applicant also refers to its response to 7A-06 above in this document.</p> <p>The Applicant is confident that the Scheme, and the Applicant's approach to assessment is compliant with national policy as set out in National Policy Statements for Energy, and the National Planning Policy Framework. An appraisal of the Scheme against health-related policies in the NPSs and NPPF is set out in Sections 6.15 and 6.16 of <b>WB7.5_B Planning Statement: West Burton Solar Farm - Revision B [REP4-048]</b>. An assessment of national policy compliance against those policies considered most relevant to the Scheme is set out in Appendix C of the <b>Planning Statement [REP4-048]</b>.</p> <p>Furthermore, the Applicant has submitted <b>WB8.4.21.1 Environmental Statement - ES Addendum 21.1: Human Health and Wellbeing Effects [REP4-077]</b> which sets out the full assessment considerations made in the ES in regard to human health and wellbeing, demonstrating the Applicant's approach is consistent with national policy requirements.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p><i>society and to our health as a whole. However, the construction of energy infrastructure and the production, distribution and use of energy may have negative impacts on some people's health."</i></p> <ul style="list-style-type: none"> <li>• EN-1 4.3.4: <i>"As described in the relevant sections of this NPS and in the technology specific NPSs, where the proposed project has an effect on humans, the ES should assess these effects for each element of the project, identifying any potential adverse health impacts, and identifying measures to avoid, reduce or compensate for these impacts as appropriate."</i></li> <li>• EN-1 4.3.5: <i>"The impacts of more than one development may affect people simultaneously, so the applicant should consider the cumulative impact on health in the ES where appropriate. "</i></li> </ul> <p>EN-1 4.3.6: <i>"Opportunities should be taken to mitigate indirect impacts, by promoting local improvements to encourage health and wellbeing, this includes potential impacts on vulnerable groups within society, i.e. those groups which may be differentially impacted by a development compared to wider society as a whole."</i></p>	
7A-49	Summary of ISH4	Socio-Economics and Health	The Applicant has not assessed health and wellbeing in a serious manner. 7000Acres believes the Applicant must employ a healthcare specialist to conduct a professional assessment of the health and wellbeing	The Applicant respectfully disagrees with this comment and refers to the response to 7A-06 above in this document.

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			impacts caused by this and the other solar NSIP schemes in the locality. In particular, this work must follow the recommendation of Dr Parkin and include a Health Impact Assessment.	
7A-50	Summary of ISH2	Draft DCO	<p>The current dDCO definition of maintain is vague and permits the Applicant to conduct work that has not been assessed in their ES:</p> <p><i>“maintain” includes inspect, repair, adjust, alter, remove, refurbish, reconstruct, replace and improve any part of but not remove, reconstruct or replace the whole of, the authorised development and “maintenance” and “maintaining” are to be construed accordingly;</i>”</p> <p>The Applicant has claimed a solar PV panel failure rate of 0.4% per annum, which means that 24% will fail and need replacing over the 60-year life of the scheme and potentially 60% of the panels will last 100 years. The Applicant has not presented any evidence for this low failure rate and anticipated life of the panels. Additional to the physical failure rate, this takes no account of the energy generating capability of solar PV panels which typically degrade by 1% per annum. Taking this latter point into account, after 60 years the remaining panels will only be producing 40% of their initial output.</p>	<p>As noted in the Applicant's response to agenda item 5 in <b>Written Summary of the Applicant's Oral Submissions &amp; Responses at Issue Specific Hearing 2 [REP4-067]</b>, the definition of maintain is proportionate and consistent with the assessment undertaken in the Environmental Statement ([<b>APP-038 to APP-061, REP1-012 and REP3-010</b>]). The Applicant notes that it is the same definition used in the Longfield Solar Farm Order 2023, the most recent solar DCO granted by the Secretary of State.</p> <p>The Applicant has responded to the PV panel failure rate and panel degradation at 7A-35 above in this document.</p> <p>The Applicant has addressed the replacement of the BESS at items WLDC-18 and WLDC-22 above in this document.</p> <p>As noted in the Applicant's response to agenda item 3b in <b>Written Summary of the Applicant's Oral Submissions &amp; Responses at Issue Specific Hearing 2 [REP4-067]</b>, the Applicant confirmed that Chapter 2 of the ES [<b>APP-040</b>] sets out the Rochdale</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>Current industry evidence suggests that an economic life of a solar PV panel is 20 years, which takes into account the failure rate, degradation in energy generation and new technology becoming available. Using this reasonable worst-case assumption, the solar PV panels would be replaced twice (at 20 years and 40 years) during the life of the scheme. The current definition of "maintain" in the DCO would permit this and yet the Applicant's Chapter 7 takes no account of replacing the solar panels, except for when they fail. The Applicant's Review of Likely Significant Effects at 60 Years (EX1/WBB 2.3) states that extending the life of the scheme from 40 to 60 years will have no additional impacts, i.e. there is no intention to replace the panels on economic grounds, merely failed units.</p> <p>Either the Applicant will replace the solar PV panels, based on their economic life, to maintain the energy generation of the scheme, or they will only replace panels that have failed. In the former case, the current Chapter 7 and Review of Likely Significant Effects at 60 Years are incorrect and misleading. In the latter case, the total energy generation of the scheme over its life is much less than claimed and so the Applicant's Chapter 7.8.61 claiming "<i>a total energy generation figure of around 21,956,988 MWh over the estimated 40-year assessed lifetime</i>" is incorrect and misleading. A similar</p>	<p>Envelope approach and how the Applicant has complied with PINS Advice Note 9. The assessment is a reasonable worst case assessed based on information available, and foreseeable circumstances, rather than the absolute worst case that is theoretically possible.</p> <p>Article 5(1) of the <b>WB3.1_F Draft Development Consent Order Revision F [EN010132/EX5/WB3.1_F]</b> permits the Applicant to maintain the 'authorised development' Article 5(3) does not permit the carrying out of works that are likely to give rise to any materially new or materially different effects that have not been assessed in the environmental statement.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>comment can be applied to the batteries used in the BESS, where they will need replacing more frequently than stated.</p> <p>At present, the Applicant's submissions do not comply with the requirements of a Rochdale Envelope. Advice Notice Nine paragraph 1.4 requires consistency across the application documents. The dDCO's definition of "maintain" allows the Applicant to replace key components on a frequent cycle, maintaining their claimed electrical generating capacity, whilst their ES takes no account of maintaining the generating capacity by replacing units on economic grounds. Furthermore, the Applicant has not applied a reasonable worst-case approach when assessing the environmental impact and has not applied a realistic solar panel failure rate.</p>	
7A-51	Summary of ISH2	Draft DCO	<p>In the opinion of 7000 Acres, the definition of "maintain" in the dDCO should be more precise and state what activities the Applicant/Operator may conduct based on commercial grounds, rather than just replacing or repairing a device following a total failure.</p> <p>The following amended dDCO text is proposed:</p> <p>Definition of Maintain</p>	<p>The Applicant does not agree with the suggested amendments to the definition of 'maintain.' The Applicant considers the current definition of 'maintain' in the <b>WB3.1_F Draft Development Consent Order Revision F [EN010132/EX5/WB3.1_F]</b> is appropriate for the reasons outlined in its response to 7A-50 above in this document.</p> <p>The proposed insertion at Article 5(3) is not necessary as the term "environmental statement" is defined and</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>"maintain" includes inspect, repair, adjust, alter, remove, refurbish, reconstruct, replace and improve any component following a failure but not remove, reconstruct or replace the whole of, the authorised development, at one time or sequentially, and "maintenance" and "maintaining" are to be construed accordingly;</p> <p>Power to maintain an authorised development</p> <p>5.—(1) The undertaker may at any time maintain the authorised development.</p> <p>(2) This article only authorises the carrying out of maintenance works within the Order limits.</p> <p>(3) This article does not authorise the carrying out of any works which are likely to give rise to any materially new or materially different effects, including the assessment of Greenhouse Gas Emissions, transport, and noise, that have not been assessed in the environmental statement</p>	<p>includes the chapters assessing effects relating to greenhouse gas emissions, transport and noise.</p>

## 2.3 Submissions by Parish Councils and Statutory Bodies

### Broxholme Parish Meeting Solar Working Group [REP4-093]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
BPM-01	The Scheme	Site Selection	<p>The applicant has failed to provide a compelling argument to support the inclusion of WB1 M1 land parcel at Broxholme. Inclusion of field M1 results in Broxholme residents having to pass "Through" the solar site as opposed to passing "Around "the site.</p> <p>This is an important distinction for residents. We respectfully disagree with IGP justification for the inclusion of M1. The grazing argument is discredited (e.g. damage by compaction of soil along array channels by animal movement/ destroying biodiversity by grazing, methane and CO2 emissions etc. If IGP are arguing that agricultural use is maintained by grazing, then may we see the plan for the grazing of livestock at West Burton Solar and its related economic viability? 85% of M1 is BMV grade 3a. It is an outlier from the main site and is separated by a lane called Main Street. IGP have not provided a compelling argument for its inclusion - Option agreement??? Please expand on this reasoning. As stated previously this is a blatant land grab and should be removed from the application. In addition, removal of M1 will greatly reduce any visual impact upon the Public Footpath which runs in proximity to the site.</p>	<p>The Applicant refers to their previous responses to Broxholme Parish Meeting at BPM-01 to BPM-18 (pg.323-349) in <b>8.1.2 The Applicants Responses to Relevant Representations [REP1-050]</b>.</p> <p>In relation to field M1, please refer to Table 5.9 in <b>ES Chapter 5: Alternatives and Design Evolution [APP-043]</b> for the reason for including this field within the Scheme.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
BPM-02	Cultural Heritage	Archaeology Survey	<p>Broxholme Church Lane was used by developers IGP/CFA W/C 26<sup>th</sup> September 2022 for the Archaeology survey.</p> <p>Disregard for Broxholme residents:</p> <ul style="list-style-type: none"> <li>• Residents adjacent to Church Lane had concerns about IGP/CFA contractors using Church Lane for site access to WB1. The BPM and residents had not been given prior notification of this activity. Church Lane maintenance is privately funded by residents and any wear and tear by non-residential traffic is discouraged.</li> <li>• Several requests to CFA and IGP for the landowners Northern Site Access to be used instead during the survey week were ignored – an apology that was received after completion was considered too little too late and disingenuous!</li> <li>• This is evidence of not engaging with Broxholme community within acceptable time frames and causing material disturbance to residents and erosion on Church Lane without having remedial actions in place.</li> <li>• The site office and parking were located opposite The Old Rectory private residence. We suspect that the location was used for security reasons to mitigate theft and there is a high probability that it will be used again – this must be prevented as this residential area should not be disturbed by contractor activity.</li> </ul>	<p>The Applicant acknowledges that in October 2022 there was a request from a resident of Broxholme for Church Lane to not be used as an access route for West Burton 1. Following this request, alternative routes were used to access the site.</p> <p>As shown in Figure 5.1 of the <b>Construction Traffic Management Plan [REP4-038]</b>, all construction traffic will be routed south of the A1500 and will leave the highway at a construction access located to the north of Broxholme.</p> <p>The construction compound (Works No 7A) for West Burton 1 is now located to the east of the construction access point, approximately 400m from the residential dwellings of Broxholme. This is shown on Sheet 2 of the Works Plan <b>[EN010132/EX5/WB2.3_E]</b>.</p>



Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			Residents are justifiably concerned that this arrogant behaviour is just the beginning and will continue if the DCO is granted and politely request that IGP and their contractor justify why they acted in this way? (Photographs available of contractor activity during this survey week)	
BPM-03	Transport and Access	WB1	<p>The access to WB1 has been identified as problematic and unsuitable for large site traffic. BPM is concerned and alarmed at new proposals to "force" access along this route. Would IGP explain in detail exactly what their intentions are in respect to these proposed access applications and why they are necessary? How will this impact on residents?</p> <p>The plan/map legend contains the terms...</p> <ul style="list-style-type: none"> <li>• Freehold to be compulsory acquired?</li> <li>• Extinguish easements, servitudes, and other private rights?</li> <li>• New Rights (including restrictions) to be compulsory acquired? This language is intimidating and alarming!</li> </ul> <p>To conclude: BPM supports the opposing arguments to the WB DCO Application provided by the 7000 Acres Group, WLDC, LCC and other Interested Parties.</p>	<p>Access arrangement to WB1 from the A1500 along Main Street, including provision of passing places for HGVs, and temporary carriageway widening for an Abnormal Indivisible Load have been agreed with Lincolnshire County Council. This will be set out in the Statement of Common Ground with LCC, which will be submitted to the examination at the next suitable opportunity.</p> <p>Additional details are set out in paragraph 8.8 and Appendix G of the <b>6.3.14.1_A ES Appendix 14.1 Transport Assessment [REP4-036]</b></p> <p>The Applicant assumes that the IP is referring to the <b>Land Plan [REP4-006]</b>. The plans need to be read in conjunction with the <b>Book of Reference [REP4-032]</b> and draft DCO to establish the extent of compulsory acquisition powers being sought. Where rights of access are being sought, this includes the ability to alter or improve the access. Further details can</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				be found in Appendix A to the <b>Statement of Reasons [REP4-028]</b> .

Canals and River Trust [REP4-094]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
CRT-01	Draft DCO	Schedules	We welcome the inclusion of the protective provisions for the Trust in Part 13 of Schedule 16 and, as stated previously, the amendment to article 6(1)(i) to ensure the disapplication of legislation listed in Schedule 3 does not impact on the operation or maintenance of the River Trent as a navigable river. These reflect the provisions included in the draft DCOs for Gate Burton and Cottam projects. This wording is agreed by the Trust subject to any changes to the draft DCO or changes to the project which would impact the Trust.	The Applicant notes this comment.
CRT-02	The Scheme	Cable Route Corridor	The report considers the cable route options to the south of Marton village and east of the River Trent. In our Relevant Representation we advised that we own a dredging tip on the east side of the River Trent, which initially lay immediately north of the cable route corridor. The below extract is taken from the Environmental Constraints Plan Figure 3-1 and shows the current red line site area excluding the eastern dredging tip. The dredging tip is not mentioned as a constraint on the Environmental Constraints Figure 1a.	The dredging tip being referenced is not located within the Order Limits as shown in <b>WB2.1_B Location Plan [REP4-004]</b> and the Applicant has not made any changes to the Order Limits in this location.
CRT-03	Draft DCO	Protective Provisions	Option 2 (if the order limits are altered) does include land in the southeast corner of the eastern dredging tip. The inclusion of this land within order limits raises the potential need for Protective Provisions for the Trust and	The dredging tip being referenced is not located within the Order Limits as shown in <b>WB2.1_B Location Plan [REP4-004]</b> and the Applicant has not made any changes to the

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			a Land Agreement if the route is altered. This is a similar situation to that is proposed for the southwest corner of the western dredging tip as part of the West Burton Solar Project. The same would be the case for options 3, 4 and 5 which also appear to include land in the southeast corner of the eastern dredging tip, but do not appear to be the preferred options. We would wish to work with the applicant (and applicants for the interrelated projects) to ensure this matter is discussed and included within future amendments. We have already provided these observations to them	Order Limits in this location. The Applicant notes that the options being referred to are alternative options being considered for the land belonging to Nick Hill. However, the report concluded that the existing route within the Order Limits was the preferred option.  The voluntary property agreement, for the cable to pass through Canal and River Trust land, continues to be under negotiation.
CRT-03	The Scheme	Concept Design Parameters	We welcome that the updated at Deadline 3 version of this document includes the <i>wording The HDD depth will be a maximum of 25m below the bottom of the riverbed and a minimum of 5m below the lowest surveyed point of the River Trent riverbed in order to prevent risk of any scour exposing cable</i> as previously agreed with the applicant.	The Applicant notes this comment.
CRT-04	Cumulative Impact	Joint Interrelationship Report	As previously mentioned, we note that on page 47 of the Joint Report on Interrelationships between Nationally Significant Infrastructure Projects the entry on the date 10/08/23 mentions Canal. We believe this may be a typing error the applicants and EDF regarding Cottam substation.	This typing error was corrected in the most recent version of <b>WB8.1.9_C Joint Report on Interrelationships between Nationally Significant Infrastructure Projects – Revision C [REP4-059]</b> submitted at Deadline 4.

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
CRT-05	Draft DCO	Cable Route Corridor	The parties continue to negotiate the agreement for the rights required for the project in respect of the cable route beneath the Trust's dredging tip (parcel 07-121). We are confident agreement will be reached prior to the end of the Examination.	The Applicant notes this comment and will continue to work constructively with the Canal and River Trust to achieve this.

Marton & Gate Burton Parish Council [REP4-095]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
MGBPC-01	Principle of Development Soils and Agriculture Landscape and Visual Impact	Use of arable land for solar	I represent the parishioners of Marton and Gate Burton as Chair of the parish council. We have concerns over the large concentrations of solar panels proposed for this area. A large percentage of the arable land in both parishes will be covered in these devices. This will take good productive agricultural land out of use and visually blight most of the vicinity.	The Applicant refers to their previous responses to Marton & Gate Burton Parish Council at MGBPC-01 to MGBPC-03 (pg.399-402), and to matters on visual impact at LAN-04 (pg. 639-641) in <b>8.1.2 The Applicants Responses to Relevant Representations [REP1-050]</b> .
MGBPC-02	Principle of Development Alternatives and Design Evolution	Cable routing	The narrow corridor of land between these solar developments will be excavated to bury the cables carrying the power to the Cottam PowerStation connecting point. All four of these proposed large solar parks have chosen virtually the same route to Cottam and they would all like to cross the river Trent at the same point. This is where there are already two high voltage overhead power lines, a large diameter gas pipeline and a major drainage channel.	The Applicant refers to their previous responses to the Canal & River Trust at CRT-04 (pg.212) in <b>8.1.2 The Applicants Responses to Relevant Representations [REP1-050]</b> .
MGBPC-03	Hydrology, Flood Risk and Drainage	Impact on flood defences	At this point there is a large flood defence embankment. This bank is not situated here to protect Marton or Gate Burton which have never flooded at least since Roman times. These defences prevent floodwater running down the drainage ditches and ultimately ending up in the Brayford Pool in the centre of Lincoln causing major flood damage.	The Applicant refers to their previous responses to Emma Hill at EH-04 (pg.506-507) in <b>8.1.2 The Applicants Responses to Relevant Representations [REP1-050]</b> .

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
MGBPC-04	Soils and Agriculture Ecology and Biodiversity Hydrology, Flood Risk and Drainage	Construction impacts	Laying these cables with the necessary heavy machinery required will ruin the productive land, decimate the wildlife and compromise the flood defences on the river Trent. The river authorities are also concerned about these proposals and have expressed their reservations. (see enclosed letter)	<p>The Applicant refers to their previous responses to Emma Hill at EH-04 (pg.506-507) in <b>8.1.2 The Applicants Responses to Relevant Representations [REP1-050]</b>.</p> <p>The enclosed letter to the Written Representation made is that of the Canal &amp; River Trust letter to Applicants 4<sup>th</sup> May 2023 – submitted as part of rep [RR-033]. As such, the Applicant has responded to the CRT's matters at CRT-01 to CRT-14 (pg.209-225) in <b>8.1.2 The Applicants Responses to Relevant Representations [REP1-050]</b>. The Applicant has also communicated and responded to subsequent representation made by the Canal &amp; River Trust in:</p> <ul style="list-style-type: none"> <li>• CRT-01 to CRT-02 (pg.25) in <b>8.1.10 The Applicant's Responses to Additional Submissions [REP1-044]</b></li> <li>• Section 3.1 and 3.2 (pg.130-142) in <b>WB8.1.17 Response to Written Representations at Deadline 1 Part 1 [REP3-034]</b></li> <li>• CRT-01 to CRT-05 (pg.214-216) in <b>WB8.1.23 The Applicant's Response to Deadline 2 and 3 Submissions [REP4-066]</b>.</li> </ul>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
MGBPC-05	Principle of Development  Major Accidents and Disasters	BESS safety and fire	The parish council is also alarmed at the idea of installing large battery storage systems in both parishes. The regulatory bodies do not seem to have any plan how to extinguish fires or control associated potential hazards. What risk assessments have been made?	The Applicant refers to their previous responses in relation to BESS fire safety at 7A-108 to 7A-111 (pg.52-61) in <b>WB8.1.18 Response to Written Representations at Deadline 1 Part 2 [REP3-035]</b> .  Please also refer to agenda item 4c, BESS Management and Safety, in Written Summary of the Applicant's Oral Submissions at Issue Specific Hearing 3 and Responses to Action Points <b>[REP4-070]</b> .
MGBPC-06	Principle of Development  Soils and Agriculture	Use of arable land for solar	We consider these proposed developments are a waste of productive arable land.	The Applicant refers to their previous responses to Marton & Gate Burton Parish Council at MGBPC-02 to MGBPC-03 (pg.400-402) in <b>8.1.2 The Applicants Responses to Relevant Representations [REP1-050]</b> .
MGBPC-07	Alternatives and Design Evolution	Alternative locations for solar	There are other derelict and brownfield sites available, along with millions of domestic and industrial roofs that could accommodate them.	The Applicant refers to their previous responses in relation to alternatives sites for solar installation at ALT-01 (pg.8-9) in <b>WB8.1.19 Response to Written Representations at Deadline 1 Part 3 [REP3-036]</b> .



Fillingham Parish Meeting [REP4-096 and REP4-097]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
FPM-01	Cumulative Development	Aerial Flyover	Having been made aware of the Aerial Flyover Footage (EN010133 REP4-104), showing an indication of the combined effect of 4 NSIP solar projects within our region, I am writing to express the two key points on behalf of Fillingham Parish Meeting:	The Applicant notes this comment and confirms an aerial flyover for the Scheme has been submitted [REP4-098].
FPM-02	Cumulative Development Landscape and Visual Impact	Cumulative impact on landscape character	Firstly, words cannot properly express the emotion of having watched what this video represents, but it is shocking and upsetting to say the least. It is impossible to consider how development at this scale will do anything other than utterly transform the character and decimate the appeal of this region.	The Applicant refers to their previous responses in relation to cumulative impact on landscape character in <b>WB8.1.19 The Applicant's Responses to ExA First Written Questions at Deadline 3 [REP3-038]</b> .
FPM-03	General	Consultation information	Secondly, it is a clear failure of the consultation that this information has not been adequately presented to the public before now, which is already after the Gate Burton examination has concluded, and in the very late stages of the Cottam and West Burton examinations. How can it be that such information was not made widely and promptly available to the public?	The Applicant respectfully disagrees with this statement.  Although presented in a new format, using Google Earth satellite imagery rather than OS base mapping, the information provided in this video covers the same scope as that presented in <b>6.4.2.1 Environmental Statement - Figure 2.1 - Cumulative Assessment Site Plan [APP-140]</b> , which was submitted as part of the original DCO application in March 2023.
FPM-04	General Principle of Development	Principle of solar on arable land	Picture this, it's a fine day, Martin Clunes is smiling out at you and he's going to discover the truth behind solar farms, get rid of those 'myths and misconceptions.' He's going to show us that, standing with a farmer, in a	The Applicant has provided a response on rooftop solar as part of its response to ExA's FWQ 1.1.1, 1.1.20, 1.9.1, and 1.9.8 in <b>WB8.1.21</b>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
	Energy Need		<p>beekeeper suit and in a small field with 2m tall solar panels, solar has benefits for the farmer, benefits for biodiversity and will not be invasive, imposed on communities and will provide the electricity that the country needs...</p> <p>Well, this is what Island Green would like to present, because they have commissioned the video. Now picture this, not just a few acres across different farms in different areas, benefiting a local farmer who is still farming alongside but concentrated over 10's of thousands of acres in one district, with 4.5 m high panels, here there will no longer be agricultural farming alongside, there won't be the land left. Where will the biofuels be grown? Where will crops be grown for us to eat or animal feed? The benefits are limited to a few, who may not even actually be farmers on the ground.</p> <p>Now consider this...the change to the National policy Statements on renewable energy November 2023, which puts solar as a critical national priority well, who were the lobbyists behind this? Well, strangely they are sat here now... they represent the companies behind these solar projects, they have put millions into persuading us and government that ground solar industrialization is the way to give us energy. That's because they make money, it's relatively easy to construct solar, of course not here in the UK, they won't create any long-term jobs for the region, they will change the landscape for 40-60 years, a lifetime or is that more than a lifetime? They will</p>	<p><b>Applicant Response to ExA First Written Questions [REP3-038].</b></p> <p>The Applicant has consistently agreed that rooftop solar can make a contribution to decarbonisation but the critical point made in <b>7.11 Statement of Need [APP-320]</b> (which includes reference to Government's position e.g. at Para 3.3.11 with which it agrees), is that rooftop solar alone will not deliver the amount of solar capacity needed to deliver a decarbonised electricity system by 2035. Therefore the deployment of rooftop solar is not an alternative to the Scheme and does not diminish the need for the Scheme.</p> <p>The British Energy Security Strategy (2022) set an ambition for 70GW of solar in the UK by 2035, an ambition which was confirmed in Powering Up Britain (Energy Security Plan) which on p35 states: "we are aiming for 70 gigawatts of ground and rooftop capacity together by 2035. This amounts to a fivefold increase on current installed capacity. We need to maximise deployment of both types of solar to achieve our overall target" the subsequent two paragraphs explain the benefits of each type of solar installation (rooftop, and ground mount) and concludes by considering that</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>cause disruption in the building, won't provide the actual solar the companies imagine, and what actual guarantees are there at the end of its lifetime? But that's ok because these companies will have discussions between their topic leads, they will use their professional judgments... is that not like marking your own homework as a child? Is that not the same as lobbying to ensure that government policy reflects your priority?</p> <p>Martin Clunes asks 'why isn't everyone doing it' (solar) well because, it is not the answer the country needs, here is not the right place to put a concentrated area of large ground mounted solar panels, the place for solar is on roofs, in small areas where the local's benefit, as part of a family of renewables. Did anyone tell Martin Clunes he had half a story? Like we are presented with part truths, and complicated arguments, that don't add up.</p> <p>Whilst these companies lobby and belittle us on social media, they are not actually doing this for green reasons, they aren't providing sustainable power for the future, they are overplanting, they are tying up grid connections, they are racing to be the company that is allowed to put forward a proposal that is granted, they are here to take the contracts for difference.</p> <p>We are an island and land is precious, we need to consider carefully its use before we act, land needs to</p>	<p>"there is a strong need for increased solar deployment".</p> <p>The Applicant strongly rejects any claim that they belittled the local community. Discussions between the solar industry and government ministers do take place, but this is the case for all types of renewable and non-renewable energy generation technologies.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>do so much more than solar to rectify our damage that humans have done to the land and the climate.</p> <p>And when these companies are long gone, for they will sell on and evolve, move to the next big project, and when their legacy is debated in years to come, when solar should have been placed on roof tops as a policy before we were in crisis, when there is no one left accountable for their actions... what will our legacy be? How will we justify this to our grandchildren and great grandchildren... I personally can say I tried to protect agriculture, a way of life, my community, I tried to protect wildlife and habitats. I put solar panels on my roof... but will that have been enough? Well, I am trying... will others?</p>	

Marine Management Organisation [REP4-100]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
MMO-01	General	Questions or responses to previous submissions	The MMO has received no questions or comments regarding submissions made in Deadline 3 and in turn have no comments to provide for Deadline 4. No further information has been requested by the Examining Authority from the MMO for this deadline. We will provide a response in due time if any is required from the MMO.	The Applicant notes this comment. Please refer to the Applicant's response to the Examining Authority's Second Written Question 2.4.11 [EX5/WB8.1.34].

Office of Rail and Road [REP4-101]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
ORR-01	General	Involvement in Examination	The Office of Rail and Road (ORR) has no comment on this scheme as the correct body, Network Rail has been consulted and is engaging with yourselves.	The Applicant notes this comment and confirms it is continuing to engage with Network Rail. Please refer to the Applicant's response to the Examining Authority's Second Written Questions 2.4.12 and 2.5.18 [EX5/WB8.1.34].

## 2.4 Submissions by Affected Persons, Interested Parties and other Members of the Public

Adam Sissons [REP4-102]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
ASi-01	General	Dissemination of information	<p>Local group 7000 Acres are doing an excellent job of keeping us informed about the proposals and the examination process, which is hugely time consuming to be involved in and with four proposals in this area running concurrently, it is extremely confusing and bombarding with the amount of documents to view and refer to. I would not be able to keep track of all the deadlines for the four projects if it was not for their regular emails and updates. 7000 Acres have brought this aerial footage of Cottam, Gate Burton, West Burton, and Tillbridge to my attention.</p> <p><a href="https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010133/EN010133-001638-C8.2.12 Aerial Flyover Footage using Google Earth Data (Low Resolution).mp4">https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010133/EN010133-001638-C8.2.12 Aerial Flyover Footage using Google Earth Data (Low Resolution).mp4</a></p> <p>The impact this will have on our local communities is life changing, yet there are so many people I speak to who don't know the details behind these projects, which gives the developer a distinct advantage.</p>	The Applicant notes this comment and confirms a complementary aerial flyover for the Scheme has been submitted [REP4-098].
ASi-02	Soils and Agriculture	Use of arable land Food Security	This is a highly ineffective and inefficient use of our productive farmland and I strongly object to this project and the three other large scale projects planned for the area, totalling approximately 10,000 acres. Since Brexit and Covid we should have learned lessons of the importance of food security. We still seem to be	The Applicant refers to their previous responses in relation to food security at LCC-21 (pg.16) in <b>WB8.1.17 Response to Written Representations at Deadline 1 Part 1 [REP3-034]</b> and SOI-01 (pg.703-706) in <b>8.1.2 The</b>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			struggling to fill the shelves in supermarkets at times. The amount of land proposed for this project is vast, literally stretching from one village to the next.	<b>Applicants Responses to Relevant Representations [REP1-050].</b>
ASi-03	Landscape and Visual Impact	Visual impact to residential properties	This project engulfs some houses and the visual impact will be enormous.	The Applicant refers to their previous responses in relation to visual effects on residential properties in Question LAN-02 <b>WB8.1.19 Applicant's Response to Written Representations and Other Submissions at Deadline 1 [REP3-036]</b> and in Questions 1.8.1, 1.8.11, 1.8.15 and 1.8.21 <b>WB1.8.21 Applicant's Response to ExA First Written Questions at Deadline 3 [REP3-038].</b>
ASi-04	Landscape and Visual Impact  Ecology and Biodiversity	Impacts on, and planting of hedgerow	There are promises to plant new hedgerows, which will take years to grow, but this will not block out thousands of acres of glass, you will be able to see this from all angles. And the destruction of older established hedgerows is shocking to me. Hedgerows are also a crucial feature of our countryside. They provide vital resources for wildlife. They connect populations that would otherwise be isolated and vulnerable. The government is supporting hedgerows in the UK <a href="https://defrafarming.blog.gov.uk/2023/04/05/how-were-supporting-hedgerow-planting/">https://defrafarming.blog.gov.uk/2023/04/05/how-were-supporting-hedgerow-planting/</a> and has announced a target to create or restore 30,000 miles of hedgerows by 2037, and 45,000-miles of hedgerows by 2050, under the new Environmental Improvement Plan 2023. The CPRE is also fully in support of this.	The Applicant refers to their previous responses in relation to removal of hedgerows for construction works at WLDC-32 (pg.58) in <b>WB8.1.17 Response to Written Representations at Deadline 1 Part 1 [REP3-034].</b>



Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<a href="https://www.cpre.org.uk/news/huge-campaign-win-as-government-sets-hedgerow-targets/">https://www.cpre.org.uk/news/huge-campaign-win-as-government-sets-hedgerow-targets/</a>	
ASi-05	Energy Need	Achieving net zero	Solar is fully dependent on weather and light and at night time they become redundant. A solar farm in winter can only work on potential daylight for an average of 8 hours. My feeling is that the government's attempt to achieve net zero on our tiny island will make minimal difference to global climate change overall. There are bigger producers of CO2 who are not as committed to the goal of net zero and the ambitious timescale. Encouraging the use of electric vehicles puts further pressure on electricity supply and forces us down the route of renewable energy, playing into the hands of the solar developers who are only looking to make money from these schemes.	Chapter 4 of <b>WB7.1 Statement of Need [APP-320]</b> sets out the UK's legal requirement to decarbonise and explains how that requirement has developed an increased need and urgency to meet the UK's obligations under the Paris Agreement (2015). The chapter summarises the latest expert views on the urgency for and scale of low-carbon infrastructure needed to deliver the UK's Net Zero legal obligations, including the National Infrastructure Strategy [3] and the Climate Change Committee (CCC) Sixth Carbon Budget [4] and 2022 Progress Report to Parliament [115].  The Applicant has provided a response on the need for solar and its contribution towards net zero as part of its response to ExA's FWQ 1.9.8, and on the productivity of the solar farm in ExA FWQ 1.9.9 in <b>WB8.1.21 Applicant Response to ExA First Written Questions [REP3-038]</b> .
ASi-06	Alternatives and Design Evolution	Innovation energy infrastructure Alternative sites	I have seen far more innovative installations of solar panels. For example, the full length of motorway central reservations with a roof of solar panels covering a cycle path underneath, also canals having solar panels built over the top of them, reducing evaporation. Enlil	The Applicant refers to their previous responses in relation to alternative sites for solar installation at ALT-01 (pg.8-9) in <b>WB8.1.19 Response to Written Representations at Deadline 1 Part 3 [REP3-036]</b> .

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>turbines harvest the energy from the natural wind, as well as created by passing vehicles. The French government has passed a law which will require all car parks with more than 80 spaces to install solar canopies over at least half the area they cover. Some companies have already begun installing the canopies. The French energy company Engie has built a solar carport at a Stellantis factory in Sochaux in eastern France, which makes larger Peugeot models. With 64,000 solar panels over 22 hectares, it will supply around a third of the plant's electricity needs. Disneyland Paris is installing a 17MW solar carport over 17 hectares of its parking area. It will supply energy to the theme park. All using existing land and with dual purpose as they will also provide shade, rather than decimating more and more green space. Disused MOD sites could be used as these large sites are often abandoned with no plans for alternative use and already have public restrictions, fences, security in place with could be upgraded to suit.</p>	
ASi-07	Alternatives and Design Evolution	<p>Innovation energy infrastructure Alternative sites</p>	<p>Solar panels should be added to transportation such as cars, buses, lorries, trains so they effectively will power themselves meaning charging points would not need to be used as much and electric trains for example would take less power from the grid. All business with roof space such as warehouses, supermarkets, commercial retail parks and industrial trading estates should have solar panels enforced as part of the planning process. The government could put a law in place to make solar</p>	<p>The Applicant refers to their previous responses in relation to alternative sites for solar installation at ALT-01 (pg.8-9) in <b>WB8.1.19 Response to Written Representations at Deadline 1 Part 3 [REP3-036]</b>.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			on new builds mandatory. They could also provide help for homeowners to install solar panels as they do for new boilers and cavity wall insulation.	

Alison Wood [REP4-103]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
AWo-01	Cumulative Effects Soils and Agriculture	Cumulative impact on agricultural land	This is one of 9 Nationally Significant Infrastructure projects totalling 27,000 acres with 5 (13,000 acres) falling within a 10 km radius in our area. These solar schemes have been divided into multiple smaller applications but their likely impact must be considered together. All of these proposals will remove valuable existing agricultural land out of production. Existing policy grants an automatic presumption against approving such proposals on agricultural land graded 1, 2 or 3a. Land grade 3b is just as good for growing wheat and grain. This would be a prime example of bad planning and be foolish at a time when food distribution networks worldwide have faced ongoing disruption owing to the war in Ukraine. This would also have a huge and negative cumulative impact upon this part of the country	The Applicant refers to their previous responses in relation to food security at LCC-21 (pg.16) in <b>WB8.1.17 Response to Written Representations at Deadline 1 Part 1 [REP3-034]</b> and SOI-01 (pg.703-706) in <b>8.1.2 The Applicants Responses to Relevant Representations [REP1-050]</b> .
AWo-02	Principle of Development	Cumulative impacts in Lincolnshire Planning Balance	There are additionally at least 4 more to the south of this area. This will make Lincolnshire, currently one of the most rural and agricultural counties in the country, into an industrialised wasteland that nobody will want to visit, let alone actually live in. This would have a major impact upon local communities, tourism, economy, infrastructure, ecology and the environment and I ask that planning for this proposed development is denied on the grounds outlined above.	The Applicant refers to their previous responses in relation to planning balance at WLDC-18 (pg.42) and WLDC-66 (pg.83) in <b>WB8.1.17 Response to Written Representations at Deadline 1 Part 1 [REP3-034]</b>

Andy Johnson [REP4-104 and REP4-105]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
AJo-01	Telecomms, Utilities and Television Reception	Gas and fuel pipeline network	<p>It has been brought to my attention that there is a possibility of a network of pipework that run across the local area. Please click on links for detailed information and maps. Not sure if and how this would impact on the installation of panels and cabling but should be reviewed as not mentioned within submission. thanks.</p> <p><a href="https://en.wikipedia.org/wiki/Exolum_Pipeline_System">https://en.wikipedia.org/wiki/Exolum_Pipeline_System</a>  <a href="https://journals.sagepub.com/doi/10.1177/0020294013499112">https://journals.sagepub.com/doi/10.1177/0020294013499112</a></p>	<p>Gas and fuel pipelines within the Order Limits have been identified and mapped in the <b>WB7.15_B Crossing Schedule - Revision B [REP4-056]</b>. Offsets agreed with pipeline operators have been included in the Scheme design and are shown by the discontinuation of Works 1A(i, ii, iii), 1B(i, ii, iii), and 1C(i, ii, iii) on <b>WB2.3_D Works Plan - Revision D [ REP4-008]</b>.</p> <p>Measures to ensure underground utilities and infrastructure is protected from construction activities is set out in Table 3.14 of <b>WB7.1_C Outline Construction Environmental Management Plan - Revision C [REP4-042]</b>, which is secured by Requirement 13 of the draft DCO <b>[EX4/WB3.1_E]</b>.</p>
AJo-02	Hydrology, Flood Risk and Drainage	Existing and future flood risk	<p>Flooding in the proposed area In the past few weeks we have experienced extensive flooding in the area designated for the installation of solar panels. My concerns are regarding the management of the land as the land sits inside the River Trent flood basin. I understand that the land management will be made the responsibility of the land owner not the developer including flood risk and have a few questions based upon this. The installation of the panels naturally will cover a large percentage of the ground reducing the ability of the ground to</p>	<p>The Applicant acknowledges that some areas of the Scheme are within areas of elevated flood risk. The flood risk at the Sites and within the Cable Route Corridor has been assessed and is detailed within <b>6.3.10.1-6.3.10.6 Environmental Statement –Appendices 10.1-10.6 Flood Risk Assessment and Drainage Strategy Reports [APP-089 to APP-094]</b>. Embedded</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			act as a soak away therefore leading to an earlier saturation of the surrounding land leading to a heightened flood risk.	mitigation to ensure the Sites are at an acceptable risk of flooding is explained within section 10.7 of <b>6.2.10 Environmental Statement – Chapter 10 Hydrology Flood Risk and Drainage [APP-048]</b> .
AJo-03	Hydrology, Flood Risk and Drainage	Hydrological land management	1, Has the applicant provided a detailed document on how the land owner will provide land management in relation to the additional water displacement?	Details of the surface water drainage scheme must be in accordance with the Outline Drainage Strategy <b>[APP-089]</b> and be approved by the relevant planning authority. This is secured through Schedule 2 Requirement 11 of the Draft Development Consent Order Revision E <b>[EN010132/EX5/WB3.1_F]</b> .
AJo-04	Hydrology, Flood Risk and Drainage Draft DCO	Hydrological land management	2, What guarantees are being provide by the land owner(s) to ensure land flood management and compliance over the planning permission period?	Details of the surface water drainage scheme must be in accordance with the Outline Drainage Strategy <b>[APP-089]</b> . A detailed landscape and ecological management plan must be prepared in accordance with the Outline Landscape and Ecological Management Plan <b>[REP4-044]</b> . These documents must be approved by the relevant planning authority and are secured through Schedule 2 Requirements 7 and 11 of the Draft Development Consent Order Revision E <b>[EN010132/EX5/WB3.1_F]</b> .
AJo-05	Hydrology, Flood Risk	Flood risk mitigation	3, What work will be required to mitigate flooding risks prior to the panel installation and is there a detailed plan of works /	The <b>Outline Construction Environmental Management Plan- Revision C (Clean)</b>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
	and Drainage		maintenance to cover this? Has this been accepted by the relevant authorities?	[REP4-042] includes measures for flood risk and surface water management during the construction stages, which is secured by Requirement 13 of the draft DCO [EX5/WB3.1_F].
AJo-06	Hydrology, Flood Risk and Drainage	Agreement with statutory bodies for flood risk and drainage	4, What are the relevant authority's thoughts on the additional flood risk management via the land owner?	The Applicant notes this comment is directed at the Lead Local Flood Authorities and the Environment Agency, with which the Applicant is in discussions to agree Statements of Common Ground for submission to the ExA.
AJo-07	Hydrology, Flood Risk and Drainage	Flood risk liability	<p>5, Flooding liability – flooding has been viewed as a natural event with no one being directly accountable. However where changes to land away from nature-based activities may now be accountable and liable for damages caused. What insurance cover will be provided to compensate any affected properties and land?</p> <p>I am also disappointed that the appicate made no comment on the direct questions asked (by the first 3 speakers) and was more interested in the chastise of some of speakers - very unprofessional and condescending</p>	<p>The proposed solar schemes will not contribute to an exacerbation of flooding in the area and therefore there is no increased liability to neighbouring land and no compensation required.</p> <p>The embedded mitigation detailed in section 10.7 of <b>6.2.10 ES Chapter 10 Hydrology, Flood Risk and Drainage [APP-048]</b> will ensure there is no loss of flood storage as a result of the development and that the existing surface water run-off regime will be mimicked.</p> <p>There is no UK environmental national guidance with regards to runoff from solar panel installations.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				<p>However, research undertaken in the United States (US) by Cook and McCuen considers the points raised in this comment and states within their conclusions that; 'The addition of solar panels over a grassy field does not have much of an effect on the volume of runoff, the peak discharge, nor the time to peak. With each analysis, the runoff volume increased slightly but not enough to require storm-water management facilities', and continue to recommend that the vegetation cover beneath the panels is well maintained or that a buffer strip be placed after the most down gradient row of panels.</p> <p>Point 3 of paragraph 10.8.1 within <b>6.2.10 ES Chapter 10 Hydrology, Flood Risk and Drainage [APP 048]</b> includes provision for suitable planting (such as a wildflower or grass mix) to ensure that the underlying ground cover is strengthened and is therefore unlikely to generate surface water runoff rates beyond the baseline scenario.</p> <p>The proposed drainage strategy is detailed within Section 5.0 of <b>6.3.10.1 ES Appendix 10.1 Flood Risk Assessment and Drainage Strategy Report [APP-089]</b>.</p>



Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				<p>Section 5.0 'Drainage Strategy' of <b>6.3.10.1 ES Appendix 10.1 Flood Risk Assessment and Drainage Strategy Report [APP-089]</b> assesses that the panelled areas will not alter the existing surface water run-off regime and will therefore not be formally drained. Areas of increased hardstanding such as smaller areas of hardstanding formed as footings for electrical infrastructure will utilise SuDS principles and attempt to mimic the existing surface water run-off regime as existing.</p> <p>The substation and BESS area within the Scheme is considered within an area specific drainage strategy included within Section 3.0 of <b>6.3.10.5 Environmental Statement - Appendix 10.5 FRA DS West Burton 3 [APP-093]</b>.</p> <p>The drainage strategy and detailed drainage design will be developed during the detailed design process.</p> <p>As secured by Requirement 11 in Schedule 2 of the <b>3.1_F Draft Development Consent Order Revision F [EN010132/EX5/WB3.1_F]</b> "No part of the authorised development may commence until written details of the surface water drainage scheme and (if any)</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				foul water drainage system for that part have been submitted to and approved by the relevant planning authority."
AJo-08	Hydrology, Flood Risk and Drainage	Existing flood events	Photos of flooding west of Gainsborough.	The Applicant notes that the photos featured are of the A631 Flood Road between Gainsborough and Beckingham, and neighbouring Saundby Marsh approx. 10km north (downstream on the River Trent) of Torksey and within Flood Zone 3. As shown in Figures 6.1, 6.2, 6.3 and 6.4 of WB6.3.14.1_C ES Appendix 14.1: Transport Assessment [REP4-036], no construction traffic will use the A631 Flood Road.

Christine Warren [REP4-106 and REP4-107]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
CWa-01	General	Existing conditions	Annotated photos from around residence and plans from Sturton le Steeple Quarry planning application, and Works Plan from Scheme	The Applicant notes this submission.
CWa-02	Compulsory Acquisition	Extent of compulsory acquisition matters	The first day was on compulsory purchase it was deemed I was not to be purchased due to my home not having any impact on my home. It does however have an impact on my life but this was not taken into consideration	<p>The Applicant notes that the IP attended the compulsory acquisition hearing which is specifically held to consider concerns raised by Affected Persons.</p> <p>The Applicant does not consider the IP to be an Affected Person (as defined in the Planning Act 2008).</p> <p>However, the Applicant refers to the Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 4 and Responses to Action Points [REP4-071] (which the IP also attended) where potential impacts such as noise and transport on the IP were discussed.</p>
CWa-03	Energy Need Climate Change	Energy production	.4 % of the solar panels will not work and a % will be inefficient . I asked are the statistics given out by what can be produced based on these failure rates? No answer	It has been assumed in the GHG calculations that there will be a 0.4% reduction in efficiency of panels over the lifespan of the project. The calculation for a 60 year timeframe compared to 40 years would be 31,425,614 MWh compared to 21,956,988 MWh, as stated

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				in the Applicant's response to the ExA's First Written Question 1.9.11 [REP3-038].
CWa-04	Major Accidents and Disasters  Air Quality	BESS pollution and fire safety	The battery packs omit gas and have a problem with fire protection. I asked what the research was used to give the information of the battery packs? None produced.	BESS battery systems do not omit gas during operations. <b>WB7.9_A Outline Battery Storage Safety Management Plan Revision A [REP3-032]</b> , which is secured by Requirement 6 of the draft DCO [EX4/WB3.1_E], specifies the minimum range of standards, certifications and testing that the BESS system must comply with. The OBSSMP also defines the range of thermal runaway hazard prevention and mitigation solutions that will be utilised to minimise fire, explosion or toxic gas emissions.  Please also refer to agenda item 4c, BESS Management and Safety, in Written Summary of the Applicant's Oral Submissions at Issue Specific Hearing 3 and Responses to Action Points [REP4-070].
CWa-05	Climate Change	Embodied carbon	The Solar panel are being transported from China and Europe. why are we not making our own? Does it not have an impact on the carbon footprint bringing them from the other side of the world? I have recently found out Glass and aluminium have	The Climate Change assessment [REP1-012] has considered emissions generated by transport of materials from Europe and China. The conclusion of the chapter is that these emissions and other

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			the biggest impact on the Carbon footprint. Why not look for an alternative?	embodied carbon from construction of the development would be offset by the carbon savings from operation of the development compared to non-renewable sources.
CWa-06	Waste	End of life batteries	What will happen to the batteries once they have been run out of use?	The Applicant refers to their previous responses in relation to disposal of batteries at WAS-01 (pg.722-725) in <b>8.1.2 The Applicants Responses to Relevant Representations [REP1-050]</b> .
CWa-07	Transport and Access	Cumulative traffic levels	The amount of traffic you generate will add with our villages just adds to further projects in the area? What will be done about this and are they taken in to consideration?	Measure 'xxv' in Section 7 of the <b>outline Construction Traffic Management Plan (oCTMP) Revision D</b> , which is secured by Requirement 15 to the draft DCO [EX4/WB3.1_E],[REP4-038] states, <i>"In the event that the construction schedules associated with this Scheme and other schemes in the area overlap (being the Cottam Solar Project, the Gate Burton Solar Project, and the Tillbridge Solar Project), a joint Construction Traffic Management Plan (joint CTMP) could be produced. Other schemes that come forward in the area could be included as appropriate. The Joint CTMP would set out construction traffic management and control measures relevant to those areas where the</i>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				<i>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>
CWa-08	Hydrology, Flood Risk and Drainage	Hydrological surveys	Hydrology survey . Are they done considering each area being affected by each project? The land around Sturton is clay based and is like a bog.	The flood risk at the Sites and within the Cable Route Corridor has been assessed and is detailed within <b>6.3.10.1-6.3.10.6 Environmental Statement – Appendices 10.1-10.6 Flood Risk Assessment and Drainage Strategy Reports [APP-089 to APP094]</b> . Embedded mitigation to ensure the Sites are at an acceptable risk of flooding is explained within section <b>10.7 of 6.2.10 Environmental Statement – Chapter 10 Hydrology Flood Risk and Drainage [APP-048]</b> .
CWa-09	Noise and Vibration	Aggregate noise impacts	Noise the solar panels buzz. Together the noise will bounce off itself like my septic tank box in my garden. Is the noise based on individual panels or communitive Panels?	The solar panels themselves do not emit noise. Noise from electrical infrastructure supporting the panels has been assessed and no significant effects have been identified. Please refer to <b>WB6.2.15 ES</b>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				<b>Chapter 15 Noise and Vibration [APP-053].</b>
CWa-10	Soils and Agriculture	Sheep grazing – farming circumstances	An expert said that in California. Are the statistic based on California which is much hotter to the amount of sunlight we have here? sheep grazing under the panels? The ground is saturated and water runs off the panels. Sheep dont swim and to put them under neath would be cruel.	Solar panels provide shelter for livestock, shade from direct sun as well as protection from wind and rain. Heat stress is not uncommon for livestock without shade in the UK. Livestock will not be present on the site year round, but instead will be brought to the site when there is suitable forage for them. They are unlikely to be put out on the solar farm over winter, when there is little forage growth available or in need of control.
CWa-11	Health and Wellbeing	Direct impacts on health	Affect on People. A survey was done using statistics from working pensions, censors records and desk top surveys. Will there be an impact on the health of people close to the panels and battery packs/ Is there any research to back up the safety of the panels and battery packs? I have contacted my GP and he is going to monitor the heat lth of his patient if projects go ahead.	The Applicant has set out the list of information sources used for undertaking the health and wellbeing assessment in the ES in <b>WB8.1.28 Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 4 and Responses to Action Points [REP4-071].</b>  The Applicant directs the party to previous responses to comments on electromagnetic fields at 7A-43 (pg.190), SE-02 (pg.526-529), and AIR-01 (pg.546), and to the risks to health from fire and

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				smoke from BESS fires at AIR-01 (pg.543-548) in <b>8.1.2 The Applicants Responses to Relevant Representations [REP1-050]</b> .
CWa-12	Hydrology, Flood Risk and Drainage	Existing flood events	The expert said Minor flooding Gainsborough. Gainsborough was shut due to the Trent busting its banks. Id say that was major flooding.	The Applicant acknowledges the existing flood risk within the Order limits. The flood risk at the Sites and within the Cable Route Corridor has been assessed and is detailed within <b>6.3.10.1-6.3.10.6 Environmental Statement – Appendices 10.1-10.6 Flood Risk Assessment and Drainage Strategy Reports [APP-089 to APP094]</b> . Embedded mitigation to ensure the Sites are at an acceptable risk of flooding is explained within section <b>10.7 of 6.2.10 Environmental Statement – Chapter 10 Hydrology Flood Risk and Drainage [APP-048]</b> .
CWa-13	General	Planning enforcement	I asked who is Policing all the projects within the area of West Burton Power station? Since the 1st of January 2024. This is what has happened around my home, West Burton and the fields adjacent so it. on 19th December 2023. Bassetlaw Council passed West Burton C to put more battery packs on site. The planning committee had and afternoon with the project lead and were show around and where the badgers would be move if	The Applicant notes this comment.



Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			the project was passed. The committee passed the project saying the 'Bassetlaw would show then how to do it right' They were not interested in the flooding and it was just raining. 340 vehicles a day were also passed with the project.	
CWa-14	General	Impacts from demolition of West Burton A power station	<p>The demolition for west burton A had been passed by Bassetlaw council. I knew it was going to be taken down but was not informed of the start of it, January 30th I had a meeting with Brown and Mason. They informed me that on the 8th February a tower was being blown up and it might be a bit loud. It wasn't as i was shielded by the cooling towers. However other in the village thought they were going to loose there windows. I was also informed that as the as the demolition got closed to my home I would have to move out. Will my contents be safe??? don't know yet</p> <p>On Thursday 22nd February at Cottam Power station the control room was demolished. The villages are still cleaning up from the dust and debris and it was raining. The garage in South Leverton's roof shook.</p> <p>I am right next door has the impact been assessed when permission was given. I understand that it has to come down but some information for Bassetlaw would have been a polite way to go.</p>	The Applicant notes this comment, however the impacts from the demolition of the West Burton A power station are not related to this Scheme.

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
CWa-15	General	Impacts from decommissioning of West Burton A power station	At the moment they have one wagon a day which will increase to 10 a day soon. Plus all the machine they need to do their work. They are between 10 and 30 wagons leaving West Burton a day taking col out which is being shipped back to south Africa, It has finished and Ash is now being shipped out. The decommissioning I thought was just pulling a plug. Wrong. The services are being re routed to service the working parts of west Burton. The main road is being dug up by excavators and dumpers run up and down iy. Plus Wagons taking the soils off site. This is a necessary but noisy process.	The Applicant notes this comment, however the impacts from the demolition of the West Burton A power station are not related to this Scheme.
CWa-16	General	Impacts from decommissioning of West Burton A power station	February 12th The main Gainsborough road is being dug up along the the same side of the as the Power Station and would run in front of the lane in which I live and the Quarry. I was told this by a chap how didn't introduce himself only said ' Sorry love forgot to tell you we would be digging the lane up. We will do it in two half so it wont affect you' Then he went. The digging then went to the other side of the road because it was easier. Did it go back to planning and the highways? Will the Main Gainsborough road be closed because of it????? The daffodils are being cast aside. The work was being carried out without informing EDF the owners of the site at West Burton C. They knew nothing about it or who was doing it. There has	The Applicant notes this comment, however the impacts from the demolition of West Burton A power station are not related to this Scheme.

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			been a 100 meters of hedge removed at West burton Plus another 20 further round. All that is left is a piece of barbed wire which I pointed out to EDF. They knew nothing about the hedge being removed or who had done it. They did nothing about it. It now has blue poo bags on it and can be seen	
CWa-17	General	Operations relating to quarry	The quarry have removed a 6 meter area of a wood and a 500 meters of hedge row and trees. This has been passed by NNC. The quarry when up and running have permission for 175 vehicles From North Street to New holland along the Catchment drain there are 2 trees removed. One leaving the Drain hazardous. By whom??	The Applicant can confirm that these works are not related to this Scheme.
CWa-18	Transport and Access	Cumulative traffic levels	We also Have passed Bubble bee who will be adding to the flow of traffic in the area plus other projects	A cumulative assessment is set out in Section 10 of the Transport Assessment and within Section 14.9 of the <b>6.2.14 Environmental Statement - Chapter 14_Transport and Access [APP-052].</b>  <b>ES Addendum 23.1: Cumulative Effects [EN010132/EX5/WB8.4.23.1]</b> , submitted at Deadline 5, compiles all updates on the assessments of cumulative impacts since the submission of the DCO application.
CWa-19	General	Planning enforcement	Once the Demolishing has been complete. The concrete is crushed and left on site of further	Please refer to answer to CWa-18 above.

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>projects. Which I believe are to be industrial. Plus Steps Fusion. I asked again who is policing the projects in the area and who is making sure that Sturton and West Burton are not destroyed by all the projects. When all the projects are in full flow which have been passed there will be in excess of 600 Vehicles a day into West Burton. When will someone look at Over industrialisation Of the West Burton Site????????? Again Who is policing it ????</p>	

Dr Rodney May [REP4-108]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
RMa-01	Soils and Agriculture Energy Need	Food security Efficiency of solar	I am very concerned about food security in the UK given the solar developments proposed in West Lindsey. I have just watched a aerial video of the proposed solar farms which illustrate the extent of proven productive farm land which would be removed. I am aware of a national debate on this issue and have signed the relevant petition. Replacing a proven agricultural resource with a poor quality green energy source is in my judgement a mistake in the UK. Why did I say "poor"? Solar largely produces energy when least required. As such, I judge it will be a gross error to use so much land inefficiently at the expense of a proven contribution to UK food security	<p>The Applicant refers to their previous responses in relation to food security at LCC-21 (pg.16) in <b>WB8.1.17 Response to Written Representations at Deadline 1 Part 1 [REP3-034]</b> and SOI-01 (pg.703-706) in <b>8.1.2 The Applicants Responses to Relevant Representations [REP1-050]</b>.</p> <p>Solar generates energy during daylight hours (daytime demand is generally higher than night time demand) and generates more energy in the summer, when winds tend to be seasonally lower, supporting security of supply. Figure 8.2 of <b>7.11 Statement of Need [APP-320]</b> shows how solar is expected to work alongside other renewable and low-carbon assets to meet demand throughout the year, providing more energy in times where wind energy is lower.</p> <p>The inclusion of batteries as part of the Scheme will allow the Scheme to store energy when it is in abundance and release it to the grid when it is needed.</p> <p>Paragraph 7.6.8 of <b>WB7.11 Statement of Need [APP-320]</b> states that: <i>"Draft NPS EN-3 includes an anticipated range of 2 to 4 acres for each MW of output generally required for a solar farm along with its associated infrastructure."</i> (this text has been retained in the designated NPS EN-3 at Paragraph 2.10.17). The Scheme as proposed delivers a large-scale solar generation asset which is consistent with this range, as</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				<p>is described through paragraphs 4.2.1 to 4.2.3 of <b>WB6.2.4 ES Chapter 4 Scheme Description [APP-042]</b>. This demonstrates that the proposed location is a suitable site which will provide for an asset which is consistent with government's view of best practice ratios of land take and installed capacity.</p>

Dr Terence David Organ [REP4-109]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
TDO-01	Soils and Agriculture	Food security	Using agricultural, food producing land for solar panels is an example of short termism. The global and UK population continues to rise unchecked. More people in the future means more food will be needed. Currently the UK imports a significant proportion of our food but, in the light of population increase we cannot assume this will always be available. Agricultural land is continually lost to new housing developments and other schemes such as road widening and to promote economic growth. There may be no alternative to this loss but there is an alternative to losing food production for solar panels.	The Applicant refers to their previous responses in relation to food security at LCC-21 (pg.16) in <b>WB8.1.17 Response to Written Representations at Deadline 1 Part 1 [REP3-034]</b> and SOI-01 (pg.703-706) in <b>8.1.2 The Applicants Responses to Relevant Representations [REP1-050]</b> .
TDO-02	Alternatives and Design Evolution	Alternative locations	The tax payer's money would be better spent on making new connections to the grid so that the roofs of large industrial complexes could be used. Also new houses could be built with the roofs facing south to optimise solar energy capture.	The Applicant refers to their previous responses in relation to alternatives sites for solar installation at ALT-01 (pg.8-9) in <b>WB8.1.19 Response to Written Representations at Deadline 1 Part 3 [REP3-036]</b> .
TDO-03	Principle of Development	Cumulative scale	If all the applications in our area are approved, we will have 13,000 acres of industrialised solar zones within a 6 mile radius.	The Applicant refers to their previous responses in relation to cumulative impact on landscape character in <b>WB8.1.19 The Applicant's Responses to ExA First Written Questions at Deadline 3 [REP3-038]</b> .

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
TDO-04	Transport and Access  Ecology and Biodiversity	Hedgerow removal to provide access	Furthermore the applicants require that country lanes are widened and trees and hedges ripped out. Have we forgotten that trees and hedges remove, by photosynthesis the carbon dioxide which is the main cause of global warming? It would be better for farmers to be paid not to cut the tops off their hedges. Our rural area, much loved by those who live here, will be changed irreversibly.	The Applicant refers to their previous responses in relation to removal of hedgerows for construction works at WLDC-32 (pg.58) in <b>WB8.1.17 Response to Written Representations at Deadline 1 Part 1 [REP3-034]</b> .
TDO-05	Principle of Development	Burden of development to UK national debt	There is also the cost. The UK has a large debt and cannot afford to reduce taxes to help those in financial difficulty. Surely there must be a cheaper way of trapping the Sun's energy.	Section 2.3 of <b>WB4.2_B Funding Statement [REP4-030]</b> describes how the Scheme will be funded by private companies, and not by the Government.
TDO-06	Energy Need	Efficacy and efficiency of solar	Another point is that at the time of year when we need most electricity, the Sun is low in the sky and these panels are least effective. The panels on our house roof yield less than a quarter of the income in winter compared with summer.	The Applicant refers to their previous responses in relation to efficiency of solar energy at ALT-02 (pg.552-559) in <b>8.1.2 The Applicants Responses to Relevant Representations [REP1-050]</b> .
TDO-07	Soils and Agriculture	Food security	More thought needs to be given to the best way of utilising the energy from the Sun without jeopardising food production and 'England's Green and Pleasant Land'. The best way to proceed needs to be given more careful thought. Please do not pass this application	The Applicant refers to their previous responses in relation to food security at LCC-21 (pg.16) in <b>WB8.1.17 Response to Written Representations at Deadline 1 Part 1 [REP3-034]</b> and SOI-01 (pg.703-706) in <b>8.1.2 The Applicants Responses to Relevant Representations [REP1-050]</b> .



Helen Mitchell [REP4-110]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
HMi-01	Cumulative Development	Aerial Flyover	West Burton submission - Cottam aerial footage of 4 parks, REP4-104 I would like to draw your attention to this aerial footage on the Cottam planning inspectorate website. <a href="https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010133/EN010133-001638-C8.2.12 Aerial Flyover Footage using Google Earth Data (Low Resolution).mp4">https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010133/EN010133-001638-C8.2.12 Aerial Flyover Footage using Google Earth Data (Low Resolution).mp4</a>	The Applicant notes this comment and confirms an aerial flyover for the Scheme has been submitted [REP4-098].
HMi-02	Cumulative Development Landscape and Visual Impact Health and Wellbeing	Impact on landscape character and amenity	The cumulative effect of these projects will be a huge blight on the countryside where I live. I live in as it has a good range of amenities, is close to my work, and most importantly I feel happiest when surrounded by green open space. I enjoy the views when driving, walking, looking out of my windows, the feeling of space, the positive effect on my mental health from being in this kind of environment rather than a built up industrialised area which is what the countryside around me will become if these large scale projects are allowed to go ahead. They will change the whole character of the area for decades to come, the rest of my lifetime. Public rights of way across fields will be affected visually, if they still remain at all.	The Applicant refers to their previous responses in relation to cumulative impact on landscape character in <b>WB8.1.19 The Applicant's Responses to ExA First Written Questions at Deadline 3 [REP3-038]</b> .
HMi-03	Principle of Development	Cumulative	This aerial view footage shows four very large projects planned in very close proximity to each other, it will engulf many small villages on multiple sides. Huge expanses of land. It should also show projects Steeple	The Applicant notes this comment. The Steeple Renewables Project is located to the south of West Burton

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>Renewables at Sturton le Steeple and Stow Park as these areas are visible on this map. It makes me feel physically sick to see. These cumulative projects will cover approximately 16 miles by 8 miles of fields, farmland and wonderful countryside in this area. Every time I go out in my car, every journey I take, I am going to be confronted by this monstrosity as it covers such a huge area with each proposal next to one another.</p>	<p>Power Station around Sturton Le Steeple. The cable corridor for the Scheme will be located within land shown to be part of the order limits for the Steeple Renewables Project. Currently this scheme has undertaken a non-statutory consultation during October-December 2023. There has been no EIA scoping submitted for the Scheme. The approach to cumulative assessment is set out in <b>Chapter 2 EIA Process and Methodology [APP-040]</b> and <b>Technical Note on Cumulative Effects of Additional Schemes Revision A [EN010132/EX5/WB8.2.5_A]</b>. In accordance with the tiers set out in these documents, this project doesn't fall into any of those tiers and therefore until further information is available in the public domain it will not be considered further. However, the Applicant is liaising with the developers of the Steeple Renewables Project to ensure that it can co-exist with the Scheme.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				An Assessment of Cumulative Effects for Stow Park is provided in the cumulative assessment set out in the <b>Technical Note on Cumulative Effects of Additional Schemes [REP4-073]</b>
HMi-04	Socio-economics, Tourism and Recreation  Health and Wellbeing	Impact on mental health	The Nature and Mental Health Report produced by mental health charity Mind, states that spending time in nature can actually reduce anxiety and depression. Sitting on a bench to take in the views or to walk through fields or along a riverbank are a privilege and a pleasure appreciated by many. Taking your dog for a walk through a solar park with a tunnel of metal fences, security cameras, storage batteries, will create the opposite; anxiety, stress and depression. This will seriously affect the mental health of myself and my family and we do not want it.	The Applicant refers to their previous responses in relation to impacts on recreational access to the countryside at 7A-21 (pg.171), LAN-02 (pg.627), OEM-04 (pg.649-654) in <b>8.1.2 The Applicants Responses to Relevant Representations [REP1-050]</b> .
HMi-05	Socio-economics, Tourism and Recreation	Property prices and desirability	Residents will be wishing they could move away, or had not moved here in the first place, but will then face the worry that house prices will be affected. I noticed a property for sale in Thorpe le Fallows which the agent Fine & Country describes as being 'In a little hamlet surrounded by open fields with far-reaching views' and 'Thorpe-Le-Fallows is a well-kept secret, halfway between Lincoln and Gainsborough and halfway between Sturton by Stow and Scampton – close enough for central Lincoln commuting convenience and far enough for rural peace and tranquility. It's a small hamlet surrounded by beautiful	The Applicant notes this comment.  Regarding the Scheme's potential effect on property prices, the Applicant understands that there is no empirical research or evidence that suggests solar farms affect nearby property values.

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			Lincolnshire farmland which in the pre-industrial age must have been some of the most valuable and productive in the country judging by the quality of the churches that have been built'. This is one of many estate agents listings I have seen which point to the views and surrounding countryside as a selling point. It would be absolutely criminal to let a current fad for solar parks destroy the valuable farmland, history, tourism and desirability of this area. It seems Lincolnshire has become a dumping ground for these projects.	
HMi-06	Landscape and Visual Impact Ecology and Biodiversity Soils and Agriculture	Hedgerow removal and biodiversity loss	We are going to see hundreds of miles of ancient hedgerows and trees ripped out, I would love someone to explain why this is acceptable or why our precious flora and fauna is to be sacrificed at the altar of green energy. It seems like a contradiction. The devastation this will cause to our amazing wildlife we are privileged to have living around us is truly shocking. Replacement hedgerows will take decades to grow. Wildlife routes will be affected. There will loss of natural habitat for a wide range of species. I don't believe grass and or other plants will be able to grow underneath the vast area of panels. The mention of grazing sheep is purely a marketing tactic.	The Applicant refers to their previous responses in relation to removal of hedgerows for construction works at WLDC-32 (pg.58) in <b>WB8.1.17 Response to Written Representations at Deadline 1 Part 1 [REP3-034]</b> .  Sheep have been successfully grazed below solar PV in the UK for over a decade. More information regarding grazing sheep at the Site is given in response to SSk-26 in this document.
HMi-07	Ecology and Biodiversity	Impacts on biodiversity	Britain's native wildlife species have declined dramatically over the past 50 years. Creating safe habitats for wildlife to live, shelter and breed has never been more important. What will happen to the	The Applicant reiterates that only a small number of short sections of hedgerow will be removed to gain vehicular access to certain fields for construction and

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>nesting birds, hibernating hedgehogs, dormice and other small mammals, as well as insects like beetles and butterflies. Many species use hedgerows for food such as leaves, flowers, berries, insects or small mammals. Some species rely on hedgerows as shelter from predators or the elements whilst out foraging. Birds rely on berries in hedgerows for food in winter. Hedgerows criss-cross the country, enabling wildlife to move about the landscape. They consequently connect populations that would otherwise be isolated and vulnerable. Bats use hedgerows as both feeding sites and flight paths for commuting between their roosts and other suitable foraging sites. Butterflies and other flying insects take advantage of the shelter hedges provide when in flight. The People's Trust for Endangered Species states over 500 plant species, 60 species of nesting bird, many hundreds of invertebrates and almost all of our native small mammal species have been recorded as being supported by hedgerows. As many as 16 of the 19 birds included in the Farmland Bird Index are associated with hedgerows, while 10 of these indicator species use hedgerows as a primary habitat. For more information read <a href="https://ptes.org/hedgerow/hedgerow-wildlife/">https://ptes.org/hedgerow/hedgerow-wildlife/</a></p>	<p>maintenance where there currently is none. The Applicant refers to their previous response given in <b>[REP1-050], Responses to Relevant Representations</b>, item reference LCC-27, and in <b>[REP3-036], Responses to Written Representations: Part 3</b>, item reference ECO-02, and at WLDC-32 (pg.58) in <b>WB8.1.17 Response to Written Representations at Deadline 1 Part 1 [REP3-034]</b>.</p> <p>Considerable new, additional hedgerow planting will be carried out as secured by the <b>7.3_D Outline Landscape and Ecological Management Plan Revision D [REP4-045]</b></p>
HMi-08	Alternatives and Design Evolution	Alternative locations for solar	CPRE, the countryside charity, is calling for a "rooftop revolution". Its website says: "Putting solar panels on rooftops across the country can help us to generate	The Applicant refers to their previous responses in relation to alternative sites for solar installation at ALT-01 (pg.8-9) in

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>the clean electricity we need, while cutting our carbon emissions and sparing land for food, farming and nature." They also want car parks to be used as "power stations" and add that putting panels on warehouses, schools, car parks and farm buildings, can be quickly roll out renewable energy "without harming wildlife, food security and landscapes." The research, by the UCL Energy Institute, for CPRE, shows that decarbonising the national energy grid requires far less land than feared. It also reveals that the potential of brownfield sites to generate renewable energy is dramatically underused. Rooftops can provide over half our solar energy targets, report shows. The CPRE has found that over half the solar panels needed to hit national net zero targets could be fitted on rooftops and on car parks. Sign the petition here  <a href="https://www.cpre.org.uk/explainer/rooftop-solar-revolution-turning-possibility-into-reality/">https://www.cpre.org.uk/explainer/rooftop-solar-revolution-turning-possibility-into-reality/</a>  <a href="https://takeaction.cpre.org.uk/page/127929/petition/">https://takeaction.cpre.org.uk/page/127929/petition/</a>            In fact, the government estimates there are 250,000 hectares of south-facing, industrial roof space across the country. Please tell me why these solar projects cannot be located on brownfield sites, warehouse rooftops, new housing developments rooftops, the old power station sites which they intend to connect to?</p>	<p><b>WB8.1.19 Response to Written Representations at Deadline 1 Part 3 [REP3-036].</b></p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
HMi-09	Alternatives and Design Evolution	Alternative locations for solar	The Bentley factory in Crewe, photos attached, has used solar panels at its factory for over 10 years. With a total area of 60,911 m <sup>2</sup> – equal to nine football pitches, able to generate 10 MW of power in total – enough to power 2,370 homes per year and capable of delivering up to 75 per cent of the plant's daytime electrical demand on average and can peak at 100 per cent. It is clear to see there are other options for renewable energy! The developers of all the proposals in this area keep commenting that this landscape is already industrialised because of the cooling towers on the horizon. They clearly know nothing about this area as the power stations are located in Nottinghamshire, on the other side of the River Trent, not Lincolnshire where these solar park proposals are.	The Applicant refers to their previous responses in relation to alternatives sites for solar installation at ALT-01 (pg.8-9) in <b>WB8.1.19 Response to Written Representations at Deadline 1 Part 3 [REP3-036]</b> .
HMi-10	Principle of Development	Cumulative development	I have also attached a map shows 9 solar Nationally Significant Infrastructure projects amounting to (27,000 acres), with 5 (13,000 acres) falling within a 10km radius in our area! The schemes shown include, but are not limited to; Cottam Solar Project, West Burton Solar Project, Gate Burton Solar Project, Till Bridge Solar, Steeple Renewables all within a 10 km radius (13,000 Acres). Voltis Solar (currently scoping), One Earth Solar, Fosse Green and Great North Road. This is not by any means the complete picture for Lincolnshire with at least 4 more to the south, being Spring Well, Heckington Fen, Beacon Fen, & Mallard Pass	Please refer to the Applicant's response to comment reference 7A-01 above.

James Barlow [REP4-111]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
JBa-01	Principle of Development	Cumulative development	This project together with other projects in and around Sturton-Le-Steeple represents an over industrialisation of this rural village. In planning/preapplication there is a number solar farms, a number of battery storage facilities, demolishing West Burton power station and redevelopment of the site with a nuclear power facility, a sand and gravel quarry passed and a number of solar cable connections into West Burton and New National Grid overhead cables. On the West Burton Solar project the Developer has not communicated or engaged with the residents of Sturton-Le-Steeple even though it impacts the village. Their focus has been the location of the solar panels and not the full project which also impacts the Bassetlaw District (Cable routes & Battery Storage)	The Applicant refers to their previous response in relation to this matter at 7A-02 (pg. 134), <b>WB8.1.2 The Applicant's Responses to Relevant Representations [REP1-050]</b> .



Julian Plews, Lee Plews and Tracy Adderley [REP4-112; REP4-113 and REP4-117]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
JPLPTA-01	Principle of Development	Cumulative development	I strongly object to the West Burton solar farm proposal. It is just 1 of 4 Solar, Nationally Significant Infrastructure Projects (NSIPs) within a few miles of each other and together these would create the largest solar farm complex in Europe, amounting to some 10,000 acres in total. We must look at all 4 of the proposals together rather than independently given the scale of the projects. The submission of all these projects together, the documentation involved and the timetables for them makes it impossible for the people affected by the plans to fight them all at once. The West Burton Solar proposal, at over 2,000 acres, combined with the other 3 proposals have a cumulative effect of 10,000 acres of farmland lost and the industrialisation of the area as a whole.	The Applicant refers to their previous response in relation to this matter at 7A-02 (pg. 134), <b>WB8.1.2 The Applicant's Responses to Relevant Representations [REP1-050]</b> .
JPLPTA-02	Soils and Agriculture	Food security	Food security is now a big issue and the government is changing its stance, wanting more productive farmland, not less (see the Government Food Strategy document June 2022). Over the previous 40 years we have gone from producing 78% of our own food down to 64% and the cost of importing food is increasing all the time. To lose 10,000 acres (in total) of good arable land is ridiculous. Rishi Sunak says those fields should be bulging with "fantastic produce" and we must "not lose swathes of our best farmland to solar farms".	The Applicant refers to their previous responses in relation to food security at LCC-21 (pg.16) in <b>WB8.1.17 Response to Written Representations at Deadline 1 Part 1 [REP3-034]</b> and SOI-01 (pg.703-706) in <b>8.1.2 The Applicants Responses to Relevant Representations [REP1-050]</b> .

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
JPLPTA-03	Planning policy	National energy policy	Jeremy Hunt is pushing to speed up planning permission for nuclear power plants and offshore wind to boost growth and bring down energy bills. In the UK, solar panels produce on average around 11% of their rated output – and they produce most of that power on sunny, summer days when we least need it. When demand is at its highest, on winter evenings, they produce nothing at all.	The Applicant refers to their previous response in relation to this matter at 7A-36 (pg. 185), <b>WB8.1.2 The Applicant's Responses to Relevant Representations [REP1-050]</b> .
JPLPTA-04	Planning policy  Alternatives and Design Evolution	National energy policy  Alternative renewable energy sources	The government has just approved Sizewell C . Nuclear is the only form of reliable, low carbon electricity generation which has been proven at scale and returns more than 100 times as much power as a solar site of the same size. This will increase civil nuclear power to up to 24GW by 2050 – 3 times more than now and representing up to 25% of projected electricity demand. The United Kingdom has been estimated to have over a third of Europe's total offshore wind resource, which is equivalent to three times the electricity needs of the nation at current rates of electricity consumption (In 2010 peak winter demand was 59.3 GW,[52] in summer it drops to about 45 GW). The government has committed to a major expansion of offshore capacity to 50 GW by 2030. By 2023, the UK had over 11 thousand wind turbines with a total installed capacity of 30 gigawatts (GW): 15 GW onshore and 15 GW offshore. New research published 13th February2023 by RenewableUK's EnergyPulse data analysts shows that	The Applicant refers to their previous responses in relation to alternative renewable energy technology at ALT-02 (pg.10-11) in <b>WB8.1.19 Response to Written Representations at Deadline 1 Part 3 [REP3-036]</b> .

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			the UK's pipeline of offshore wind projects at all stages of development now stands at 99.8GW across 130 projects – an increase of 14GW over the past 12 months. This includes 13.7GW of fully operational capacity and a further 13.6GW under construction or with support secured for a route to market. Dogger Banks A, B and C which are active/being constructed will produce 3.6GW of electricity alone. We do not need this solar project. This does not take into account the new STEP project at West Burton and the electricity that will (perhaps) be produced there.	
JPLPTA-05	Socio-economics, Tourism and Recreation	Employment and labour	Solar farms will destroy agricultural jobs, skills and livelihoods and create very few new skilled jobs or replace livelihoods. Most of the equipment is likely to be manufactured in China and non-local labour used in construction. It is likely there will be a likely net reduction in employment, in an area with relatively few opportunities. Tourism to the area will be devastated and businesses ruined. There will not be any economic benefit to the communities affected. It seems to me that Lincolnshire has been chosen because it is one of the least populated counties and therefore fewer objections will be raised against projects like this and small rural villages and hamlets will be swamped by industrialisation – the county will be ruined forever.	<p>The Applicant refers to previous responses to comments on socio-economics, tourism and recreation at Section 2.14 of <b>WB8.1.19 Response to Written Representations at Deadline 1 Part 3 [REP3-036]</b>. With regard to manufacturing and ethical sourcing, please refer to PRI-01 (pg.65) <b>[REP3-036]</b>.</p> <p>The Applicant strongly refutes any implication that there is a deliberate attempt to locate the Scheme in an area of lower population density to limit public engagement, action, or influence.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
JPLPTA-06	Ecology and Biodiversity	Construction impacts	No matter what precautions and assurances, it will not be possible to deliver and install millions of solar panels, pour thousands of tonnes of concrete, as well as containers with batteries and switchgear, all surrounded by miles of fencing, without damaging habitat. And this construction would take between 5 to 7 years to complete.	Please refer to responses ECO-01 and ECO-02 in <b>WB8.1.2 The Applicant's Responses to Relevant Representations [REP1-050]</b> .
JPLPTA-07	Waste	Replacement and disposal of solar panels	Also it is my understanding (from The Times) that the life span of solar panels is about 20 years so they will need replacing at least twice and the old ones will need recycling (by who?) or just scrapped (where?). When the 60 year project is completed how will all the panels be removed? How will the concrete bases be dug up and where will it all be dumped?	<p>The Applicant refers to previous responses to comments on lifespan of solar panel equipment at GEN-05 (pg.33-34) of <b>WB8.1.19 Response to Written Representations at Deadline 1 Part 3 [REP3-036]</b>.</p> <p>The Applicant confirms that as set out in <b>6.2.20 ES Chapter 20 Waste [APP-058]</b>, during the Scheme's decommissioning, solar panels will be recycled and disposed of by Waste Electronics and Electrical Equipment (WEEE) handlers in Lincolnshire or Nottinghamshire, or by specialist waste handlers that may or may not begin to operate prior to the Scheme's decommissioning.</p> <p>Any concrete foundations on the substation areas, for inverters, or where concrete feet have been used for non-ground-penetrating foundations for solar panels, will be recycled and disposed of through county Construction,</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				Demolition and Excavation waste handling sites.
JPLPTA-08	Climate Change	Embodied carbon	And what is the carbon footprint of the production/transportation and installation of these solar panels especially as the majority will come from China (which is heavily dependent on fossil fuels for production). It's all very well saying that the electricity produced in the UK is green but not if more carbon gasses have been emitted elsewhere than are saved in the UK.	The Climate Change assessment in <b>WB6.2.7 ES Chapter 7 Climate Change Revision A [REP1-012]</b> has considered emissions generated by transport of materials from Europe and China. The conclusion of the chapter is that these emissions and other embodied carbon from construction of the development would be offset by the carbon savings from operation of the development compared to non-renewable sources.
JPLPTA-09	Soils and Agriculture	Restoration of land to arable	Does anyone really believe that after 60 years the fields will be viable as agricultural food producing land – how can the applicant guarantee that the land will be as fertile as it is now and how will this be achieved?	The Outline Soil Management Plan <b>[REP3-017]</b> is secured by Requirement 19 to the draft DCO <b>[EX5/WB3.1_F]</b> . A detailed Soil Management Plan must be submitted for approval and must be substantially in accordance with the OSMP. The aim of the SMP is the preservation of the soil resource at the site during construction, operation and decommissioning - avoiding both the loss of soil material from the site and the loss of soil functional capacity for supporting agricultural production.  Fertility is routinely maintained by farmers according to the economic need of the crop. Farmers seek to avoid a build-up of nutrients

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				<p>as this is wasteful and can cause environmental harm. Defra R&amp;D project LE0206 demonstrates that agricultural land quality and versatility can be retained following restoration of open cast mineral and landfill sites.</p>
JPLPTA-10	Transport and Access	Suitability of access roads	<p>Much of the construction traffic will still be using single track country lanes which are already in a poor condition. It also raises concerns over the risks to pedestrians, cyclists, horses, wildlife and other traffic.</p>	<p>The <b>outline Construction Traffic Management Plan (oCTMP) [REP4-038]</b>, provides 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. It is an evolving document that will be updated prior to construction to add detail that arises from the post-determination procurement and Engineering Principal Contractor (EPC) appointment. A Final CTMP, substantially in the same form as this Outline CTMP, will be approved by the relevant planning authorities in consultation with the Local Highway Authorities prior to construction commencing [paragraph 1.5 of oCTMP].</p> <p>The oCTMP provides information on the following:</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				<ul style="list-style-type: none"> <li>• Construction methodology;</li> <li>• Site access;</li> <li>• Construction vehicle trip generation;</li> <li>• Construction vehicle routing;</li> <li>• Abnormal load movement; and</li> <li>• Mitigation and management measures.</li> </ul> <p>The Final CTMP is secured through <b>requirement 15 of the DCO [REP4-024]</b>.</p>
JPLPTA-11	Landscape and Visual Impact	Landscape character	<p>The cumulative scale of the development is unprecedented, and the impact of such a development would change the character and nature of the area for 80 years or more, such a change has the potential to have a significant detrimental impact on the general health and wellbeing of residents. On this site alone there would be 2,000 acres of solar panels which would change the landscape totally and would destroy the scenic beauty of the area. I strongly urge that this proposal be rejected</p>	<p>The Applicant refers to their previous responses in relation to cumulative impact on landscape character in <b>WB8.1.19 The Applicant's Responses to ExA First Written Questions at Deadline 3 [REP3-038]</b>.</p>

Pauline Margery Organ [REP4-114]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
PMO-01	Soils and Agriculture	Food security	The global and UK populations are increasing unchecked. Therefore there will be a greater demand for food. *much of the world's land is becoming unsuitable for crops due to climate change, so the land area which as good soil, stable climate, freedom from war and natural disasters, eg earthquakes IS INCREASINGLY PRECIOUS * Lindsey land has all these attributes. IT MUST NOT BE LOST TO SOLAR , FOOD SECURITY IS PARAMOUNT.	The Applicant refers to their previous responses in relation to food security at LCC-21 (pg.16) in <b>WB8.1.17 Response to Written Representations at Deadline 1 Part 1 [REP3-034]</b> and SOI-01 (pg.703-706) in <b>8.1.2 The Applicants Responses to Relevant Representations [REP1-050]</b> .
PMO-02	Soils and Agriculture	Food security / biofuels	* as well as corn, this land grows oil seed rape. Olive crops are failing because of increased temperature, so OSR will become true gold.	The Applicant refers to their previous responses in relation to food security at LCC-21 (pg.16) in <b>WB8.1.17 Response to Written Representations at Deadline 1 Part 1 [REP3-034]</b> and SOI-01 (pg.703-706) in <b>8.1.2 The Applicants Responses to Relevant Representations [REP1-050]</b> .
PMO-03	Ecology and Biodiversity	Impact on wildlife and on hedgerows and trees	Wildlife will be decimated, in an already depleted nation. Not only the areas covered by panels will be affected, but there will be immense collateral damage, hedgerows torn up and species-rich verges destroyed to widen access roads. These would be irreplaceable, even if thousands of trees were planted to offset the damage.	The Applicant refers to their previous responses in relation to removal of hedgerows for construction works at WLDC-32 (pg.58) in <b>WB8.1.17 Response to Written Representations at Deadline 1 Part 1 [REP3-034]</b> .



Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
PMO-04	Alternatives and Design Evolution	Alternative locations	*There are viable alternatives, eg roof-top, even if grid connections are less straight forward	The Applicant refers to their previous responses in relation to alternatives sites for solar installation at ALT-01 (pg.8-9) in <b>WB8.1.19 Response to Written Representations at Deadline 1 Part 3 [REP3-036]</b> .
PMO-05	Waste	Recycling and disposal of panels	disposal of panels after their life, 30-40 years, is a huge, polluting problem, as is occurring in Australia already. They will be almost obsolete before being functional Panels are difficult to recycle and mining for their raw materials causes great destruction	The Applicant refers to previous responses to comments on waste matters in Section 3.16 (pg.722-728) of <b>8.1.2 The Applicants Responses to Relevant Representations [REP1-050]</b> and at GEN-05 (pg.33-34) of <b>WB8.1.19 Response to Written Representations at Deadline 1 Part 3 [REP3-036]</b> .
PMO-06	Noise and Vibration	Noise impacts	*Here, sound pollution will disturb wildlife and well as affecting human mental health	The Applicant re-iterates that Chapter 15: Noise and Vibration of the Environmental Statement <b>[APP-053]</b> concludes that, with the implementation of mitigation, no likely significant adverse effects are anticipated resulting from noise during the construction, operation and maintenance, and decommissioning of the Scheme.
PMO-07	Light Pollution	Light pollution impacts on wildlife	Light pollution will disrupt breeding and migration, as well as destroying the necessary habitats	The Applicant refers to responses already given within item CRT-12 in <b>WB8.1.2 The Applicants Responses to Relevant Representations [REP1-050]</b> and 7A-120 in <b>8.1.18 Response to</b>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				<b>Written Representations at Deadline 1 Part 2 [REP1-035].</b>
PMO-08	Soils and Agriculture	Food security	A total of 30,000 acres in a 6 mile radius is disproportionate. Look at the whole country and select areas where there FOOD SUPPLY WILL NOT BE COMPROMISED. *THIS IS PRIME AGRICULTURAL LAND (even if attempts have been made to reclassify it as otherwise...you just need to see the thousands of tonnes of grain being harvested) *the projects must be scaled down, greed of landowners is at the root of these huge areas being lost	The Applicant refers to their previous responses in relation to food security at LCC-21 (pg.16) in <b>WB8.1.17 Response to Written Representations at Deadline 1 Part 1 [REP3-034]</b> and SOI-01 (pg.703-706) in <b>8.1.2 The Applicants Responses to Relevant Representations [REP1-050]</b> .

P Mitchell [REP4-115]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
PMi-01	Principle of Development	Objection to Scheme in principle	I Object to the West Burton Solar Scheme and concur with all other Interested Parties who have also opposed and raised objections during the period of the examination to date.	The Applicant notes this comment.
PMi-02	Cumulative Development	Aerial Flyover	I welcome the request for the Applicant to provide a video of Flyover of the land within the order limits as set out in the Planning Inspectorate's Action Points (No. 8) arising from Issue Specific Hearing 3 (ISH3) by Deadline 4. This will be most beneficial for all Interested Parties to view. In the interim I felt it equally beneficial for the aerial footage contained in the Google Earth video of the Cottam Solar Scheme to be made available to the Planning Inspectorate (for the West Burton Solar Scheme) as this aerial footage also includes West Burton Solar, Gate Burton Solar and Tillbridge Solar which can be viewed in the link below:- <a href="https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010133/EN010133001638C8.2.12%20Aerial%20Flyover%20Footage%20using%20Google%20Earth%20Data%20(Low%20Resolution).mp4">https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010133/EN010133001638C8.2.12%20Aerial%20Flyover%20Footage%20using%20Google%20Earth%20Data%20(Low%20Resolution).mp4</a> It is fair to say the above aerial footage of the four solar schemes on the Cottam Solar National Infrastructure website is heart breaking and sickening to watch. I, along with everyone who has made formal representations/submissions to the Planning Inspectorate and who oppose West Burton Solar	The Applicant notes this comment and confirms an aerial flyover for the Scheme has been submitted <b>[REP4-098]</b> .

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>together with Cottam Solar, Gate Burton Solar and Tillbridge Solar, have known from the outset the horrifying and monstrous scale of these schemes amounting to 10,000 acres but to witness the aerial view on the Cottam Solar Planning Inspectorate's website exposing the loss and destruction of the present wildlife diverse, uninterrupted countryside, productive agricultural land and the inescapable ruin of the 30 affected communities is soul destroying. Totally surrounding and overwhelming villages North, South, East and West. The scale of this destruction of the countryside and of the harm to the welfare and lives of the affected communities cannot be allowed to proceed. Rural areas are not industrial areas. The Examining Authority for West Burton Solar should also be aware that the aerial footage does not represent the total acreage involved as it does not include the Steeple Renewables or Luminous Energy Stow Park solar projects, which I believe it should as these two further projects bring the total acreage to 13,000 of industrialised solar zones, all within a 10 kilometre radius (6 miles). In total there are 27,000 acres of our farmland making Nottinghamshire and Lincolnshire under threat from solar farm developments including, but not limited to, Voltis Solar (currently scoping), One Earth Solar, Fosse Green and Great North Road with at least 4 more to the south being Springwell, Heckington</p>	

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			Fen, Beacon Fen and Mallard Pass. See map on page 4 below.	
PMi-03	Principle of Development	Planning balance	This is not a delicate balance in any shape or form between protecting rural communities, levelling-up and recognising the climate emergency. We need to save and protect our countryside, farmland and rural communities from the folly of these schemes which are nothing short of environmental and psychological vandalism that will blight the English countryside for 60 years and more ..... rooftop solar can contribute hugely towards the Government's aim.	The Applicant notes this comment.  Section 7 of 7.5 <b>Planning Statement [REP4-049]</b> concludes with a consideration of the Planning Balance and justifies how the overwhelming national need, as demonstrated in the Statement of Need, outweighs any potential significant adverse impacts which, as the <b>Environmental Statement [APP-039 to APP-061]</b> sets out, are limited, and will be considered by the Secretary of State in making a decision on the application.
PMi-04	Planning Policy  Alternatives and Design Evolution	Rooftop solar	I would like to see the Government apply the highest possible standards requiring rooftop solar panels to be installed on all new buildings (and in retrospect to suitable existing buildings be they residential and/or commercial/farm buildings). This approach also aligns with a more distributed model of energy generation which can enhance resilience and reduce transmission losses. It is a common sense immediate and long term approach to maximising carbon savings, lowering bills, sparing land for nature and farming and a sensible and fairer approach to levelling-up within ALL areas of the UK. A recent new housing development in my local area has installed high quality integrated solar panels	The Applicant refers to their previous response in relation to rooftop solar on 7A-26 (Pg 176), <b>8.1.2 The Applicants Responses to Relevant Representations [REP1-050]</b> .

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			on the roofs all of the houses ..... a builder to be commended.	
PMi-05	Energy Need	Requirements and financial viability	<p>In light of recent developments in the global energy market, particularly the return of oil and gas prices to levels seen before the geopolitical tensions in Ukraine, a significant shift in the energy sector's dynamics is underway. This casts a shadow of uncertainty over the financial viability of numerous large-scale solar projects planned for Lincolnshire and the Midlands. What is the Applicant's response to this ?</p> <p>The current trend is not isolated to the solar industry alone; the wider renewable sector, including electric vehicle adoption and wind energy production, is experiencing a palpable slowdown. Notably, wind energy firms are reporting substantial losses, prompting a re-evaluation of production scales. This backdrop of economic and operational recalibrations within the renewable energy markets necessitates a critical assessment of our energy strategies, particularly the emphasis on large-scale solar farms on agricultural land.</p>	Section 2.3 of <b>WB4.2_B Funding Statement [REP4-030]</b> describes how the Scheme will be funded by private companies. Paragraph 2.3.4 confirms that the Applicant is confident that the Scheme is commercially viable.
PMi-07	Soils and Agriculture Climate Change	Food security	So, the pressing issue is not merely one of energy security but fundamentally of food security. It is important to prioritise both energy and food security. The decision to convert productive farmland into solar farms must be scrutinised in the context of our nation's ability to sustain its food supply. With the	The Applicant refers to their previous responses in relation to food security at LCC-21 (pg.16) in <b>WB8.1.17 Response to Written Representations at Deadline 1 Part 1 [REP3-034]</b> and SOI-01 (pg.703-706) in <b>8.1.2 The Applicants Responses to Relevant</b>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
	Hydrology, Flood Risk and Drainage		<p>global population on the rise and climatic uncertainties impacting crop yields, the importance of safeguarding our agricultural resources cannot be overstated. Furthermore, a recent Telegraph article featuring warnings from the Governor of the Bank of England underscores the risks we face as climate change risks fuelling inflation as crops fail. A crop has already been destroyed in a large field opposite the West Burton 2 site and there may well be others in this area See images on page 3 of 4 below. The recent and extensive flooding of farmland around the UK including large areas of agricultural land within Lincolnshire and Nottinghamshire in January 2024 should convey concern and pause for reflection as fields have remained waterlogged since then and the dykes surrounding these fields are full from the field run-off. If, as a result of climate change, our crop growing farmland is going to be under floodwater on a regular basis and crops fail then food shortages are liable to become the norm. Such a situation will be further aggravated if thousands upon thousands of acres of good quality food producing farmland (and that includes not only Grades 1, 2, 3 and 3a but especially 3b which does produce high yields) is sacrificed to millions upon millions of industrial scale solar panels and associated paraphernalia.</p>	<p><b>Representations [REP1-050].</b>The Climate Change chapter of the application <b>WB6.2.7_A ES Chapter 7 Climate Change Revision A [REP1-012]</b> has assessed the development's effect on Greenhouse Gas emissions and determined that there would be a net reduction as a result of operation of the development compared to non-renewable sources. As the development is a means of combatting climate change, this would also further reduce the risks associated with weather changes and crop production.</p> <p>Crop loss from flooding highlights a benefit of utilising areas of elevated flood risk for solar panel development. The embedded mitigation for the panelled areas is explained within section 10.7 of <b>6.2.10 Environmental Statement – Chapter 10 Hydrology Flood Risk and Drainage [APP-048]</b> and will ensure the safe operation of the panels during times of flood and removing the potential for loss of crops.</p>
PMi-08	Soils and Agriculture	Food security	Mr Rishi Sunak confirmed in a speech at the National Farmers Union annual conference on Tuesday, 20	The Applicant refers to their previous responses in relation to food security at LCC-

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			February 2024 that he believed 'food security' was a vital part of our national security and has reiterated this on several news programmes on National television.	21 (pg.16) in <b>WB8.1.17 Response to Written Representations at Deadline 1 Part 1 [REP3-034]</b> and SOI-01 (pg.703-706) in <b>8.1.2 The Applicants Responses to Relevant Representations [REP1-050]</b> .
PMi-09	Socio-economics, Tourism and Recreation	Tourism and visitors	Understanding Lincoln and Lincolnshire as a tourist destination is paramount in any planning deliberation with significant countryside impact. Tourism along with agriculture lies at the heart of Lincoln and Lincolnshire's economy. The visual impact of 4.5 metre high solar panels and all the associated paraphernalia will destroy the area. There will be no visual countryside and landscape benefits for tourists if these schemes go ahead which will result in the loss of livelihoods (employment and income) to those local holiday and historical destinations ie B&Bs, hotels, fishing holiday parks/lodges, shops, many other businesses and much more of the 30 affected communities within the impact area and to Lincoln and Lincolnshire as a whole.	The Applicant refers to their previous responses in relation to tourism and visitors at 7A-20 (pg.167-171) in <b>8.1.2 The Applicants Responses to Relevant Representations [REP1-050]</b> , and WLDC-57 (pg.76) in <b>WB8.1.17 Response to Written Representations at Deadline 1 Part 1 [REP3-034]</b> , and WLDC 9.1 (pg.126-130) in <b>WB8.1.20 Response to Local Impact Reports [REP3-037]</b> .
PMi-10	Socio-economics, Tourism and Recreation	Employment	The West Burton Solar Project will not bring long term employment to local people in the area in fact quite the opposite will be true once such scheme(s) above is/are completed. This assertion is without doubt withering and dismissive. No amount of mitigation put forward by West Burton Solar can compensate for the	The Applicant refers to their previous responses in relation to employment from the Scheme at 7A-155 (pg.143-145) in <b>WB8.1.18 Response to Written Representations at Deadline 1 Part 2 [REP3-035]</b> .  The Applicant refers to their previous responses in relation to cumulative



Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			overall harm this (these four plus) projects would bring to this area.	employment and economic impacts from the cumulatively assessed projects in <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b> at 7A-06 (pg.142-147) in <b>8.1.2 The Applicants Responses to Relevant Representations [REP1-050]</b> .
PMi-11	Hydrology, Flood Risk and Drainage	Flood events and water runoff	The enormous field below which is on a gradient and is opposite West Burton 2, is experiencing excessive waterlogging as is West Burton 2 and West Burton 1, preventing access by agricultural vehicles onto the land and the run off into the field drainage ditches are beyond full. Images of the serious flooding on more than one occasion in 2023 and 2024 of Lincoln and surrounding areas including the Solar project sites were submitted by the writer to the Examining Authority at Deadlines 1 and 3. How does The Applicant propose to prevent greater flooding occurring when there is excessively saturated farmland which is then followed with heavy and continuous rain or snowmelt for long periods and 4.5m solar panels are covering the land ? Waterlogged fields are causing crops to fail and in the images below it can be seen the young crop planted last year is dead - it has been destroyed.	The Applicant acknowledges the comment and refers to our response to comment reference AJo-07 in this document.

Simon Skelton [REP4-116]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
SSk-01	Energy Need	Contribution to national energy requirements	The use of a Grid connection at the West Burton 400kv substation is a negative and restrictive move in the quest for more power needed to decarbonise the UK. The UK could require 4x more power in the coming decades. When put into context this solar scheme's additional electrical output is so small that it would be lost as a mere 'rounding up' error within these enormous generation figures and will do very little but selfishly displace many thousands of acres of much needed farmland.	<p>The Applicant respectfully disagrees. Low carbon power is urgently needed to ensure that the UK stays on a successful path to net zero and thereby contributes to halting global warming. The contributions made by schemes proposed at suitable locations to achieving net zero, UK energy security and affordability of energy, are all of paramount importance. UK electricity generation capacity is expected to grow to a multiple of up to 4 on today's c.100GW of installations, and the majority of this capacity is expected to be renewable technology. It will be through the delivery of individual generation schemes, such as this Scheme and others, that the national net zero target will be reached. Therefore the contribution of each individual scheme is essential to achieving that target.</p> <p>Please also refer to the Planning Statement [REP4-049] for an overview of the Scheme and an assessment against relevant planning policy.</p>
SSk-02	Energy Need	Contribution to national energy requirements	As stated, the West Burton Solar Project would inefficiently use one of four Grid connections,	Solar, onshore wind and offshore wind generation are the only three renewable

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>utilising only about 10% of its capacity. This would be a retrograde step that must not be understated. It is a waste of important national infrastructure at a time when generation levels need to increase at a rate never seen before.</p>	<p>technologies which are likely to be deployed in bulk in the remainder of this decade, as described in Sections 5.4 (for nuclear and CCUS) and 11.4 (hydrogen) of <b>7.11 Statement of Need [APP-320]</b>. Low carbon power is urgently needed to ensure that the UK stays on a successful path to net zero and thereby does its bit to halt global warming. The contributions made by schemes proposed at suitable locations to achieving net zero, UK energy security and affordability of energy, are all of paramount importance. UK electricity generation capacity is expected to grow to a multiple of up to 4 on today's c.100GW of installations, and the majority of this capacity is expected to be renewable technology.</p> <p>Table 7.1 of <b>7.11 Statement of Need [APP-320]</b> shows the electricity generated per hectare by different low-carbon technologies. At the UK's average solar load factor (11%), solar generation produces much more energy per hectare than biogas, and generates a similar amount of energy as onshore wind. Furthermore, paragraph 7.6.8 of <b>7.11 Statement of Need [APP-320]</b> states that:</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				<p>"Draft NPS EN-3 includes an anticipated range of 2 to 4 acres for each MW of output generally required for a solar farm along with its associated infrastructure."</p> <p>The Scheme as proposed delivers a large-scale solar generation asset which is consistent with this range, as is described through paragraphs 4.2.1 to 4.2.3 of 6.2.4 <b>Environmental Statement – Chapter 4 Scheme Description [APP-042]</b>.</p> <p>The Scheme is therefore a critical scheme which will deliver low-carbon electricity to the UK's electricity system from an available and suitably located grid connection point at West Burton substation, and so will deliver an increase in UK generation as is urgently required in support of UK energy security and decarbonising the UK's energy sector.</p>
SSk-03	Alternatives and Design Evolution	Alternative renewable energy sources	These valuable high-capacity Grid connections need to be used effectively. Nuclear energy for example would reliably offer the large quantities of low carbon electricity we seek and would use brownfield sites or only cover a small footprint of land. I agree with the Atomic Energy Authority's comments regarding this matter. The predicted 24GW of installed nuclear power would provide 3x more electrical generation than the predicted 70	The Applicant refers to their previous responses in relation to alternatives renewable energy technology at ALT-02 (pg.10-11) in <b>WB8.1.19 Response to Written Representations at Deadline 1 Part 3 [REP3-036]</b> .

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			GW of installed solar power and 70GW of solar would cover an eye watering 350,000 acres of land! Promoting solar on farmland and using up all spare Grid connections is threatening the country's future ability to produce sustainable and reliable energy and of course food. All forecasts clearly state more power, not less!	
SSk-04	Energy need	Need for ground-mounted solar	Solar power plants engulfing vast areas of farmland really are the "Emperor's new clothes." But we see reality through all the solar lobbying.	The Applicant notes this comment and refers to its response SSk-01 above, in this document, in relation to the critical role the Scheme has in relation to helping deliver secure, low-carbon and affordable electricity supplies for the UK.
SSk-05	Alternatives and Design Evolution	Alternative locations for solar	If we continue on this reckless path of solar on farmland, because Brownfields and rooftops are less financially attractive, then we will totally bypass the government's requirement for a "rooftop revolution". It makes perfect sense to put solar panels on your roof at home and not in your garden. So why are we displacing hundreds of thousands of acres of farmland for solar when we have enough rooftops to give this important secondary function to. Using finite farmland for solar is "Robbing Peter to pay Paul". This is a shortsighted strategy and the only people who think this is a good idea, is the Developers and those that do not know the full facts. The scale and size of these behemoths being forced on our	The Applicant refers to their previous responses in relation to alternative sites for solar installation at ALT-01 (pg.8-9) in <b>WB8.1.19 Response to Written Representations at Deadline 1 Part 3 [REP3-036]</b> .

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			countryside is unjustified, unnecessary and there is certainly no national urgency for a paltry 0.15% of extra electrical generation. Solar is such a low yielding and poor performer it simply cannot be given the green light to waste all this farmland and industrialise the British countryside.	
SSk-06	Energy Need	Contribution to national energy requirements	An informed and bold decision needs to be made to slow down this planning free-for-all and give due consideration to the citizens of this country and not to the tiny electrical and the decarbonising contribution of ground mounted solar in the UK. The local opposition group (7000 acres) has a membership with over 300 years of power industry experience. Please listen to their experts, who are without a financial agenda.	The Applicant notes this comment and refers to its response SSk-01 above, in this document, in relation to the critical role the Scheme has in relation to helping deliver secure, low-carbon and affordable electricity supplies for the UK.
SSk-07	Principle of Development	Recommendations for ground-mounted solar policy	If at the end of this process the many harms remain unseen. Then in the national interest please seriously consider the following 5 points.  We do not create high impact 'Solar Industrialised Zones' in the UK countryside. Such as the disproportional 5 NSIPs covering over 13,000 acres proposed around Gainsborough. West Burton. Cottam. Gate Burton. Tillbridge and Steeple Renewables. They all fall within a 10km radius! With a sixth NSIP falling just outside, One Earth solar.	The Applicant notes this comment and refers to a previous response made in reference 7A-29 in <b>The Applicant's Responses to Relevant Representations [REP1-050]</b> .  The considerations taken into account when designing the Scheme are set out in <b>ES Chapter 5: Alternatives and Design Evolution [APP-043]</b> .

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>We do not foolishly use up all the high-power Grid connections with this rush of solar applications.</p> <p>We do not allow IGPs damaging 4.5m/15ft high solar panels into our landscape.</p> <p>We introduce fair exclusion zones around all residential property.</p> <p>And that BESS, which is a totally separate entity. Shall be located safely and sensibly on brownfield sites or adjacent to the Grid connection from where it will be charged.</p>	
SSk-08	Landscape and Visual Impact	Cumulative assessment	<p>I would like to also respond to the Applicants rebuttal at the end of the OFH2. Despite what the Developer says in their specialist's reports, the cumulative effect of the mass industrialisation of our countryside by 13,000 acres of solar development will destroy the area. This is clear to see by anyone without an agenda. The use of giant 4.5m infrastructure proposed for the Cottam and West Burton schemes could never be mitigated. The Sunnica scheme is causing concern for the SoS with panels of just half this size and the area has just one NSIP proposal, not five! The Gainsborough countryside would be getting the equivalent of 13 Longfield solar farms within a 10km radius! The hired Specialist are undeniably wrong in their</p>	<p>The Applicant refers to their previous responses in relation to cumulative impact on landscape character in <b>WB8.1.19 The Applicant's Responses to ExA First Written Questions at Deadline 3 [REP3-038]</b>.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			assessments and are clearly playing down the harms!	
SSk-09	Soils and Agriculture	Use of arable land	The Applicant mentioned "set aside". There is not 13,000 acres of "set aside" in this small area, and "set aside" is not set aside for 60 years as an industrial folly, it can return to agriculture at any time. Of the 13,000 acres of farmland being promoted for solar development, not one brownfield site or rooftop is being considered and nor will it be if the Developers are allowed to disregard planning legislation and take the easy option. Meaningful agriculture will cease to continue over much of this arable landscape.	Set aside was mandatory for arable land in the former arable area payment support scheme. In 2005 the UK began a transition from arable area payment to support payments in return for environmental goods and services. While the arable area payment support system was in place, 10% of set aside was mandatory. This represented a vastly greater area of arable land than the combined extent of UK solar farms. No harm resulted and meaningful agriculture clearly did not cease to continue.
SSk-10	Energy Need	Efficiency of solar	Regarding the Applicants response to my statement about solar on farmland being thought of as a good idea because people do not know the facts... Well, I doubt the general public or indeed most politicians know the truth about, in particular, ground mounted solar.  Do they know for example that the electrical generation is only around 11% of the installed capacity? Specifying that a site would provide 500MW of power is misleading. This refers to the peak power delivered under optimum conditions of the sun and at midday in the summer. Probably	The Applicant refers to their previous responses in relation to efficiency of solar energy at ALT-02 (pg.552-559) in <b>8.1.2 The Applicants Responses to Relevant Representations [REP1-050]</b> .



Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			never to be achieved! The power output or yield will be very much less than this for most of the time and of course falls to a guaranteed zero output during the hours of darkness.	
SSk-11	Energy Need	Efficiency of solar	<p>Do they know that about 2,500 acres are required for a 500MW (55MW) ground mounted solar scheme?</p> <p>Do they know the physical size of the solar panels being promoted here and the proximity to people's homes. This scale of industrialisation is never shown in promotional photographs.</p> <p>Do they know the land footprint of other generating technologies and their associated power outputs, for comparison? For example,</p> <p>Solar (ground mounted) 11% generation yield - 5 acres per 1MW installed.</p> <p>Offshore wind 50% (5x more) generation yield - no loss of farmland.</p> <p>Onshore wind 40% (4x more) generation yield - less than 1 acre per 3MW turbine. Meaningful agriculture can continue on the rest of the site.</p> <p>Nuclear 90% (9x more) generation yield - Sizewell C, 170 acres for 3,200MW and other clean thermal power plants of scale, having 80% energy yields and average footprints of just a few hundred acres.</p>	The Applicant refers to their previous responses in relation to efficiency of solar energy at ALT-02 (pg.552-559) in <b>8.1.2 The Applicants Responses to Relevant Representations [REP1-050]</b> .

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
SSk-12	Energy Need	Efficiency of solar	In summary, solar is a poor performer at a national level compared to other generation methods, but it does have a role to play in that its simple technology can be utilised on rooftops with relative ease, with most of the power produced going directly to the consumer and thus lowering Grid demand. An ideal situation of which I am absolutely sure is the preferred way to deploy this technology in the UK. Solar simply uses too much land for too little gain. Let us save the land for something that really needs it. Starting with feeding the nation?	The Applicant refers to their previous responses in relation to efficiency of solar energy at ALT-02 (pg.552-559) in <b>8.1.2 The Applicants Responses to Relevant Representations [REP1-050]</b> .
SSk-13	Alternatives and Design Evolution	Alternative locations	There is no Developer desire for rooftop solar generation, all is being promoted on farmland. Planning policy states brownfield must be prioritized. The Applicant is cherry picking policy. Renewable energies do not all offer equal benefit and should not override all other planning considerations. Which definitely do not condone a density of 13,000 acres of insensitive solar developments within a 6 mile radius.	The Applicant refers to their previous responses in relation to alternative sites for solar installation at ALT-01 (pg.8-9) in <b>WB8.1.19 Response to Written Representations at Deadline 1 Part 3 [REP3-036]</b> .
SSk-14	Alternatives and Design Evolution	Scheme layout and design	A multiple and fragmented site design is far more visually harmful than a single site. For example, visual impact could be in all directions on a fragmented site whereas a single site is more likely to only impact one direction and possibly only impact once while travelling through the area	Th Applicant refers to their previous responses in relation to Site layout and Landscape at reference LCC-21 in <b>The Applicant's Responses to Relevant Representations [REP1-050]</b> .

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			instead of passing many separate sites. All other solar NSIPs are on one contiguous site.	
SSk-15	Alternatives and Design Evolution	Site selection and Scheme elements	The land parcels that make up these multi-site schemes, are not site selection. It clearly shows what was offered by landowners at the time. 4.5m panels are not considerate to the landscape or the community and are not used in populated areas.	The Applicant refers to their previous responses in relation to Site selection and Landscape at reference SCA-08 in <b>The Applicant's Responses to Relevant Representations [REP1-050]</b> .
SSk-16	Alternatives and Design Evolution	Site selection and Scheme elements	Future Solar technology advancements should be used as a means of physical size reduction of the scheme and the easing of local visual impact etc...	The Applicant notes this comment and refers to a previous response referenced PRI-14 in <b>The Applicant's Responses to Relevant Representations [REP1-050]</b> .
SSk-17	General	Community benefits	Community benefit fund is an acknowledgment community harm.	The Applicant notes this comment.  The Applicant refers to previous responses made on community benefits at reference SIPC-23 of <b>The Applicant's Responses to Relevant Representations [REP1-050]</b>
SSk-18	Waste Draft DCO	Panel replacement and enforcement of DCO	Panel failure. No panel will last 60 years. 20-25 years is a normal life span due to severely depleted efficiency after this time. So, in practice, with failures some panels could be replaced twice in 60 years. All panels will need to be replaced at least once over 60 years. As a result of panel failures and replacements over the multiple schemes in the area the cumulative impact on waste would be untenable. The Applicant continually states that any breach to a DCO is a criminal offence. I do not	Based on current technology, the lifespan of the solar panels to be used for the Scheme is estimated to be approximately 40 years, with an estimated failure rate of 0.4% per year. This is shown in Table 20.6 of <b>6.2.20 Environmental Statement - Chapter 20 Waste [APP-058]</b> which identifies an estimated volume of replacement PV modules of 130 tonnes per annum, the vast majority (approx.

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			doubt this, but what deterrent is there for a large faceless company and on a site so big that no one will notice. If the penalty is a warning, a fine or a "slap on the wrist" then cutting a few corners will happen. It is not like there is life imprisonment for cutting a hedge too low? I hope you can see the very real policing issues on rural sites of this size and where hedges etc. are the only mitigation for these industrial eyesores.	95%) of which consists glass and metal frames, which are inert, and can easily be reused and recycled. However, it is considered possible 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.
SSk-19	General	Maintenance work	The power output of 11% of the installed capacity is best case scenario with no failures and perfect performing panels etc... It is likely to be much lower than this with predicted failures. Maintenance will be in a cost-effective manner and the loss of daytime generation is likely to be minimized by night time working, causing continued and further impacts on the community.	The estimated production figures quoted in paragraph 7.8.61 of <b>WB6.2.7_A ES Chapter 7 Climate Change Revision A [REP1-012]</b> already take into account a 99% availability. For maintenance or replacement purposes, a string of panels (usually consisting of 26-29 modules) can be isolated from the combiner box, enabling maintenance work while minimizing the need to switch off the inverter. Maintenance or panel replacement can therefore be completed with minimal disruption to the electricity being produced by the rest of the Scheme.  Section 2.4 of <b>WB7.14_C Outline Operational Environmental Management Plan – Revision C [REP4-054]</b> , which is secured by Requirement 14

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				of the draft DCO [EX4/WB3.1_E], describes working hours during the Scheme's operational phase and confirms that routine maintenance will be carried out as required Monday to Friday 07:00-18:00 with emergency maintenance carried out as and when needed.
SSk-20	Principle of Development	Ethical sourcing	The Applicant is constantly telling us what we want to hear. I.e. 50/50 China/Europe equipment sourcing. Should we be fueling the Chinese economy at all, when they are the words biggest carbon emitters. Hypocrisy?	<p>The Applicant refers to the response made at PRI-09 (pg. 675) in <b>8.1.2 The Applicant's Responses to Relevant Representations [REP1-050]</b> where matters relating to ethical sourcing, manufacturing, and skills and supply chains raised by the public have been addressed.</p> <p>The Applicant can confirm that no solar PV panel or BESS manufacturers or suppliers have been contracted as yet. The products referenced in the ES are therefore used for indicative purposes only for use in the assessment of environmental effects.</p>
SSk-21	Alternatives and Design Evolution	Alternative locations	As stated before, the Developer seems to support rooftop solar but evidently there is just no desire for it, just lip service paid. Not until every usable rooftop is used. Should we be turning to farmland, there is demonstrably very little need for massive ground mounted schemes. Solar output is so low that ground mounted should be in addition to	The Applicant refers to their previous responses in relation to alternative sites for solar installation at ALT-01 (pg.8-9) in <b>WB8.1.19 Response to Written Representations at Deadline 1 Part 3 [REP3-036]</b> .

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			rooftops not the other way round, but solar on farmland is the only type being promoted.	
SSk-22	Alternatives and Design Evolution	Site selection and Scheme elements	Heckington Fen solar farm reduced their panels from the unheard of 4.5m to reasonable height during consultation, they clearly listened to residents. Power from solar can be achieved in many, more acceptable and low impact ways, rather than terrorizing rural communities with infrastructure designed for deserts and wastelands.	The Applicant notes this comment.  The Applicant refers to their previous responses on Site Selection with reference WLDC-11 in <b>The Applicant's Responses to Written Representations and Other Submissions at Deadline 1: Part 1 [REP3-034]</b>
SSk-23	Principle of Development	BESS replacement rate	BESS. Batteries cycled daily would only last about 10 years, with the Applicant stating 12 to 20 years. This means the BESS could be replaced 4-5 times during the life of the current scheme. This is totally unfair on the community.	The Applicant refers to their previous responses in relation to battery replacement with reference ENE-04 in <b>WB8.1.23 The Applicant's Response to Deadline 2 and 3 Submissions [REP4-066]</b> .
SSk-24	Soils and Agriculture	Cropping methods	Much of the crop growing land around here is almost never ploughed, just harrowed. The Applicant has little local knowledge of farming practices.	There are many forms of cultivation tool and activity. Harrows (implements that exert a downwards force as they are drawn across and through the soil) include cultivators that perform different operations. A disk harrow will invert soil and incorporate surface material in a manner similar to a mouldboard plough – and may be used as a primary cultivation alternative to a plough. Other forms of harrow such as a spring tine and power harrows act to break up the larger soil

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				<p>clods left by the preceding primary cultivation. Were these to be used directly on a stubble without any preceding primary cultivation, they would have little to no practical effect. Therefore to simply claim that the land is harrowed rather than ploughed adds little information.</p> <p>A disk harrow works to loosen and invert the topsoil as part of a process of preparing a fresh seed bed after a preceding crop. In doing this it creates the conditions for a decline in soil health down towards a low equilibrium in exactly the same way as ploughing. Under a solar farm topsoil will not be cultivated by plough or harrow, and will have year-round growing plant cover, enabling a recovery of soil health back towards the higher equilibrium of grassland.</p>
SSk-25	Hydrology, Flood Risk and Drainage	Water retention by vegetation	The Applicant promotes the grass beneath the panels as a miracle cure for flooding, basically saying grass prevents flooding. An arable crop will take up water from Autumn drilling to the next Summer's harvest. Any living vegetation will absorb water and improve soil permeability. Not just grass beneath a solar panel. The experts agenda based narrative is blatant and misleading.	<p>The Applicant is not suggesting that grass prevents flooding.</p> <p>The proposed Scheme will change the existing use on the vast majority of the proposed area from active arable farm land to solar development which is improved with grassland planting.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				<p>Point 3 of paragraph 10.8.1 within <b>WB6.2.10 ES Chapter 10_Hydrology, Flood Risk and Drainage [APP- 048]</b> includes provision for suitable planting (such as a wildflower or grass mix) to ensure that the underlying ground cover is strengthened. The change in use, as suggested by the Applicant will ensure a mature ground covering which reduces soil erosion and maintains soil structure and fertility thus reducing surface runoff.</p> <p>Cyclical planting and tilling for agriculture leaves bare soil for parts of the year with loose top soil in areas (promoting erosion) and compacted soil where heavy machinery is used (decreasing the infiltration capacity of the soil).</p>
SSk-26	Soils and Agriculture	Agricultural practices	<p>The heavy and wet land in this area, as stated by the soil expert, would not be conducive to sheep welfare, areas for livestock need to be chosen carefully in this region, requiring frequent rotation. Hence this being an arable landscape, famed for growing cereals. Lincolnshire is after all "the Breadbasket of the UK." It is madness even to contemplate using arable land for sheep grazing. We already have enough grassland on poor, free draining soils in this country. Any meaningful agricultural practice would obviously cease on the</p>	<p>Sheep will not be on the land year round but brought to the site to graze when there is sufficient forage. Over winter when there is little to no forage growth, there will be no need to bring in sheep to control grass height, and no benefit in keeping the sheep within the Site .</p>



Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			WBSP. There is no requirement for an additional 2,500 or cumulative 13,000 acres of extra poor quality sheep grazing in this area. The notion of serious sheep farming should not be given weight here and using sheep as a tool to keep the brambles at bay is not a sheep farming enterprise.	
SSk-27	Soils and Agriculture	National policy on use of Grade 3b land	Land lost to solar here and across the country will be of catastrophic proportions, solar plants are not an appropriate use of land. The 3a BMV threshold is stated in planning policy and given serious consideration, but so is Brownfield site use and this seems to be given very little consideration? High quality 3b land is being ridden over roughshod. The loss of any arable land puts undeniable pressure on what remains.	Agricultural land is not lost to or degraded by the temporary solar farm development. Please also refer to the response to submission JPLPTA-09 in this document, which also concerns soil.
SSk-28	Hydrology, Flood Risk and Drainage  Soils and Agriculture  Climate Change	Use of agricultural land	With around half the UK's agricultural land located on flood plains which may be lost to permanent or intermittent flooding either by extreme weather events or by rising sea levels. It seems hypocritical to be wasting good farmland on solar and at the same time exacerbating local flooding issues with solar panels covering the size of a city. The solar panels would be like a metropolis of un-guttered rooftops with the concentrated rainwater falling straight to the ground. The flash flood risk would be compounded many times over, despite the Applicant stating that there would be gaps in the	The assessment of Climate resilience in <b>WB6.2.7_A ES Chapter 7 Climate Change Revision A [REP1-012]</b> has taken into account anticipated conservative estimates of the effect of Climate Change on localised flooding.  By maintaining a year round plant cover, rainfall infiltration to the soil will improve over that of cultivated land, reducing flood risk in that catchment.

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			panels to reduce this risk. I see no securing of this extraordinary gap in the DCO.	
SSk-29	Soils and Agriculture	Restoration of arable	Claiming that after 60 years the land could return to agriculture is nonsense. I doubt after six decades there will be a renewed need for agriculture. This will be classed as previously developed land with a Grid connection. I think we all know this land will be used for industry in perpetuity, in essence a very large brownfield site.	As per the response to JPLPTA-09 above, in this document, Defra R&D project LE0206 demonstrates that the restoration of agricultural land after open cast and landfill working is successfully achieved without loss of ALC Grade.
SSk-30	Cultural Heritage	Impacts on cultural heritage	A Responsible Developer would not jeopardize any cultural heritage.	The Applicant respectfully disagrees with this comment. The Cultural Heritage chapter of the Environmental Statement <b>[APP-051]</b> presents an assessment of the effects of the Scheme on cultural heritage and archaeology. Where likely impacts are found, mitigation measures are proposed and secured via requirement 12 in the draft DCO <b>[EN010132/EX5/WB3.1_F]</b> submitted at Deadline 5.
SSk-31	Transport and Access Noise and Vibration	Assessment of impacts	Transport issues are again played down by the Applicant. Stating that X number of extra vehicles will have no material effect is arrogant and just wrong. In the context of cumulative effect of several other projects in the area, when they all have X number of vehicles this issue could be compounded to an intolerable level. The applicant seemed to fail to grasp this basic concept. Mrs.	The Applicant re-iterates that Chapter 15: Noise and Vibration of the Environmental Statement <b>[APP-053]</b> concludes that, with the implementation of mitigation, no likely significant adverse effects are anticipated resulting from noise during the construction, operation and maintenance, and decommissioning of the Scheme. All

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>Warren was correct. Operational noise was a similar issue, and the cumulative effect could be significant. The Applicants response failed to answer cumulative noise concerns. Bearing in mind 4.5m tilting panels are not used in the UK and only abroad in desert like locations. Where I doubt noise from their operation, both mechanical and wind noise would be an issue there. Plus, the final equipment has not been chosen yet so how can the Applicant know the noise output of their development?</p>	<p>assessments have been undertaken with plant operating at 100% capacity and therefore representing the worst-case scenario. In reality, noise levels as a result of the Scheme will generally be lower than those predicted. Noise impact has been assessed in accordance with current British Standards.</p> <p>In transport terms, the effects of the construction phase of the scheme, including the cumulative effects, are set out in the <b>6.2.14 Environmental Statement - Chapter 14_Transport and Access [APP-052]</b> and <b>C6.3.14.1_A ES Appendix 14.1 Transport Assessment [EN010132/EX4/WB6.3.14.1_C]</b>. Management measures are set out in the <b>outline Construction Traffic Management Plan (oCTMP) [EN010132/EX4/WB6.3.14.2_E]</b>, which is secured by Requirement 15 in the draft DCO <b>[EN010132/EX5/WB3.1_F]</b> submitted at Deadline 5</p> <p>As set out in the <b>6.2.14 Environmental Statement - Chapter 14_Transport and Access [APP-052]</b>, likely effects will be temporary and minor in nature based on</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				<p>the assessment criteria set out by the Institute of Environmental Management and Assessment (IEMA).</p> <p>Please see the response to Action 1 on p12 of <b>WB8.1.27 Written Summary of the Applicant's Oral Submissions &amp; Responses at Issue Specific Hearing 3 and Responses to Action Points [REP4-070]</b> for details of where other operational sites using tracking panels can be found, that aren't in desert locations.</p>
SSk-32	Human Health and Wellbeing	Assessment of health impacts	<p>A Planner at Lanpro commenting on health issues is surely a joke. I failed to understand the direction of his argument which seemed to be that there would be no health impact of having your home and standard of living devalued due to industrialised development and a land use and landscape change on a scale never seen before. The health impact would, in reality be enormous! A cumulative 13,000 acres of solar within a 6 mile radius would make this scheme part of the Largest solar complex in the developed world. Other developments of this size are in uninhabited parts of the world. British citizens are being terrorized by Net Zero fueled and opportunistic solar Developers and their Government lobbyists. Shameful. Would</p>	<p>The professional ability, background, and level of experience of the chapter authors and supporting team at Lanpro is set out in <b>WB6.3.1.1 Environmental Statement - Appendix 1.1 Statement of Competence [APP-062]</b>.</p> <p>The Applicant refers to matters discussed on the topic of human health and wellbeing as summarised and addressed at Agenda item 5 in <b>WB8.1.28 Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 4 and Responses to Action Points [REP4-071]</b>.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			they like to live within one of the largest solar complexes in the world? No, they would not!	
SSk-33	Socio-economics, Tourism and Recreation	Assessment of employment impacts	Socio-economic decline of the area is a given, due to low skilled and low paid work, being all that is offered by these proposals. Transient and imported labour during construction has no link to sustainable local benefit, it will more likely cause harm due to the overwhelming of local services etc... West Burton power station employed nearly 1000 full time staff for 60 years with high paid and skill careers. Agricultural jobs, over a cumulative 13,000 acres would be lost forever. Solar schemes have low permanent employment, and these low skilled jobs would clearly be shared across the many schemes in this Solar Industrialised Zone. See previous map.	<p>The Applicant refers to their previous responses in relation to employment from the Scheme at 7A-155 (pg.143-145) in <b>WB8.1.18 Response to Written Representations at Deadline 1 Part 2 [REP3-035]</b>.</p> <p>The Applicant refers to their previous responses in relation to cumulative employment and economic impacts from the cumulatively assessed projects in <b>WB6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP 056]</b> at 7A-06 (pg.142-147) in <b>WB8.1.2 The Applicants Responses to Relevant Representations [REP1-050]</b>.</p>

Victoria White [REP4-118]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
VWh-01	Principle of Development	Cumulative Effects	<p>This is one of several applicants impacting a vast area of land. I have not been able to access all the information but I am very concerned about the huge detrimental impact on the areas targeted by these solar projects. The local area is being consistently targeted by various applicants who show no regard for the impact on land and life. The cumulative effects will devastate Lincolnshire and surrounding areas for no real nett gain. It is not right to takeover in such ways and leave an inefficient high maintenance solar program. A legacy to fall on future generations to clear up as best they can with pollution and prevention of life for so many people and animals for decades and beyond. It is completely irresponsible to go ahead with these projects. Alternative ways are available for energy and working towards carbon neutral. Please prevent disaster both now and in the future.</p>	<p>The Applicant notes this comment.</p> <p>The Applicant refers to a previous response discussing the need for such schemes at 7A-32 (Pg 182) <b>WB8.1.2 The Applicants Responses to Relevant Representation [REP1-050]</b>.</p>

William Rose [REP4-119]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
WRo-01	Principle of Development	Objection in principle	I have farmed at [redacted] have lived there for the past fifty-six years; I Along with most other people here, I can think of better places to be, than in front of this microphone. But I felt I must stand up to these monstrous proposals. I will never be able to look my children or Grandchildren in the eye if I haven't tried to do something to stop this.	The Applicant notes this comment.
WRo-02	Planning Policy Landscape and Visual Impact	National policy and landscape impact	<p>The applicants will say they are following Government policy, they may well be, but it doesn't make it right. The whole strategy of looking for solar to generate 70Gigawatts of electricity by 2035 is flawed. This scale of output will need the sacrifice of at least 70,000 hectares of farmland. This is a shocking figure which I suppose the applicants, from their ivory towers, will pass off as a drop in the ocean. How can it be sensible policy to take this huge area from the finest food producing county. I have spent my whole life trying to follow the old dictum, of leaving my land in a better state than when I took it over. I have planted woods, miles of hedgerows, created ponds, all to enhance the environment around me. I am absolutely appalled that these proposals are being put forward.</p> <p>You, as adjudicator over these events must look at the bigger picture, we are not faced with this one project, but many. Our rural landscape will be changed for generations to come.</p>	The Applicant refers to their previous responses in relation to impact on landscape character and visual amenity in Questions LAN-01,LAN-02 and LAN-05 <b>WB8.1.19 The Applicant's Responses to Written Representations and Other Submissions at Deadline 1 Part 3 [REP3-036].</b>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
WRo-03	Planning Policy  Landscape and Visual Impact	National policy and landscape impact	Solar on roof tops as part of the mix of renewable energy is not a problem. The problem is the condemning of vast areas of farmland to become an industrial landscape. This is an ill-thought-out government policy which doesn't care about the long-term effects which it surely will have. The cumulative visual effect of such a large area of solar panels on our rural landscape is hard to comprehend. This has never been done before. There can be no doubt that our outlook will be blighted as far as the eye can see. You will be destroying the landscape, which generations of our forebearers have toiled to create. All for the sake of profit for some faceless multinational company. The sheer scale of this project is immense; it will have a huge effect in many areas -	The Applicant refers to their previous responses in relation to cumulative impact on landscape character in <b>WB8.1.21 The Applicant's Responses to ExA First Written Questions at Deadline 3 [REP3-038]</b> .
WRo-04	Soils and Agriculture	Land grading and food security	The land under proposal is Grade 3, it is penny pinching to say 'A' or 'B' and is currently used for food production. As farmers we are being encouraged by the same Government which has dictated that solar farms are the way forward, to become more environmentally friendly, this will result in many acres of good land being set aside to grow not food, but flowers and herbal leys. We have a war in Europe with problems of supply. We should be focusing on growing more food in the UK, not less. The landscape will be changed for 60 years and may never be returned to farmland again.	The Applicant refers to their previous responses in relation to food security at LCC-21 (pg.16) in <b>WB8.1.17 Response to Written Representations at Deadline 1 Part 1 [REP3-034]</b> and SOI-01 (pg.703-706) in <b>8.1.2 The Applicants Responses to Relevant Representations [REP1-050]</b> .



Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
WRo-05	Ecology and Biodiversity	Construction access	The machinery and manpower needed to construct these farms will destroy indigenous species of wildlife, insects, birds, trees, and plants. Miles of hedgerows will be ripped out.	The Applicant refers to their previous responses in relation to removal of hedgerows for construction works. Please refer to WLDC-32 in <b>WB8.1.17 Response to Written Representations at Deadline 1 Part 1 [REP3-034]</b> .
WRo-06	Socio-economics, Tourism and Recreation	Recreational use of PROWs	As for public access, I'm not sure I want to walk through thousands of solar panels	The Applicant notes this comment and point the party to the commitments made in the <b>WB7.3_D Outline Landscape and Ecological Management Plan - Revision D [REP4-044]</b> , which is secured by Requirement 7 of the draft DCO <b>[EX5/WB3.1_F]</b> , and corresponding <b>ES Figures 8.18.1-8.18.3 Landscape and Ecology Mitigation and Enhancement Plans [REP1-026, REP1-027, and REP1-028]</b> .
WRo-07	Health and Wellbeing	Impact on health	The effect to the community's mental and physical health will be immense, People have lived in these communities for many generations. Currently, it is a peaceful, quiet, rural area. As a solar 'farm' it will become a vast industrial site with no access to footpaths, the countryside as we know it, will disappear. Just the planning process of these proposals has caused a huge amount of stress, worry and depression. That's just the planning process!	Mental and physical health and wellbeing  The Applicant notes this comment and refers to matters discussed on the topic of human health and wellbeing as summarised and addressed at Agenda item 5 in <b>WB8.1.28 Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 4 and Responses to Action Points [REP4-071]</b> and to responses made to 7000 Acres extensive commentary on human health and wellbeing in Section 2.9 of <b>WB8.1.18 Response to Written</b>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				<p><b>Representations at Deadline 1 Part 2 [REP3-035].</b></p> <p>The Applicant confirms that <b>WB8.4.21.1 Environmental Statement - ES Addendum 21.1: Human Health and Wellbeing Effects [REP4-077]</b> has been submitted to the examination to provide a greater level of detail of the consideration of human health and wellbeing undertaken in the ES.</p>
WRo-08	<p>Alternatives and Design Evolution</p> <p>Climate Change</p> <p>Waste</p>	Environmental impacts from battery production and disposal	Battery storage – The scale of land required for this is huge. The implications of living near this facility will affect the mental health and general lives of people living in the area. There must be environmental problems just in the manufacture of these batteries, let alone their disposal.	<p>The Climate Change assessment <b>WB6.2.7_A ES Chapter 7 Climate Change Revision A [REP1-012]</b> has considered emissions generated by production of the batteries required for the development. The conclusion of the chapter is that these emissions and other embodied carbon from construction of the development would be offset by the carbon savings from operation of the development compared to non-renewable sources.</p> <p>The handling, recovery, recycling, or disposal of end-of-life batteries will need to be undertaken in accordance with the Waste Batteries and Accumulators Regulations 2009 (or relevant legislation at the point of disposal). This is most likely to be undertaken by the battery manufacturer or supplier.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
WRo-09	Transport and Access	Construction traffic impacts	These are vast schemes, requiring vast logistical issues. The road infrastructure just isn't capable of coping with the amount of heavy traffic which these schemes will generate. The small villages in our area will be blighted by the procession of heavy goods vehicles. The impact on the community will be life changing.	In transport terms, the effects of the construction phase of the scheme, including the cumulative effects, are set out in the <b>WB6.2.14 Environmental Statement - Chapter 14_Transport and Access [APP-052]</b> and <b>WB6.3.14.1_C ES Appendix 14.1 Transport Assessment Revision C [REP4-036]</b> . Management measures are set out in the <b>outline Construction Traffic Management Plan (oCTMP) Revision D [REP4-038]</b> .  As set out in the <b>WB6.2.14 Environmental Statement - Chapter 14_Transport and Access [APP-052]</b> , likely effects will be temporary and minor in nature based on the assessment criteria set out by the Institute of Environmental Management and Assessment (IEMA)
WRo-10	Alternatives and Design Evolution	Alternative renewable energy sources	The advent of mini nuclear power stations will render schemes like these obsolete. In fact, by reserving grid connection for solar it might hold up their development.	The Applicant refers to their previous responses in relation to alternative renewable energy technology at ALT-02 (pg.10-11) in <b>WB8.1.19 Response to Written Representations at Deadline 1 Part 3 [REP3-036]</b> .
WRo-11	Landscape and Visual Impact	Impact on landscape character	If these schemes are allowed to go ahead, you consign a vast area of rural England to an industrial, soul less wilderness, you will have changed our countryside forever. I would urge you to halt these proposals, it will	The Applicant refers to their previous responses in relation to cumulative impact on landscape character in <b>WB8.1.19 The</b>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			be your legacy to the people who live in this area if you allow these proposals to go ahead.	<b>Applicant's Responses to ExA First Written Questions at Deadline 3 [REP3-038].</b>

### 3 Applicant's Responses to Deadline 4A Submissions

#### 3.1 Submissions by Host Planning Authorities

North Lincolnshire Council [REP5-001]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
NCC-01			I can confirm that NLC has no comments or objections to raise in respect of this project. The proposed development as amended is not likely to result in any significant impact upon North Lincolnshire.	The Applicant notes this comment.

### 3.2 Submissions by 7000 Acres

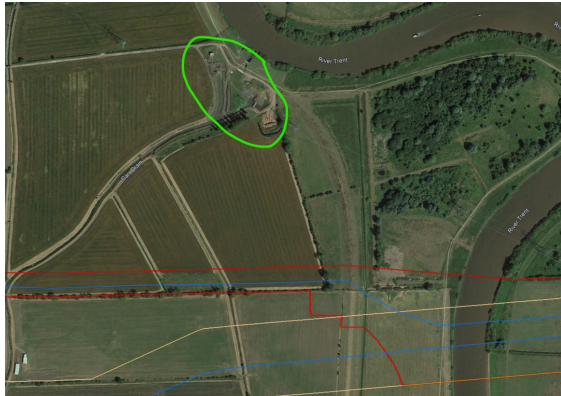
#### 7000 Acres [AS-064]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
7A-52	Landscape and Visual Impact Impact on ecology	Impact on landscape character Impact on ecology	<i>[Video describing the environmental impacts of the Cleve Hill Solar Park]</i>	The Applicant notes that this video relates to Cleve Hill Solar Park in Kent, which is not related to the Scheme.

### 3.3 Submissions by Parish Councils and Statutory Bodies

#### Environment Agency [REP5-002]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
EA-01			<p>The proposed extension to the development scheme now passes very close to or even above an authorised landfill site.</p> <p>This is on sheet 7 of 10 of the Land Plan Revision B (January 2024)(Document CR1/WB2.2_B).</p> <p>The details of the landfill site as are follows:</p> <ul style="list-style-type: none"> <li>• West Bank of River Trent British Waterways, ref: EA/EPR/AP3297FZ, category A06 Landfill taking other wastes, NGR SK8270581479.</li> </ul> <p>The developer must ensure that effects from and to this landfill are considered in the development of the scheme. Any interactions with the landfill must be discussed with the operator of the permit.</p> <p>In addition, applicable to the whole scheme, the developer needs to be aware that no discharges, other than uncontaminated surface water, may be discharged to either surface or groundwater without the benefit of an environmental permit. Measures should be considered to minimise the risk of pollution, particularly relating to sedimentation of surrounding watercourses.</p>	<p>Change 4 (Visibility splay at West Burton Cable Route Corridor Access AC110) is located on High Street, Marton, approximately 600 metres to the east of the east bank of the River Trent <b>[AS-056]</b>. The landfill site referred to is located on the west bank of the River Trent. The Applicant does not consider that this change is likely to affect the landfill site.</p> <p>The Applicant highlights the ongoing discussions with the Environment Agency within <b>8.3.5 Statement of Common Ground - Environment Agency DRAFT [REP1-065]</b> with regards to permitting (<b>HFD-11</b>).</p> <p>The Applicant acknowledges that no discharges, other than uncontaminated surface water, may be discharged to either surface or groundwater without the benefit of an environmental permit.</p> <p>No formal discharges are proposed for the panelled areas. The substation and BESS area within the Scheme is considered within an area specific drainage strategy included within <b>Section 3.0 of 6.3.10.5 Environmental</b></p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>These apply both during the development and operational phases of the proposal.</p>	<p><b>Statement - Appendix 10.5 FRA DS West Burton 3 [APP-093] as stated in section 3.4 Drainage Hierarchy:</b> 'The nearest watercourse is an unnamed land drain which runs to the east of the substation and battery storage area' it is proposed to discharge to this land drain which is a minor watercourse and therefore the appropriate land drainage consent will be sort from the LPA.</p> 



National Highways [REP5-003]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
NH-01			<p>We have considered the additional plan as highlighted in the consultation documents and we do not believe that this will impact National Highways network or assets.</p> <p>As such, I can confirm that our response is unchanged from our previous responses with respect of West Burton Solar Project.</p>	The Applicant notes this comment.

Network Rail Infrastructure Limited [REP5-004]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
NR-01			<p>As previously mentioned in the Written Representations, the application includes provisions which would, if granted, authorise the Applicant to carry out works on and in close proximity to operational railway land in the control of Network Rail, to use such land temporarily and to acquire permanent interests in such land.</p> <p>In addition to the submission made in Network Rail's Relevant Representation and Written Representation, the following plots of land are now identified as being as owned by Network Rail or having Network Rail Apparatus in situ, and are plots in which compulsory acquisition powers are being sought:</p> <p>[...]</p> <p>(together, the Plots).</p> <p>The Applicant is seeking, through compulsory purchase (Compulsory Powers), the permanent acquisition of rights and/or temporary use of land over all Plots.</p> <p>Network Rail objects to the use of Compulsory Powers and temporary powers over the Plots to deliver the development to be authorised by the DCO.</p> <p>Network Rail continues to investigate the extent of the risks to its assets and is liaising with the Applicant in relation to any mitigation required and it is anticipated</p>	<p>The Applicant has included protective provisions (PPs) for the benefit of Network Rail in Part 10 of Schedule 16 to the draft <b>Development Consent Order [EX5/WB_3.1_F]</b>. These PPs are based on Network Rail's standard PPs. The Applicant is confident that, prior to the close of the Examination, agreement will be reached on the protective provisions in the same form as have been agreed for the Cottam Solar Project.</p> <p>Discussions with Network Rail relating to the Framework Agreement, protective provisions and property agreements are ongoing, which includes discussion relating to the implications of the Applicant's Change Application.</p> <p>Please also refer to the Applicant's responses to Second Written Questions 2.4.12 and 2.5.18 <b>[EX5/WB8.1.34]</b>.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>that this will continue during the remainder of the examination process. In order for Network Rail to be in a position to withdraw its objection to the making of the DCO, it will require the following matters to be concluded and secured to its satisfaction:</p> <ol style="list-style-type: none"> <li>1. Network Rail requires its standard protective provisions to be included within the DCO to ensure that its interests are adequately protected and to ensure compliance with the relevant safety standards. As at the date of these Additional Written Representations discussions are still ongoing with the Applicant in regards to the protective provisions.</li> <li>2. Network Rail requires the completion of a framework agreement to regulate the manner in which rights over railway property are to be granted and in which works are to be carried out in order to safeguard Network Rail's statutory undertaking. Engineers for Network Rail are still continuing to review the extent of impacts on operational railway and Network Rail's property and any mitigation required (including Network Rail's review and prior approval of the design proposals for the parts of the DCO scheme which interface with the railway at detailed design and construction stages) will be considered in this agreement. A draft framework agreement is currently undergoing discussion.</li> </ol>	

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>Network Rail and the Applicant continue to be in discussions about the effects of the DCO in general and will continue to liaise to address all outstanding matters.</p> <p>Until satisfactory agreement has been reached with the Applicant on all matters to Network Rail's satisfaction, Network Rail will not be in a position to withdraw its objection to the making of the DCO. Network Rail reserves the right to be heard at an appropriate hearing to explain in detail the impacts of the scheme on its operations</p>	

United Kingdom Atomic Energy Authority [REP5-005]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
UKAEA-01			<p>Whilst UKAEA is willing to work with the Applicant to explore the potential for a voluntary agreement by which the rights or powers required are granted to the Applicant on a voluntary basis by the existing freehold owner EDF in a manner consistent with the UKAEA interest in land, no such agreement has yet been proposed by the Applicant. Given the future intended use of the West Burton site by UKAEA for its STEP programme, it is essential that the site is not fettered by permanent third party rights of the sort being proposed by the Applicant. UKAEA would have no objection in principle to the grant of voluntary easements over land subject to:</p> <ul style="list-style-type: none"> <li>a) Appropriate time limits where they relate to the exercise of access rights associated with the construction of the Project; and</li> <li>b) "lift and shift" provisions which would enable UKAEA to require the Applicant to relocate (without detriment to the Applicant's Project) its cable route which is proposed to cross the West Burton site in order to access the onsite substation.</li> </ul> <p>The terms of any agreement are also likely to include a requirement for the inclusion of protective provisions for</p>	<p>The Applicant notes these comments and notes that the UK AEA has the benefit of an Option Agreement over land currently owned by EDF at West Burton Power Station. Discussions between the Applicant and EDF for the necessary property agreements are ongoing.</p> <p>The Applicant respectfully disagrees with UK AEA's statement that the compulsory acquisition and temporary possession powers sought in the DCO are not reasonable, necessary and proportionate, and is engaging proactively with UK AEA. The Applicant is confident that the UK AEA's development proposals for West Burton Power Station can co-exist with the Scheme.</p> <p>Draft protective provisions for the protection of UK AEA have been sent to UK AEA for comment. The final draft DCO submitted at Deadline 6 will either include agreed protective provisions or, in the event they are not yet agreed, the Applicant's preferred version.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>the benefit of the UKAEA within the draft DCO, to ensure that any powers are exercised consistently with the UKAEA interest in the site, including compliance with relevant standards for works proposed, future access arrangements and safeguarding.</p> <p>The UKAEA notes that discussions have been initiated with the Applicant in relation to a potential voluntary agreement.</p> <p>The UKAEA therefore objects to the proposed exercise of compulsory acquisition (CA) and / or temporary possession powers (TP) over its land at West Burton as affect by the Project.</p> <p>The UKAEA's position is that the Applicant's request for permanent powers of compulsory acquisition of rights are not reasonable, necessary and proportionate given UKAEA's willingness to reach voluntary agreement in respect of both permanent and temporary rights. The acquisition of such powers also has the potential to interfere with the UKAEA's proposals for the West Burton site, and the UKAEA's statutory functions.</p> <p>In the alternative, in the event that the Secretary of State is minded to approve the Order in the form promoted, the UKAEA seek protective provisions in relation to the compulsory acquisition powers sought and how they are</p>	

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>exercised, so as to prevent detriment to the UKAEA in carrying out its statutory functions.</p> <p>Given the late introduction of compulsory purchase powers affecting the UKAEA land interests (and the late identification of the UKAEA as a party with an interest in that land), the UKAEA reserves its ability to revisit the position outlined in this representation as it continues to assess the Applicant's proposals.</p>	

**Broxholme Parish Meeting Solar Group [REP5-007]**

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
BPMSG-01			<p>PROPOSED ACCESS ROUTE TO WB1</p> <p>The residents of Broxholme (via the Solar Group mandated at the Parish Meeting) are terrified at the prospect of the proposal to putative access to WB1 by widening Main Street (from the A1500) if the project goes ahead.</p> <p>This is a narrow rural track which cannot cope with any degree of widening. The verge churn as it is makes the lane a mud strewn carriageway. The token gesture of adding "passing places" is not a solution. If WB1 goes ahead find another access route that does not deface our egress from the hamlet. There is only one other way out of Broxholme hamlet. This stretch of lane is used by dog walkers, cyclists, ramblers and residents taking exercise. It is suggested that this would be "temporary". The reality is that the rural lane will be permanently industrialised.</p> <p>A farm on Main Street has just has planning permission denied for the making of a new access point across the verge adjacent to the farmyard as not being in keeping with the lane. If this is the case how could the industrialising of the rest of Main Street be appropriate?</p>	<p>Please refer to the response to BPM-03 provided above.</p>



### 3.4 Submissions by Affected Persons, Interested Parties and other Members of the Public

Alan Barber [REP5-006]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
AB-01			This will destroy all the farming land, nothing will be able to be grown on the farming which have a major impact on the economy and economic growth for the country, it will make the village look a site for sore eyes, will cause house prices to go down so when people want to sell their homes they will loose out to, it isn't great for the community and the health of its residents.	In relation to the impact on agricultural employment, please refer to the Applicant's responses at references STR-01 and STR-02 within <b>WB8.1.19 Response to Written Representations at Deadline 1 Part 3 [REP3-036]</b> .  In relation to the impact on the health of residents, please refer to <b>ES Addendum 21.1: Human Health and Wellbeing Effects [REP4-077]</b> .

Philip Hodgkinson [REP5-008]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
PH-01			Further to my earlier submission, further proposals are coming forward covering 13000 acres with an industrial landscape within a 6 mile radius, this is cumulative impact. Can the Inquiry confirm how it plans to decide how the cumulative impact is to be decided if each Inquiry stands as a discrete decision, but has to be considered in the round?	Please refer to the Applicant's response to comment reference 7A-01 above.
PH-02			Secondly , why has the Inquiry allowed the applicant to make a late material change , which adds to the detrimental effect on the village with the widened service routes.	<p>The Applicant has set out in detail the reasons for making the Change Application in the Change Application and Consultation Report [AS-056]. This sets out that the changes were identified following discussions with key statutory undertakers and stakeholders.</p> <p>The Change Application is accompanied by a Supporting Environmental Information Report (SEIR) [AS-057] that considers the conclusions of the Environmental Statement ([APP-038 to APP-061, REP1-012 and REP3-010]) in relation to the proposed changes, and in particular whether there are any changes to potential significant effects compared to those reported in the Environmental Statement submitted with the DCO application. The SEIR concludes that there are no new or different likely significant</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				<p>environmental effects as a result of the 5 proposed changes.</p> <p>The Examining Authority exercised its discretion to accept the Applicant's Change Application request on 1 February 2024 [PD-011]. The ExA concluded that the changes do not substantially alter the substance of the scheme applied for and that accepting them would not result in a materially different project. As such the changes and their effects have been incorporated into the examination of the Scheme.</p>

Catrin Fieldson [AS-065]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
CF-01			<p>I do not know what Governmental incentives exist that gives so many "players" the confidence to apply to place solar panels on farmland and I do not understand why such ill conceived profit -based proposals are assigned to national infrastructure status.</p> <p>We can all agree the need for green energy but not at any cost and not without first, the highest scrutiny on who is applying, how will they manage the schemes, what the carbon footprint will be at the production and decommission stages, how much green energy will be produced, who for and who will be affected? As the cost will be too much for those affected to bear, your role in this is crucial.</p> <p>There are now about 27,000 acres of Lincolnshire farmland supposedly "up for grabs" for solar development and this figure is growing. As a small family farm at the heart of it all, we were recently approached by yet another "player" looking for another 500 acres to infill between the larger developments already under consideration.</p> <p>Such rampant greed and opportunism must be stopped in its tracks. Surely lessons have been learned that the private sector rarely delivers social results as its sole purpose is to make huge profits. Any "environmental" or</p>	<p>The environmental impacts of the Scheme has been assessed in the Environmental Statement <b>[APP-039 to APP-061]</b>.</p> <p>In relation to the carbon emissions from the Scheme, please refer to response reference CWa-05 within this document.</p> <p>In relation to the impact on agricultural employment, please refer to the Applicant's responses at references STR-01 and STR-02 within <b>WB8.1.19 Response to Written Representations at Deadline 1 Part 3 [REP3-036]</b>.</p>

			<p>social consequences will most certainly be played down and the impact, as always, will never be theirs to bear.</p> <p>Permission to proceed will mean the end of the countryside as we know it, along with the livelihoods of those trying to make a living in it. There has to be another way, a better more sustainable way of capturing the sun's energy than covering 30,000 acres of countryside and bringing to an end the pleasure, leisure and wellbeing even simple fields can bring to those who live and visit the open country</p>	
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