

# West Burton Solar Project

## The Applicant's Response to Deadline 5 Submissions

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## Issue Sheet

Report Prepared for: West Burton Solar Project Ltd.  
Examination Deadline 6

### Applicant's Response to Deadline 5 Submissions

**Prepared by:**

Name: Stephen Flynn

Title: Senior Planner

**Approved by:**

Name: Jane Crichton

Title: Associate Director

Revision	Date	Prepared by:	Approved by:
original	30 Apr 2024	SF	JC

## **1 Introduction**

- 1.1.1 This report provides the Applicant's responses to matters raised in submissions made at Deadline 5 on 11<sup>th</sup> April 2024 and any other additional submission accepted by the Examining Authority in the period immediately preceding Deadline 5.
- 1.1.2 Section 2 of this report provides the Applicant's comments on responses to the Examining Authority's (ExA) second written questions, issued on 19th March 2024 **[PD-014]**. The structure of the second written questions is maintained, with comments grouped with following topics:
- General and cross-topic questions
  - Agriculture and Soils
  - Biodiversity and Ecology
  - Compulsory Acquisition, Temporary Possession and Other Land or Rights Considerations
  - Draft Development Consent Order (DCO)
  - Health and Wellbeing
  - Historic Environment
  - Landscape and Visual
  - Need, the electricity generated and climate change
  - Noise, Vibration and Air Quality
  - Other planning matters
  - Safety and Major Incidents
  - Socio-economics Matters
  - Transport and access, highways and public rights of way (PRoW)
  - Water Environment including Flooding
- 1.1.3 Section 3 provides comments from the Applicant on other submissions made at Deadline 5.
- 1.1.4 Additional Submissions which were accepted at the discretion of the Examining Authority have been set out in Section 4.

## 2 Applicant Comments on Responses to the ExA's Second Written Questions

Ref	ExA FWQ's	Respondent	Question	Response	Applicant's Comment
<b>2.1 General and Cross-topic Questions</b>					
GC-01	2.1.1	Lincolnshire County Council (LCC) <b>[REP5-042]</b>	<b>Revised National Planning Policy Framework</b> The Revised National Planning Policy Framework (NPPF) was published in December 2023. All parties are invited to comment on the implications of any changes made the consideration of the proposed development.	Paragraph 180 (b) of the December 2023 NPPF retains the same policy approach as its predecessor by advising that planning policies and decisions should contribute to and enhance the natural and local environment by recognising the economic and other benefits of the best and most versatile agricultural land. However in the December 2023 version of the NPPF the newly introduced footnote 62, albeit in relation to planmaking, advises that 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. It is the Council's view that this is an additional test that the decision maker needs to take into account when assessing the developments impacts on the loss of any agricultural land that could be used for food production. It also brings into question the assertion of the applicant from Chapter 19 Soils and Agriculture that the impact is concluded as being a 'significant beneficial' effect despite the scope and availability of land for the production of food being reduced which in the Council's view is contrary to the revised NPPF and certainly cannot be assessed as 'significant beneficial.'	<p>Please refer to the Applicant's response to question 2.1.1 in <b>WB8.1.34 The Applicant's Response to ExA's Second Written Questions [REP5-039]</b></p> <p>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>.</p> <p>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>As set out in <b>WB6.3.5.1 ES Appendix 5.1 Site Selection Assessment [APP-071]</b>, selection of the Site accounted for agricultural land classification. Paragraph 3.3.30 states that the Scheme maximises the utilisation of low grade, non best and most versatile (BMV) agricultural land with 73.76% of the land being classified as non BMV land. The land required for the Scheme has been demonstrated within <b>WB6.3.5.1 ES Appendix 5.1 Site Selection Assessment [APP-071]</b> to perform better than 3 of the assessed Potential Development Areas (PDAs) and equal to the remaining one following the site selection process. Consequently, it has been concluded that there are no obviously more suitable locations for the Scheme within the Search Area.</p>
GC-02	2.1.1	West Lindsey District Council (WLDC) <b>[REP5-047]</b>	<b>Revised National Planning Policy Framework</b> The Revised National Planning Policy Framework (NPPF) was published in December 2023. All parties are invited to comment on the implications of any changes made the consideration of the proposed development.	<p>WLDC considers the NPPF to be an important and relevant consideration in the determination of NSIP projects under section 105 of the PA2008. Significant weight should be given to the NPPF, particularly in relation to matters that are of equal importance regardless of the capacity of a project (i.e. whether they are to be determined under the TCPA 1990 or the PA2008).</p> <p>WLDC wishes to draw attention to footnote 62 of the NPPF published in December 2023, which states that <i>"The availability of agricultural land used for food production should be considered alongside other policies in this Framework, when deciding what sites are most appropriate for development."</i></p>	<p>Please refer to the Applicant's response to question 2.1.1 in <b>WB8.1.34 The Applicant's Response to ExA's Second Written Questions [REP5-039]</b>, response to WLDC-25 in <b>WB8.1.31 The Applicant's Response to Deadline 4 and Deadline 4a Submission [REP5-038]</b> and response to GC-01 above.</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</p>

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				<p>Footnote 62 should be read in conjunction with paragraph 2.10.11 of NPS EN-3 which states that "The Powering Up Britain: Energy Security Plan states that government seeks large scale ground-mounted solar deployment across the UK, looking for development mainly on brownfield, industrial and low and medium grade agricultural land. It sets out that solar and farming can be complimentary and through shared use of land and encourages deployment of solar technology that delivers environmental benefits, with consideration for ongoing food production or environmental improvement."</p> <p>A key link between the two policy requirements is that applicants must demonstrate that the extent to which agricultural land used for food production will be 'available' in the event solar farm development is implemented. Demonstrating 'availability' is essential to meeting the policy expectation of such projects that, at the very least, demonstrate a 'consideration' for ongoing food production.</p> <p>Demonstrating 'availability' goes beyond simply stating that such activities 'could' occur alongside a proposed solar farm development. The policy test is not a theoretical consideration, but a practical one that requires application to genuinely seek to accommodate agricultural activity for food production alongside operational solar farms.</p> <p>It is clear from the application documents that no efforts have been and no mechanisms are in place to allow the land within the order limits to be used for the production of food. The applicant states that the land 'could' be used for such purposes, but such comments do not demonstrate any genuine commitment to delivering co-use and therefore carry no weight whatsoever.</p> <p>In order to demonstrate compliance with the NPPF and NPS EN 3, the applicant is required to demonstrate that they have considered the areas of land where dual-use 'can' be achieved and to identify mechanisms to enable these deemed compatible uses to co-exist.</p> <p>The applicant has provided no information on whether they have investigated whether there is interest in the agricultural sector to operate alongside the solar farm, and there is no mechanism in the dDCO that requires them to make any such efforts should consent be granted.</p> <p>The applicant states that impacts upon ongoing agricultural operations have been minimised through the use of appropriate design solutions (Planning Statement, Appendix D, p.66), however this is clearly not the case as no attempts have been made to facilitate and enable agricultural operations within the significant areas that host solar panels.</p> <p>The applicants case for causing such harm over a significantly wide area, is that the scale of the project (and subsequent loss of a significant area of agricultural land for the production of food) is underpinned by it being "required in order to</p>	<p>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>

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				<p>provide the 480MW of electricity generation allowed via the grid connection offer from the National Grid." (Planning Statement, Appendix D, p.28). This reveals the fundamental flaw in the design approach taken by the applicant to the project as a whole and their justification for its significant adverse impacts. The capacity of the connection offer provided by the National Grid is not a design parameter that must be achieved. It has no weight on the design of an energy generating station project (of any technology). It is merely an indication of the capacity available. It is for each project to then be designed based upon a clear set of design objectives, criteria and constraints to deliver a project that demonstrates that impacts have been genuinely minimised. It is these impacts that define the acceptability of a scheme, not the capacity of a grid connection offer.</p> <p>It is therefore wholly apparent that the applicant has failed to make any genuine attempts to make land within the Order Limits available for the production of food. As proposed, the dDCO does not require the applicant to make any such efforts. The application must therefore be determined on the basis that no land is being made available for food production and no attempts to do so have been made by the applicant.</p> <p>The application therefore fails to comply with NPPF in this regard.</p>	
GC-03	2.1.1	7000 Acres <b>[REP5-051]</b>	<p><b>Revised National Planning Policy Framework</b> The Revised National Planning Policy Framework (NPPF) was published in December 2023. All parties are invited to comment on the implications of any changes made the consideration of the proposed development.</p>	<p>The revised NPPF includes footnote 62 that states:</p> <p><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 other policies in this Framework, when deciding what sites are most appropriate for development."</i></p> <p>The Letter from the Chief Planner 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> <p><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></p> <p><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></p> <p>The requirement to consider food production as part of this Examination is unequivocal .</p>	Please refer to the Applicant's responses to GC-01 and GC-03 above.

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				The update to the NPPF is also consistent with the Written Ministerial Statement of March 25th 2015, which remains extant.	
GC-04	2.1.2	Lincolnshire County Council (LCC) <b>[REP5-042]</b>	<p><b>Cumulative Assessments</b></p> <p>Concerns have been raised about the adequacy of the cumulative assessments before the Examination (for example, by West Lindsey District Council (WLDC) in its Written Representation [REP1A-004]). Specifically, WLDC set out that in order for the decision maker to have adequate information before them to make a sound decision, a cumulative assessment that addresses various combinations of solar NSIP are required. The information before us in the Joint Report sets out the cumulative impacts of 4 NSIPs, with additional information relating to 3 others set out in the Technical Note on Cumulative Effects.</p> <p>The EIA Regulations Schedule 3 paragraph 1(b) refers to the consideration of the cumulation with other projects. Also the provisions set out in NPS EN-1 paragraph 4.2.5 are that 'when considering cumulative effects, the ES should provide information on how the effects of the applicant's proposal would combine and interact with the effects of other development (including projects for which consent has been sought or granted, as well as those already in existence). With these provisions in mind:</p> <p>a. The Applicant is asked to comment on the extent to which this additional information can and should be provided to the Examination; and,</p> <p>b. Other parties are asked to set out what further information should be required.</p>	<p>At present, the only cumulative scenario that can be considered for the purpose of decision making is one where all projects are consented. There is no assessment of how each combination of projects perform (e.g. 2 projects together). The Council are concerned that, if all DCO applications are considered individually without proper regard to the cumulative impacts and/or only in a scenario where all cumulative projects are consented, they may all be considered acceptable as isolated schemes, but with no consideration of whether there is a 'tipping point' from acceptability into unacceptability. This approach to decision making is flawed as it would allow projects to progress that could have unacceptable cumulative impacts with each other.</p> <p>The Council contends that, in order for the decision maker to have adequate information before them to make a sound decision, a cumulative assessment that addresses the following combinations should be provided as a minimum:</p> <ul style="list-style-type: none"> <li>• Cottam + Gate Burton</li> <li>• Cottam + West Burton</li> <li>• Cottam + Tillbridge</li> <li>• Cottam + Gate Burton + West Burton</li> <li>• Cottam + Gate Burton + Tillbridge</li> <li>• Cottam + West Burton + Tillbridge; and</li> <li>• Cottam + Gate Burton + West Burton + Tillbridge</li> </ul> <p>Unless such assessments are carried out, there is no ability for the decision maker to determine whether a combination of two projects could be acceptable cumulatively; they could only consider the total cumulative impacts of all projects that form the assessment. Should the cumulative impacts of all projects be concluded to be unacceptable, the Council is unclear about how the decision maker determines which project(s) influence that unacceptable conclusion the greatest. The Council are therefore concerned about whether the decision maker is able to conclude a single DCO application is unacceptable based upon its cumulative impacts and, if the cumulative situation was concluded to be unacceptable, the current assessment does not allow for a decision where two of the project are considered to be acceptable.</p> <p>The reasoning behind the Council's concern is triggered by the overlapping nature of cumulative projects, where by each ExA is assessing the single project in front of them only, but that none of the applications are consented, and may be determined at the same time by the Secretary of State. The Council is</p>	<p>Please refer to the Applicant's response to question 2.1.2 in <b>WB8.1.34 The Applicant's Response to ExA's Second Written Questions [REP5-039]</b>.</p> <p>The Applicant reiterates its position that the assessment of cumulative effects in the <b>Environmental Statement [APP-039 to APP-061, REP1-012, REP3-010, REP5-015 and REP5-030]</b>, provides a sufficient level of detail to satisfy EIA Regulations 2017 Schedule 3 paragraph 1(b) and paragraph 4.2.3 of the recently adopted NPS EN-1 (Nov 2023). The Applicant is also confident that the approach is consistent with the provisions set out in NPS EN-1 (2011) as referred to by the ExA. The Applicant's approach has been to assess the worst-case scenario of all NSIPs within the assessment area coming forward, and as such, to provide additional assessment of each combination of schemes would serve no additional purpose to the Secretary of State for determining the likely significant cumulative effects of any combination of cumulative NSIP schemes. As such, the Applicant does not intend to provide this additional assessment as requested by WLDC.</p>



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				<p>concerned unless an assessment of various combinations of projects are carried out and not just a reliance upon a 'worst case' assessment of all projects taken together. The Council considers that, in the event that this project at examination projects Gate Burton and Cottam at recommendation stage are determined at the same time by the Secretary of State, the environmental information provided only allows for three decision options to be made:</p> <p>To grant consent for a single project only; or ii. To grant consent for all three projects; or iii. To refuse consent for all three projects. During Issue Specific Hearing 4 'Cumulative Effects' (06/12/2023) for the Cottam examination this position was fairly described as an 'all or nothing' scenario by the ExA, a definition to that the Council agrees with.</p>	
GC-05	2.1.2	7000 Acres [REP5-051]	<p><b>Cumulative Assessments</b></p> <p>Concerns have been raised about the adequacy of the cumulative assessments before the Examination (for example, by West Lindsey District Council (WLDC) in its Written Representation [REP1A-004]). Specifically, WLDC set out that in order for the decision maker to have adequate information before them to make a sound decision, a cumulative assessment that addresses various combinations of solar NSIP are required. The information before us in the Joint Report sets out the cumulative impacts of 4 NSIPs, with additional information relating to 3 others set out in the Technical Note on Cumulative Effects.</p> <p>The EIA Regulations Schedule 3 paragraph 1(b) refers to the consideration of the cumulation with other projects. Also the provisions set out in NPS EN-1 paragraph 4.2.5 are that 'when considering cumulative effects, the ES should provide information on how the effects of the applicant's proposal would combine and interact with the effects of other development (including projects for which consent has been sought or granted, as well as those already in existence). With these provisions in mind:</p> <p>a. The Applicant is asked to comment on the extent to which this additional information</p>	<p>7000Acres agrees with the WLDC Written Representation. For there to be a meaningful assessment of the cumulative effects, 7000Acres call for an independent assessment of the proposed developments to study the cumulative impacts of all the solar developments within the area (including Steeple Renewables), rather than a desktop review of the submission material by the Applicants themselves.</p> <p>The independent assessment should include evaluating the impacts from one or more schemes, and a combination of the schemes.</p>	Please refer to the Applicant's response to question 2.1.2 in <b>WB8.1.34 The Applicant's Response to ExA's Second Written Questions [REP5-039]</b> .

Ref	ExA FWQ's	Respondent	Question	Response	Applicant's Comment
			can and should be provided to the Examination; and,  b. Other parties are asked to set out what further information should be required.		
GC-06	2.1.3	Lincolnshire County Council (LCC)  [REP5-042]	<b>Statements of Common Ground (SoCG)</b>  The ExA notes that the SoCGs with the Host Authorities indicate a number of matters are still under discussion. These include a number of factual matters eg site description. The ExA considers that it should be possible for many of these matters to be agreed at this point in the Examination. Please provide updated SoCGs at Deadline 5 which clearly identifies the outstanding matters in dispute between the Applicant and each Host Authority and provides details of each party's position in respect of them.	The Council continues to work with the applicant in respect of the SOCG and this will be concluded by Deadline 6. The ExA should take into consideration that as well as this examination the Council has been working to conclude SOCG for Cottam and Heckington Fen Examinations which concluded during the last couple of months. Having to conclude 3 SOCGs in a couple of months is very resource intensive for the Council and so the requirements for this examination should not be viewed in isolation with all the other NSIP activating currently taking place in Lincolnshire.	The Applicant notes this comment. We continue to work proactively and collaboratively with the Council. The Draft Statement of Common Ground submitted at Deadline 6 [EX6/WB8.3.1_A] is not finalised and signed but is in the form that the Applicant expects the signed version to take. This will be submitted at Deadline 7.
GC-07	2.1.3	West Lindsey District Council (LCC)  [REP5-047]	<b>Statements of Common Ground (SoCG)</b>  The ExA notes that the SoCGs with the Host Authorities indicate a number of matters are still under discussion. These include a number of factual matters eg site description. The ExA considers that it should be possible for many of these matters to be agreed at this point in the Examination. Please provide updated SoCGs at Deadline 5 which clearly identifies the outstanding matters in dispute between the Applicant and each Host Authority and provides details of each party's position in respect of them.	WLDC has included as Appendix A to this response, as summary of agreed matters with the applicant.  [Refer to <a href="#">EN010132-001775-West Lindsey District Council - Responses to the ExAs Second Written Questions.pdf (planninginspectorate.gov.uk)</a> ]  All other matters are still being discussed. With the applicant committing to the submission of further information and clarifications across a range of topics, WLDC reserves it's position until such information has been submitted and reviewed.	The Draft Statement of Common Ground submitted at Deadline 6 [EX6/WB8.3.2_B] is not finalised and signed but is in the form that the Applicant expects the signed version to take. This will be submitted at Deadline 7.
GC-08	2.1.4	7000 Acres  [REP5-051]	<b>Implications of the increase in the life of the Proposed Development from 40 to 60 years</b>  WLDC sets out that, with reference to the implications of the increase from 40 to 60 year life, 'the impacts of this change have not been re-assessed so that all parties can understand how this significant increase in the lifetime (to become effectively a	7000Acres agree with WLDC that the implications of the increase from 40 to 60-year life, 'have not been re-assessed so that all parties can understand how this significant increase in the lifetime (to become effectively a permanent development) has been considered".  The Applicant has persistently described their proposed development as being "temporary". Even with the original duration of the operational phase being 40 years, the periods of construction and decommissioning would be likely to extend the overall duration of the scheme to 50 years. In no way can this duration be considered to be temporary; and in human terms this could be	Please refer to the Applicant's response to question 2.1.4 in <b>WB8.1.34 The Applicant's Response to ExA's Second Written Questions [REP5-039]</b> for all parts of this question.  The Applicant wishes to reiterate that:  Its position that it is cognisant that the lifetime of the Scheme is long-term, whether that be for 40 years or up to a maximum of 60 years, the DCO contains provisions for the requirements of the Scheme to be fully decommissioned and the land be restored to agricultural

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			<p>permanent development) has been considered.' [REP4-083].</p> <p>More specifically, WLDC suggest that the replacement of BESS/panels associated with the increase in lifespan is likely to give rise to significant environmental effects (especially as the frequency and extent of the replacement is unknown), particularly in relation to traffic, noise, air quality and waste, noting also there could be cumulative effects associated with the other solar projects currently in the system. Furthermore, in the event that significant additional environmental effects were to occur, there is no formal mechanism in place to address this.</p> <p>The Applicant is invited to comment on these concerns, particularly in terms of:</p> <p>a. how additional impacts have been accounted for,</p> <p>b. the accessibility of this information,</p> <p>c. the suggestion that the development would, in effect, be permanent.</p> <p>d. The suggestion that, should the 24% replacement figure be exceeded, there is no mechanism for requiring the Applicant to demonstrate that no significant environmental impacts would occur.</p>	<p>considered to be two generations. People will potentially live their entire lives in such a landscape and not know anything else.</p> <p>To propose an extension of the scheme from 40 to 60 years exacerbates the situation of such a development being a de facto permanent installation for the population living alongside the development.</p> <p>It is clear with the NSIP process that applications should be "front loaded", and so such a material change to the duration of the scheme as extending its life by 50%, should have been the basis of consultation with the public and for the body of studies conducted by the Applicant in support of their application.</p> <p>Failure to have adequately considered something as fundamental as the operational life of the scheme is a serious oversight by the Applicant, and is material to the basis of the Application, undermining the already unreasonable claim that the scheme is "temporary" in nature and rendering inadequate the studies the Applicant has conducted.</p> <p>We have the following specific comments:</p> <p>a. how additional impacts have been accounted for The Applicant appears to claim that increasing the life of the scheme by 50% will have no additional impact. However, their main ES documentation is based on a life of 40 years with no substantial evidence provided to support their claim that increasing the scheme's life to 60 years will have no additional impact.</p> <p>b. the accessibility of this information The Applicant's documentation is not consistent. Depending on which part of the documentation is read a different answer will be stated. For example, most of the documentation still states a life of 40 years. Advice Notice Nine paragraph 1.4 requires there is consistency across all documents, this is lacking.</p> <p>c. the suggestion that the development would, in effect, be permanent. In other projects, such as Lullington, the Inspector described 40 years as "generational". Revised EN-3 2.10.149 states an "upper limit of 40 years is typical". The Applicant has not stated why 40 years is not sufficient, although their public consultation was based on 40 years. Evidence from research conducted for the Welsh Government shows that agricultural land, in particular BMV may not revert to its original state, so making the damage to soil quality permanent: please see our response to question 2.3.6.</p> <p>d. The suggestion that, should the 24% replacement figure be exceeded, there is no mechanism for requiring the Applicant to demonstrate that no significant environmental impacts would occur. A full response is shown in 2.9.3. In summary, the Applicant is underestimating the replacement cycles of the solar panels and takes no account of replacement on economic grounds. This will impact on transport, waste, noise and GHG emissions. By understating the PV panel replacement requirements the</p>	<p>use. As this requirement is secured by Requirement 21 in Schedule 2 of the <b>draft DCO [EN010132/EX6/WB3.1_G]</b> it is not reasonable to suggest that the Scheme be considered even "effectively" permanent, as the duty for the Scheme operator to decommission the Scheme will not be removed.</p> <p>The full wording of Paragraph 2.10.149 of EN-3, November 2023 states "<i>An upper limit of 40 years is typical, although applicants may seek consent without a time period or for differing time-periods for operation.</i>"</p> <p>Therefore, the Applicant is applying for a time limit of 60 years which is provided for in policy. The Applicant has furthermore sought to ensure that the DCO Application and examination documentation is consistent in reference to a 60-year time limit with the submission of updated documents to be certified submitted at Deadline 6:</p> <ul style="list-style-type: none"> <li>• ES Non-Technical Summary [EX6/WB6.5_B];</li> <li>• Outline Construction Environmental Management Plan [EX6/WB7.1_D];</li> <li>• Outline Decommissioning Statement [EX6/WB7.2_B];</li> <li>• Outline Landscape and Ecological Mitigation Plan [EX6/WB7.3_E];</li> <li>• Outline Battery Storage Safety Management Plan [EX6/WB7.9_B]; and</li> <li>• Outline Skills, Supply Chain and Employment Plan [EX6/WB7.10_B].</li> </ul>

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				Applicant has not taken full account of the impact of their scheme, and the cumulative impact on the region, so not applied a reasonable worst case to the EIA.	
<b>2.2 Agriculture and Soils</b>					
SOI-01	2.2.1	Lincolnshire County Council (LCC) <b>[REP5-042]</b>	<p><b>Future Agricultural Use – Grazing</b></p> <p>The Applicant states that the land is 'available' for agricultural purposes, however there is no firm commitment to making the land available for such purposes. ES Chapter 19 Soils and Agriculture [APP-057] (para. 19.9.18) states that during operation "grass below and between the solar panels will need to be managed. This management <b>can</b> include grazing by livestock <b>where appropriate</b>" Furthermore, para. 19.10.8 states that, during operation, "opportunities for farm enterprises to utilise the land within the sites will be <b>limited to periods</b> of grazing small livestock".</p> <p>There is no guarantee that the land will be used for grazing, that there is no decision made on whether it is appropriate to do so. If it is utilised, that use may 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 reduced.</p> <p>Please can the Applicant explain how, at WBSP and cumulatively across other projects, it has concluded the significant benefit effect? With regard to cumulative impact on agriculture, of multiple solar projects within the county, will there come a point at which the impact is not assessed as beneficial?</p>	<p>Unless a suitable farmer/grazier is identified and terms of agreement, such as a tenancy or grazing agreement are negotiated and captured in a formal agreement presented to the examination no weight can be given to the potential use of the site for grazing once the panels are installed.</p> <p>Without the confidence of a suitable agreement it is more likely that the land will be mown or cut to control grass growth and weeds.</p>	<p>Please refer to the Applicant's response to question 2.2.1 in <b>WB8.1.34 The Applicant's Response to ExA's Second Written Questions [REP5-039]</b>.</p> <p>Attempting to place a commitment to grazing on the land, in terms of numbers of livestock or duration of grazing, would interfere with the objective management of the grazing for no identifiable benefit.</p>
SOI-02	2.2.1	7000 Acres <b>[REP5-051]</b>	<p><b>Future Agricultural Use – Grazing</b></p> <p>The Applicant states that the land is 'available' for agricultural purposes, however there is no firm commitment to making the</p>	<p>There is no recent history of large-scale sheep farming in Lincolnshire.</p> <p>Due to the collapse in the price of wool and low wholesale lamb meat prices, it is highly improbable that anything more than a token flock of sheep will ever be grazed on this scheme and the other solar schemes totalling 13,000 acres in the</p>	<p>Please refer to the Applicant's response to question 2.2.1 in <b>WB8.1.34 The Applicant's Response to ExA's Second Written Questions [REP5-039]</b>.</p>

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			<p>land available for such purposes. ES Chapter 19 Soils and Agriculture [APP-057] (para. 19.9.18) states that during operation "grass below and between the solar panels will need to be managed. This management <b>can include grazing by livestock where appropriate</b>"</p> <p>Furthermore, para. 19.10.8 states that, during operation, "opportunities for farm enterprises to utilise the land within the sites will be <b>limited to periods</b> of grazing small livestock".</p> <p>There is no guarantee that the land will be used for grazing, that there is no decision made on whether it is appropriate to do so. If it is utilised, that use may 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 reduced.</p> <p>Please can the Applicant explain how, at WBSP and cumulatively across other projects, it has concluded the significant benefit effect? With regard to cumulative impact on agriculture, of multiple solar projects within the county, will there come a point at which the impact is not assessed as beneficial?</p>	<p>local area. Productive grass, such as would be grown on this fertile land, can support circa 6-10 sheep per acre. So, to achieve a "significant beneficial effect" circa 11,400 sheep (769 ha, 1900 acres at 6 sheep per acre) would be required for this scheme, and cumulatively 78,000 sheep for all the NSIPs in the local area.</p> <p>In reality this, and the other solar NSIPs, will displace food production abroad and not be replaced by productive sheep farming. The House of Commons Environmental Audit Committee Report, 29 November 2023, paragraph 201 states:</p> <p><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> <p>Paragraph 31 of the Report states:</p> <p><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>Therefore, both as a single development and cumulatively with the other local solar NSIPs, the Applicant's description of some limited grazing opportunities cannot be credibly described as providing a "significant beneficial effect". Due to displacing food production overseas the global impact will be adverse.</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> <p>The Applicant notes that the Government's response dated 22 April 2024 to a petition relating to solar and food security stated:</p> <p><i>"Solar and farming can be complementary, supporting each other financially, environmentally and through shared use of land. Government considers that meeting energy security and climate change goals is urgent and of critical importance to the country, and that these goals can be achieved together with maintaining food security for the UK...Solar projects and agricultural practice can co-exist. Many solar projects are designed to enable continued livestock grazing. A science of agrivoltaics is developing in which solar is integrated with arable farming in innovative ways. Solar energy can also be an important way for farmers to increase their revenue from land less suited to higher value crop production."</i><sup>1</sup></p>
SOI-03	2.2.1	Simon Skelton <b>[REP5-088]</b>	<p><b>Future Agricultural Use – Grazing</b></p> <p>The Applicant states that the land is 'available' for agricultural purposes, however there is no firm commitment to making the land available for such purposes. ES Chapter 19 Soils and Agriculture [APP-057] (para. 19.9.18) states that during operation "grass below and between the solar panels will need to be managed. This management <b>can include grazing by livestock where appropriate</b>"</p> <p>Furthermore, para. 19.10.8 states that,</p>	<p>The token gesture of any sheep grazing, as seen on many other solar farm applications is just planning propaganda and a photo shoot opportunity. It has been documented that sheep grazing on solar farms can bring many negative concerns to the operator and farmer, and many operators have indeed halted this practice after planning approval has been granted. Cable and panel damage, rounding up difficulties and other husbandry issues being the main reasons for the cessation of this limited secondary function.</p> <p>The heavy and often wet land in this area is not conducive to sheep welfare. Hence this being an arable landscape, famed for growing cereals. Lincolnshire is after all "the Breadbasket of the UK." Another small issue is the obvious lack of sheep in this area. The site is likely to be sown with biodiversity mixes, not of</p>	<p>Please refer to the Applicant's response to question 2.2.1 in <b>WB8.1.34 The Applicant's Response to ExA's Second Written Questions [REP5-039]</b>, SSk-26 in <b>WB8.1.31 The Applicant's Response to Deadline 4 and Deadline 4a Submission [REP5-038]</b> and the Applicant's response to question 1.13.2 in <b>WB8.1.21 Applicant Response to ExA First Written Questions [REP3-038]</b>.</p> <p>Services of sheep grazers are increasingly in demand by arable farmers for grazing off cover crops. Graziers are</p>

<sup>1</sup> [https://petition.parliament.uk/petitions/651262?reveal\\_response=yes](https://petition.parliament.uk/petitions/651262?reveal_response=yes) - accessed

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			<p>during operation, "opportunities for farm enterprises to utilise the land within the sites will be <b>limited to periods</b> of grazing small livestock".</p> <p>There is no guarantee that the land will be used for grazing, that there is no decision made on whether it is appropriate to do so. If it is utilised, that use may 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 reduced.</p> <p>Please can the Applicant explain how, at WBSP and cumulatively across other projects, it has concluded the significant benefit effect? With regard to cumulative impact on agriculture, of multiple solar projects within the county, will there come a point at which the impact is not assessed as beneficial?</p>	<p>forage quality that would offer only poor grazing. This Agri-proposal is purely an empty option of no weight. The UK does not require hundreds of thousands of acres of additional low-grade sheep grazing on solar farms and I know that within this small 6-mile radius there is no requirement for 13,000 acres of extra sheep grazing. If a single sheep ever sets foot on one of these huge proposals, then it would be purely as a tool to keep the weeds down, nothing more. Agriculture would cease to exist on these multi thousand-acre proposals, all of which will consume our finite "croppable" farmland. What a waste.</p> <p>Finally, I ask. Why the Applicant with seemingly such high climate morals would be promoting the expansion of livestock production that could exacerbate climate change? "One sheep can produce about 30 litres of methane each day. According to the United Nations Economic Commission for Europe, methane has 28 to 34 times the impact of carbon dioxide in a 100-year period and over the first 20 years after it reaches the atmosphere, it's 84 to 86 times more potent."</p>	<p>likely to work in this area with increasing frequency to meet this demand from changing arable practice.</p> <p>Sheep would be grazed to manage the land and fatten lambs rather than be left at the site year round. Sheep would not therefore be left at the site in wet conditions over winter when there is little grass growth needing to be controlled. Regardless, claims of welfare issues for sheep on the site are exaggerated given that sheep graze upland moor sites.</p> <p>Numbers of sheep reared in the UK are sensitive to a number of factors, primarily economic (market value and agricultural support). The availability of some additional grazing for sheep on solar farms is unlikely to have any discernible effect on national sheep numbers.</p>
SOI-04	2.2.2	Lincolnshire County Council (LCC) <b>[REP5-042]</b>	<p><b>Agriculture - Long-term Impact</b></p> <p>Environmental Statement (ES) Chapter 18 – Socio-economics, Tourism and Recreation [APP-056] concludes in paragraph 18.1.4 that socio-economic impacts during operation on the agricultural industry will be limited to impacts on the agricultural industry through taking the land out of production for the lifetime of the Scheme. Para 18.7.15 quantifies the impact, concluding that:</p> <p><i>"The Scheme is projected to impact on up to 769 hectares of agricultural land for the operational lifetime of the Scheme, this will therefore cause approximately 13 FTE agricultural sector jobs to be lost ...This impacts approximately 0.3% of the agricultural sector employment, and as such is a low magnitude impact. Due to its low sensitivity this results in a long-term minor adverse effect to the Local Impact Area. In the Regional Impact Area, this is a 0.03% reduction in agricultural employment,</i></p>	<p>Grazing with sheep is likely to be low intensity agriculture, if indeed it is practised at all giving that this is not an area that hosts significant sheep grazing and certainly no comparison to the mainly arable operations that are currently undertaken.</p> <p>A 60 year loss of arable farming over 769 hectares is substantial at a local and indeed county level, when the total amount of crop foregone is considered.</p>	<p>Please refer to the Applicant's response to question 2.2.2 in <b>WB8.1.34 The Applicant's Response to ExA's Second Written Questions [REP5-039]</b>.</p> <p>The Applicant also refers to <b>8.2.3 Review of Likely Significant Effects at 60 Years [REP1-060]</b> which confirms that there are no anticipated changes to the outcome of Chapter 18 [APP-056] with the change from 40 to up to 60 years.</p>

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			<p><i>representing a negligible change to a receptor of low sensitivity. Therefore, the effect is long-term negligible adverse”.</i></p> <p>This is based on the assumption that sheep farming would continue agricultural use of the site underneath the panels. However, LCC has stated that the type of agriculture change to grazing is not like-for-like replacement.</p> <p>Please can the Applicant confirm the proportions of land locally and regionally which may be removed from agricultural use, and provide comments on how the potential 60 year removal equates to a 'long-term negligible adverse' effect. Other IPs may optionally comment.</p>		
SOI-05	2.2.2	7000 Acres <b>[REP5-051]</b>	<p><b>Agriculture - Long-term Impact</b></p> <p>Environmental Statement (ES) Chapter 18 – Socio-economics, Tourism and Recreation [APP-056] concludes in paragraph 18.1.4 that socio-economic impacts during operation on the agricultural industry will be limited to impacts on the agricultural industry through taking the land out of production for the lifetime of the Scheme. Para 18.7.15 quantifies the impact, concluding that:</p> <p><i>“The Scheme is projected to impact on up to 769 hectares of agricultural land for the operational lifetime of the Scheme, this will therefore cause approximately 13 FTE agricultural sector jobs to be lost ...This impacts approximately 0.3% of the agricultural sector employment, and as such is a low magnitude impact. Due to its low sensitivity this results in a long-term minor adverse effect to the Local Impact Area. In the Regional Impact Area, this is a 0.03% reduction in agricultural employment, representing a negligible change to a receptor of low sensitivity. Therefore, the effect is long-term negligible adverse”.</i></p>	<p>The ES understates the likely impact of employment loss arising from the loss of agricultural land and lacks transparency in its assessment of any jobs lost, or the nature of any jobs created.</p> <p>Limited interpretation of likely roles would suggest that any job creation locally will be in lower skilled, lower paid roles, and be unlikely to sustain livelihoods in the same way that jobs lost from agriculture.</p> <p>There is little or no community benefit through employment from the development, in an area that is in desperate need of jobs and prospects. The loss of farming livelihoods therefore can only be seen as an erosion of opportunity.</p> <p>The Applicant refers to the loss of 13 agricultural jobs is being detailed in ES Chapter 19: Soils and Agriculture (in 18.7.15 of ES Chapter 18). The author was not able to find any analysis of jobs / employment loss in Chapter 19, therefore the basis upon which the number of agricultural jobs lost has been calculated cannot be scrutinised.</p>	<p>Please refer to the Applicant's response to question 2.2.2 in <b>WB8.1.34 The Applicant's Response to ExA's Second Written Questions [REP5-039]</b>.</p>

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			<p>This is based on the assumption that sheep farming would continue agricultural use of the site underneath the panels. However, LCC has stated that the type of agriculture change to grazing is not like-for-like replacement.</p> <p>Please can the Applicant confirm the proportions of land locally and regionally which may be removed from agricultural use, and provide comments on how the potential 60 year removal equates to a 'long-term negligible adverse' effect. Other IPs may optionally comment.</p>		
SOI-06	2.2.3	Lincolnshire County Council (LCC) <b>[REP5-042]</b>	<p><b>Farming Methods</b></p> <p>IPs familiar with local agricultural methods have stated that much of the crop growing land around the Order area is almost never ploughed, just harrowed. Please can IPs and the Applicant provide further information on this, and if or how it may affect the assumptions, reasoning and conclusions of relevant parts of the ES.</p>	A lot of the land is already direct drilled so there may not be significant savings in energy due to reduced cultivations from solar. Also minimal tillage systems can have similar benefits as grassland in terms of building soil organic matter.	<p>Please refer to the Applicant's response to question 2.2.3 in <b>WB8.1.34 The Applicant's Response to ExA's Second Written Questions [REP5-039]</b>.</p> <p>Minimum Tillage and Direct Drilling of crops can help arrest the decline in soil organic matter on arable land, but do not have similar benefits to a fallow. Defra R&amp;D project SP08016<sup>2</sup> is clear, Table 1 of the summary report shows that Method 1a (cultivated land to grassland) is very effective for the benefit to soil organic matter. By contrast, Method 7 – reduced/zero tillage is only graded as having 'some effect'.</p> <p>As cultivation also has a weed control function, minimum tillage and direct drilling place greater reliance on the use of herbicides.</p>
SOI-07	2.2.3	West Lindsey District Council (LCC) <b>[REP5-047]</b>	<p><b>Farming Methods</b></p> <p>IPs familiar with local agricultural methods have stated that much of the crop growing land around the Order area is almost never ploughed, just harrowed. Please can IPs and the Applicant provide further information on this, and if or how it may affect the</p>	WLDC has no further information on the specific types of agricultural activity taking space on land around the Order area.	The Applicant notes this comment.

<sup>2</sup> Defra 2009. Best Practice for Managing Soil Organic Matter (SOM) in Agriculture - SP08016 <https://randd.defra.gov.uk/ProjectDetails?ProjectId=15536>



Ref	ExA FWQ's	Respondent	Question	Response	Applicant's Comment
			assumptions, reasoning and conclusions of relevant parts of the ES.		
SOI-08	2.2.3	7000 Acres [REP5-051]	<p><b>Farming Methods</b></p> <p>IPs familiar with local agricultural methods have stated that much of the crop growing land around the Order area is almost never ploughed, just harrowed. Please can IPs and the Applicant provide further information on this, and if or how it may affect the assumptions, reasoning and conclusions of relevant parts of the ES.</p>	<p>This response has been provided by an agronomist and farmer with over 50 years of practical farming experience in this region.</p> <p>The choices growers make can be influenced by:</p> <ol style="list-style-type: none"> <li>1.soil type</li> <li>2. The type of crop you intend to plant.</li> <li>3. The condition of the soil at the time.</li> <li>4. The time of year when deciding.</li> <li>5. The level of soil compaction created by the previous crop.</li> <li>6. How have preceding weather conditions affected soils and what do I need to do to rectify any issues.</li> </ol> <p>Let's consider 3b soils.</p> <p>Soil drainage and structure are key to growing successful crops. Clean open ditches and drainage schemes are essential. Compacted 3b soils must have the compaction removed before sowing a new crop otherwise they will become waterlogged in winter and suffer more in a drought. One needs to maintain a crumbly friable soil structure to enable good root growth and assimilation / uptake of nutrients from the soil.</p> <p>One must also understand cultivation techniques can change due to outside influences due to environmental policies set by government, the price of fuels, fertilizers and pesticides. Most farmers at present are trying to address the issue of carbon emissions by applying what you refer to as harrowing because it consumes less diesel fuel than ploughing.</p> <p>The wise grower will also deep cultivate / subsoil to ensure the land drains efficiently during that cropping year. This can be more beneficial than ploughing.</p> <p>What I believe to be an excellent system is to have a rotational approach by ploughing every fourth year and minimum tilling in between and subsoiling for improved rooting and drainage. Some crop roots penetrate the subsoil to a depth of 1 metre.</p> <p>Just because one hasn't seen a plough in the field doesn't mean the field hasn't been subsoiled because modern machinery combines subsoiling and harrowing in one pass in an effort to keep costs and CO2 emissions down.</p> <p>This autumn / winter has been wetter than average but is nothing new to the seasoned grower.</p> <p>One very important point to mention is arable farmers have been suffering for the last 30 years with a very pernicious weed called black grass. The weed</p>	<p>An extended fallow period with grazing and or mowing will be effective at controlling black grass as the weed will be controlled before it sets seed. Arable weeds thrive in arable crops as the arable management of the land favours them. Black grass is not a problematic weed of grazed or mown grassland. The 7000 Acres claim that a fallow period would worsen the blackgrass problem is entirely without merit.</p> <p>As noted above in response to SOI-06 Defra R&amp;D project SP08016 shows clearly that a fallow period is substantially more effective for the enhancement of soil organic matter than reduced or zero tillage arable land management.</p> <p>This area has experienced very high rainfall since last autumn that has created severe difficulties for arable land managers. It is true that such conditions are not a new development, but their current high frequency is. The Defra Food Security Report 2021 (page 82) notes that 2020 wheat yield in the UK dropped by 40% due to poor weather. This year is likely to see a similar drop in yield , particularly for clayey and poorly drained land like that found at the Site. The increasing frequency of such events is a key risk to UK food security from climate change. Increasing frequency of such events is also a clear risk to the financial viability of many arable enterprises.</p>

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				<p>genetically developed resistance to a range of herbicides. Rotational ploughing every 4 years helps to control blackgrass because every year the blackgrass lies buried, one third of the seed population dies thus reducing the population of viable seeds when the soil is ploughed in rotation. This rotational programme ensures an appropriate tillage of the soil. If the soil was left fallow it would grow black grass and seeds would get blown onto nearby fields still being farmed.</p> <p>The ES Chapter 19 makes general comments about farming methods without the benefit of local knowledge. For example, 19.8.12 states that ploughing takes place annually, which is not current practice. As identified above, less intrusive methods are actually used to cultivate the soil and so the benefits identified by the Applicant are over stated. If the land was left fallow it would grow black grass and other invasive weeds that would not be beneficial to the local environment.</p>	
SOI-09	2.2.4	Lincolnshire County Council (LCC) <b>[REP5-042]</b>	<p><b>Isopropyl Alcohol - Impact on Soil</b></p> <p>At ISH3, and in its submission at DL4 (Written Summary of the Applicant's Oral Submissions at Issue Specific Hearing 3 and Responses to Action Points) [REP4-070] the Applicant confirmed that only water is used for cleaning and that <i>"The panels require minimal cleaning as they have a self-cleaning coating"</i>.</p> <p>Can the Applicant confirm that this is de-ionised water? Further, that if or where soiling remains on the panels after rinsing, what is the procedure? IPs suggest that cleaning with de-ionised water is repeated. Where any soiling continues to prove stubborn, IPA (Isopropyl Alcohol) with a concentration of less than 10% may be used.</p> <p>If this is the case then can the applicant confirm that the use of IPA will have no effect on the soil health?</p>	<p>Any significant chemical applications to the panels could lead to localised soil problems or dead patches of grass due to any strong concentrations of alcohol or repeated doses. However this seems unlikely unless concentrations are expected to be either frequent or strong.</p>	<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 [REP5-039]</b>.</p> <p>The Applicant would like to reiterate that they have updated <b>WB7.14_D Outline Operational Environmental Management Plan Revision D [REP5-021]</b> at Deadline 5 to commit to only de-ionised water being used for cleaning. The Plan is secured by Requirement 14 in Schedule 2 of the draft DCO [EN010132/EX6/WB3.1_G].</p>
SOI-10	2.2.4	7000 Acres <b>[REP5-051]</b>	<p><b>Isopropyl Alcohol - Impact on Soil</b></p> <p>At ISH3, and in its submission at DL4 (Written Summary of the Applicant's Oral Submissions at Issue Specific Hearing 3 and Responses to Action Points) [REP4-070] the Applicant confirmed that only water is used for</p>	<p>The use of any chemicals to assist with cleaning of the panels will definitely have an effect on soil health. This oversight by the applicant is another example of where they have not considered the reasonable worst case in their applications. This chemical effect must be analysed by the Applicant, taking into account the extremely large number of panels and the effects of 60 years of cleaning. The analysis should be reported to the Examination.</p>	<p>Please refer to the Applicant's response to SOI-09 above.</p>

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			<p>cleaning and that <i>"The panels require minimal cleaning as they have a self-cleaning coating"</i>.</p> <p>Can the Applicant confirm that this is de-ionised water? Further, that if or where soiling remains on the panels after rinsing, what is the procedure? IPs suggest that cleaning with de-ionised water is repeated. Where any soiling continues to prove stubborn, IPA (Isopropyl Alcohol) with a concentration of less than 10% may be used.</p> <p>If this is the case then can the applicant confirm that the use of IPA will have no effect on the soil health?</p>		
SOI-11	2.2.5	Lincolnshire County Council (LCC) <b>[REP5-042]</b>	<p><b>Cutting and Mowing Management</b></p> <p>The OLEMP [REP4-044] states, at paragraph 4.8.11 that cutting or mowing can be carried out relatively quickly, and at 4.8.9 <i>"cutting will be carried out using a cut-and-collect system so as to minimise nutrient build up in the soil which stifles species diversity... there may be an opportunity to use the cuttings within local composting sites such as anaerobic digesters or open air windrows"</i>.</p> <p>Can the Applicant please explain this apparent contradiction between these measures and the continued use for sheep grazing. How is the balance between cutting and maintenance for long-term management assessed in the ES conclusions?</p>	<p>If cuttings are removed then there will not be a strong build up of soil carbon/organic matter. Sheep grazing returns animal manure to the soil such that there is nutrient recycling and this aids soil structure and organic matter build up. Removing the grass cuttings during a mowing regime could lead to reductions in soil fertility and reduce the claimed long term benefits of grassland.</p>	<p>Suspension of cultivation will result in maintenance of living roots in the soil year round. It will also control the rate of degradation of soil organic matter. Cultivation accelerates the rate soil organic matter consumption (by extreme aeration of the soil) and kills plants growing in the soil. This is why cultivated arable land always progresses to a low equilibrium of soil organic matter and a fallow enables a return to a higher equilibrium of soil organic matter, even with cuttings removed. Plant roots are a highly significant component of plant returns to soil organic matter and are not affected by the gathering of cuttings.</p> <p>The LCC claim that removal of cuttings will negate recovery of soil organic matter is incorrect.</p> <p>Nutrient status of arable land is maintained by farmers for each crop. On the resumption of arable production farmers will simply resume application of nutrients appropriate to the economic need of each crop. They will, however, benefit from the enhanced soil health, ie improved organic matter content, aggregate stability, rainfall infiltration and moisture retention. LCC appear to confuse soil health with nutrient availability.</p>
SOI-12	2.2.6	Lincolnshire County Council (LCC)	<p><b>Best and Most Versatile land</b></p> <p>Do the amendments to the Outline Soil Management Plan: Revision A REP3-016 provide additional confidence for Natural</p>	<p>The soil management plan (SMP) is in outline form only. However, a requirement as part of any consent requires a detailed plan be drawn up then and if properly detailed and populated could meet the necessary standard. The Council would expect the SMP to be in line with industry standards and include</p>	<p>The Applicant notes this comment and can confirm that the production of a detailed soil management plan is already secured in Schedule 2 , Requirement 19 in</p>

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		[REP5-042]	England and the Host Authorities to ensure the correct Agricultural Land Classification (ALC) will be identified and the soil managed to ensure that any disturbed land will be restored to a similar ALC grade. If not please explain why not.	decommissioning/restoration works as well as details for the construction and operation phases.	<b>WB3.1_G Draft Development Consent Order Revision G [EX6/WB3.1_G].</b>
SOI-13	2.2.6	Nottinghamshire County Council (LCC) [REP5-043]	<b>Best and Most Versatile land</b> Do the amendments to the Outline Soil Management Plan: Revision A REP3-016 provide additional confidence for Natural England and the Host Authorities to ensure the correct Agricultural Land Classification (ALC) will be identified and the soil managed to ensure that any disturbed land will be restored to a similar ALC grade. If not please explain why not.	The County Council is satisfied with the proposals for soil management insofar as they affect the proposed excavation of the cable corridor within Nottinghamshire.	The Applicant notes this comment.
SOI-14	2.2.6	West Lindsey District Council (LCC) [REP5-047]	<b>Best and Most Versatile land</b> Do the amendments to the Outline Soil Management Plan: Revision A REP3-016 provide additional confidence for Natural England and the Host Authorities to ensure the correct Agricultural Land Classification (ALC) will be identified and the soil managed to ensure that any disturbed land will be restored to a similar ALC grade. If not please explain why not.	WLDC has no further comments to make on the Outline Soil Management Plan.	The Applicant notes this comment.
SOI-15	2.2.6	Natural England [REP5-062]	<b>Best and Most Versatile land</b> Do the amendments to the Outline Soil Management Plan: Revision A REP3-016 provide additional confidence for Natural England and the Host Authorities to ensure the correct Agricultural Land Classification (ALC) will be identified and the soil managed to ensure that any disturbed land will be restored to a similar ALC grade. If not please explain why not.	Yes. Natural England have worked with the applicant to embed the changes, and associated actions, into the oSMP.	The Applicant notes this comment.
SOI-16	2.2.6	7000 Acres [REP5-051]	<b>Best and Most Versatile land</b> Do the amendments to the Outline Soil Management Plan: Revision A REP3-016	It is 7000 acres' contention that the Applicant's professional judgement is open to doubt and that Natural England's soil expert should have analysed the ALC results and given this Examination their own professional judgement as to the	Please refer to the Applicant's response to 7A-106 and 7A-107 in <b>WB8.1.18 Response to Written Representations at Deadline 1 Part 2 [REP3-035].</b>

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			provide additional confidence for Natural England and the Host Authorities to ensure the correct Agricultural Land Classification (ALC) will be identified and the soil managed to ensure that any disturbed land will be restored to a similar ALC grade. If not please explain why not.	<p>veracity of the results. We note that the Applicant has not responded to the issues we raised in REP1A-011</p> <p>Research by the Welsh Government calls into doubt if BMV land can ever be returned to its original state after 60 years of use as a solar industrial site. In particular, the research identified that 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.</p>	<p>7000 Acres seriously misrepresents the Welsh Government research on solar and agricultural land. The Soil Policy Evidence Programme<sup>3</sup> does not, as 7000 Acres claim, find that installing solar on farmland results in deep compaction. The literature review considers the potential for solar farm effects such as soil compaction based upon the available research on soil compaction, most of which predates any solar farm development at all. For instance, section 2.5 cites 1985 research finding that a 10 tonne axle load can increase soil bulk density to a depth of 50cm. Such axle loads are however common for harvest operations, but not the installation of narrow steel piles. Harvest operations are also highly time sensitive and cannot benefit from the measures to avoid soils in a plastic consistency given in the Soil Management Plan, that significantly reduce the risk of soil compaction.</p> <p><b>WB6.3.19.2_A ES Appendix 19.2 Outline Soil Management Plan Revision A [REP3-016].</b> The Plan is secured by Requirement 19 in Schedule 2 of the draft DCO [EN010132/EX6/WB3.1_G]</p>
SOI-17	2.2.7	Lincolnshire County Council (LCC) <b>[REP5-042]</b>	<p><b>Written Ministerial Statement 25 March 2015</b></p> <p>Please can IPs comment on the extent to which the Written Ministerial Statement of 25 March 2015 in relation to BMV, if they have not already done so. Please comment how it is relevant and important to the consideration of the effects of the development on BMV in this case.</p>	<p>It is the Council's view that as the Ministerial Statement has not been rescinded it is still Government Policy and therefore should carry significant weight in the consideration of the application in terms of the development on and long-term loss of BMV. The Ministerial Statement states that any proposal for a solar farm involving the best and most versatile agricultural land would need to be justified by the most compelling evidence. It is the Council's view that the test to use BMV requires the applicant to provide that compelling evidence to meet the necessary threshold set for the loss of BMV.</p>	<p>Please refer to the Applicant's response to question 2.2.7 in <b>WB8.1.34 The Applicant's Response to ExA's Second Written Questions [REP5-039]</b> and the response to GC-01 above.</p> <p>The Government updated the National Policy Statements (NPSs) for energy infrastructure on 22 November 2023. These NPSs were then designated by the Secretary of State on 17 January 2024. This represents the latest Government position for new energy infrastructure and it is therefore the Applicant's position that the WMS needs to be read in the context of NPS EN-1 and EN-3 (November 2023).</p>
SOI-18	2.2.7	Nottinghamshire County Council (LCC)	<p><b>Written Ministerial Statement 25 March 2015</b></p> <p>Please can IPs comment on the extent to which the Written Ministerial Statement of 25</p>	<p>The County Council notes the Ministerial Statement of 2015 in respect of BMV agricultural land and solar farms. It considers that it is relevant in stressing the importance of protecting higher quality agricultural land and that large scale</p>	<p>Please refer to the Applicant's response to question 2.2.7 in <b>WB8.1.34 The Applicant's Response to ExA's Second Written Questions [REP5-039]</b> and the response to GC-01 above.</p>

<sup>3</sup> Welsh Government Soil Policy Evidence Programme 2020/21 <https://www.gov.wales/impact-solar-photovoltaic-sites-agricultural-soils-and-land-quality-review-impacts>

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		[REP5-043]	March 2015 in relation to BMV, if they have not already done so. Please comment how it is relevant and important to the consideration of the effects of the development on BMV in this case.	solar farms which involve the best and most versatile agricultural land must only be justified by the most compelling evidence.	The Government updated the National Policy Statements (NPSs) for energy infrastructure on 22 November 2023. These NPSs were then designated by the Secretary of State on 17 January 2024. This represents the latest Government position for new energy infrastructure and it is therefore the Applicant's position that the WMS needs to be read in the context of NPS EN-1 and EN-3 (November 2023).
SOI-19	2.2.7	West Lindsey District Council (LCC) [REP5-047]	<b>Written Ministerial Statement 25 March 2015</b> Please can IPs comment on the extent to which the Written Ministerial Statement of 25 March 2015 in relation to BMV, if they have not already done so. Please comment how it is relevant and important to the consideration of the effects of the development on BMV in this case.	The Ministerial Statement states that the National Planning Policy Framework (NPPF) provides strong protections for the natural and historic environment. Local Planning Authorities should therefore take into account the socio-economic and environmental benefits of the best and most versatile (BMV) agricultural land when determining planning applications.  With regard to solar energy development, the Minister's Statement affirms: <ul style="list-style-type: none"> <li>Local communities have genuine concerns that when it comes to solar farms insufficient weight has been given to these protections and the benefits of high quality agricultural land.</li> <li>Meeting energy goals should not be used to justify the wrong development in the wrong location and this includes the unnecessary use of high quality agricultural land.</li> <li>NPPF requires explanation that BMV land is necessary and that poorer quality land is to be used in preference to land of a higher quality.</li> <li>Any proposal for a solar farm involving the best and most versatile agricultural land would need to be justified by the most compelling evidence.</li> <li>every application needs to be considered on its individual merits.</li> </ul> The Ministerial Statement therefore clarifies that the protection of agricultural land from solar development is a material planning issue, and that the need case for solar development should not override impacts on the value of agricultural land.  WLDC contend that the Ministerial Statement is an 'important and relevant' matter in the context of section 105 and should be given significant weight in the determination of the Gate Burton Energy Park application.	Please refer to the Applicant's response to question 2.2.7 in <b>WB8.1.34 The Applicant's Response to ExA's Second Written Questions [REP5-039]</b> and the response to GC-01 above.  The Government updated the National Policy Statements (NPSs) for energy infrastructure on 22 November 2023. These NPSs were then designated by the Secretary of State on 17 January 2024. This represents the latest Government position for new energy infrastructure and it is therefore the Applicant's position that the WMS needs to be read in the context of NPS EN-1 and EN-3 (November 2023).
SOI-20	2.2.7	Natural England [REP5-062]	<b>Written Ministerial Statement 25 March 2015</b> Please can IPs comment on the extent to which the Written Ministerial Statement of 25 March 2015 in relation to BMV, if they have not already done so. Please comment how it	This statement sets out the importance of Best and Most Versatile (BMV) land, making clear direction that non agricultural, and lower quality agricultural land should be preferred to BMV land. However, the statement does not preclude solar development on BMV land altogether. The statement's key points relating to BMV land are enshrined within the NPS EN-1 (5.11.12 & 5.11.34) & EN-3 (2.10.29, 2.10.30 & 2.10.145).	Please refer to the Applicant's response to question 2.2.7 in <b>WB8.1.34 The Applicant's Response to ExA's Second Written Questions [REP5-039]</b> and the response to GC-01 above.

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			is relevant and important to the consideration of the effects of the development on BMV in this case.	NE have provided comment on BMV land, especially with regard to appropriate survey and management across the development's area and lifetime. The planning inspectorate must consider the impact of the proposal upon Best and Most Versatile Land in line with the relevant NPS, when making their recommendation.	The Applicant notes this comment and agrees that the Written Ministerial Statement does not preclude solar on BMV.
SOI-21	2.2.7	7000 Acres [REP5-051]	<p><b>Written Ministerial Statement 25 March 2015</b></p> <p>Please can IPs comment on the extent to which the Written Ministerial Statement of 25 March 2015 in relation to BMV, if they have not already done so. Please comment how it is relevant and important to the consideration of the effects of the development on BMV in this case.</p>	<p>The High Court has recently dismissed an appeal by Island Green Power and upheld the principles stated by the Planning Inspector regarding the Lullington solar scheme. <a href="https://www.bailii.org/ew/cases/EWHC/Admin/2024/295.htm">https://www.bailii.org/ew/cases/EWHC/Admin/2024/295.htm</a></p> <p>The following is extracted from the Lullington Planning Inspector's Appeal Decision. Hearing held on 18 April 2023 by Gareth W Thomas BSc(Hons) MSc(Dist) DMS MRTPI an Inspector appointed by the Secretary of State. Decision date: 21 July 2023. Appeal Ref: APP/F1040/W/22/3313316 Land North of Lullington, Swadlincote, Derbyshire, DE12 8EW</p> <p><i>"Decision</i></p> <p><i>1. The appeal is dismissed.</i></p> <p><i>Best and Most Versatile Agricultural Land</i></p> <p><i>8. The parties agreed that the Written Ministerial Statement (WMS) dated 25 March 2015 relating to the unjustified use of agricultural land remains extant. It states therein that any proposal for a solar farm involving the best and most versatile agricultural land (BMV) would require to be justified by the most compelling evidence (my emphasis).</i></p> <p><i>9. The WMS is linked to updated National Planning Policy Guidance1 (NPPG), which explains that where a proposal involves greenfield land, consideration should be given as to whether the proposed use of any agricultural land has shown to be necessary, whether poorer quality land has been used in preference to higher quality land and to whether the proposed development would allow for continued agricultural use where applicable and/or where biodiversity improvements around arrays would be provided. This is reflected in the National Planning Policy Framework (the Framework) which suggests that where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of higher quality.</i></p> <p><i>11. Paragraph 174(b) of the Framework states that planning decisions should recognise the intrinsic character and beauty of the countryside, and the wider benefits from natural and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.</i></p> <p><i>22. There is no definition of what might constitute 'compelling evidence' but I accept the Council's arguments that the evidence fails to demonstrate that there are no suitable poorer quality areas of land in the study area that could be used or accommodate the appeal development save for a broad brush map based review. In this regard, the appeal proposal contravenes relevant provisions of BNE4 of the SDLP,</i></p>	<p>Please refer to the Applicant's response to question 2.2.7 in <b>WB8.1.34 The Applicant's Response to ExA's Second Written Questions [REP5-039]</b> and comment 7A-32 in <b>WB8.1.31 The Applicant's Response to Deadline 4 and Deadline 4A Submissions [REP5-038]</b>. It is considered that the latest Government position for new energy infrastructure is set out in the recently updated National Policy Statements (NPSs) for energy infrastructure on 22 November 2023. The reference to the Town and Country Planning Act solar scheme at Lullington is not considered to be relevant given that this Scheme is a NSIP examined under the Planning Act 2008. Further, the decision being challenged in that case was made prior to the Energy NPS being adopted in January 2024.</p> <p>The Applicant agrees that the WMS is extant but that it needs to be read in the context of the NPS.</p>

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				<p><i>the NPPG and the WMS. The loss of just under 50% of BMV is a significant negative aspect of the appeal proposal which weighs heavily against the development."</i></p> <p>Based on the High Court Judgement and the Lullington Appeal Decision, it is clear that the Written Ministerial Statement of 25 March 2015 remains extant. In addition to the NPS, the NPPF footnote 62 reiterates the importance of farming land and food production in finding a balance between energy needs and feeding the UK population.</p> <p>Although the percentage of BMV land claimed by the Applicant in the case of WBSS is smaller than Lullington, the total acreage of BMV land is likely to be similar, due to the large size of WBSS, and therefore should be regarded as a significant loss of BMV land.</p>	
SOI-22	2.2.8	Lincolnshire County Council (LCC) <b>[REP5-042]</b>	<p><b>Permanent or Temporary Nature of Loss of Agricultural Land</b></p> <p>The ExA notes that LCC does not consider that the removal of agricultural land for a period of 60 years can be classed as temporary and this should be assessed as a permanent loss of agricultural land. REP3-042 states that <i>"A 60 year lifespan is all but equivalent to an entire life time and, on a human scale, is hardly "temporary" in the common use of this word. The effects of this longevity should be assessed as essentially permanent effects as that is how they are experienced in reality"</i>.</p> <p>IPs are invited to comment on the temporary nature and provide any evidence as to how they consider the relative degree of permanence V temporary loss.</p>	<p>Temporary is not defined, but by any measure 60 years is a long period of time. The loss of farmland and its alternative uses for food production over 60 years has to be considered as effectively permanent and its loss considered as if permanent.</p>	<p>Please refer to the Applicant's response to question 2.2.8 in <b>WB8.1.34 The Applicant's Response to ExA's Second Written Questions [REP5-039]</b>.</p>
SOI-23	2.2.8	West Lindsey District Council (LCC) <b>[REP5-047]</b>	<p><b>Permanent or Temporary Nature of Loss of Agricultural Land</b></p> <p>The ExA notes that LCC does not consider that the removal of agricultural land for a period of 60 years can be classed as temporary and this should be assessed as a permanent loss of agricultural land. REP3-042 states that <i>"A 60 year lifespan is all but equivalent to an entire life time and, on a human scale, is hardly "temporary" in the common use of this word. The effects of this</i></p>	<p>WLDC wholly agrees with LCC in that the lifespan of the project for a period of 60 years should be assessed as constituting a permanent loss of agricultural land. All other impacts should also be assessed similarly on the basis of being 'permanent' impacts due to this significant timescale.</p> <p>Many developments subject to a 'permanent' permission/consent exist for a similar or even shorter period. As an example, the Cottam Power Station (commissioned 1968) and West Burton Power Stations (commissioned 1966) have been in existence for similar time periods with over two generations experiencing their presence and impacts. To suggest that these impacts on the communities were in any way 'temporary' and should be calibrated as being less significant as a consequence would be flawed. This is the position, however, that</p>	<p>Please refer to the Applicant's response to question 2.1.4 and 2.2.8 in <b>WB8.1.34 The Applicant's Response to ExA's Second Written Questions [REP5-039]</b>.</p> <p>The Applicant acknowledges the reference to the planning appeal decision but wishes to reiterate that the Applicant is cognisant that the lifetime of the Scheme is long-term, whether that be for 40 years or up to a maximum of 60 years, the DCO contains provisions for the requirements of the Scheme to be fully decommissioned and the land be restored to agricultural use. As this requirement is secured by Requirement 21 in Schedule 2 of the draft</p>



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			<p><i>longevity should be assessed as essentially permanent effects as that is how they are experienced in reality".</i></p> <p>IPs are invited to comment on the temporary nature and provide any evidence as to how they consider the relative degree of permanence V temporary loss.</p>	<p>the applicant for the West Burton Solar Project is inviting the Secretary of State to accept, with many of the residual environmental impacts assessed being reduced in magnitude and/or deemed to be acceptable due predominantly to the supposed temporal nature of the project.</p> <p>To support it's position, WLDC wishes to draw the ExAs attention to a recent planning appeal decision, made by the Secretary of State, under section 78 of the Town and Country Planning Act 1990 by ANNESCO LTD for the construction and operation of a temporary Solar Farm of up to 49.72MW to include the installation of solar panels with transformers, a substation, a DNO control room, a customer substation, GRP comms cabin, security fencing, landscaping and other associated infrastructure at Land at Milton Road, Gayton, Northampton NN7 3HE. The appeal reference is APP/W2845/W/23/3314266.</p> <p>The decision was made on 13th March 2024 and therefore considered both the revised version of the NPPF (December 2023) and the revised NPS EN-1 and EN-3 (confirmed in SoS letter para.5).</p> <p>The application sought a permission for a temporary period of 40 years.</p> <p>With regard to the temporary of the proposal, the SoS agreed with the Inspector in that <i>"little weight should be afforded to the potential reversibility of the proposal in landscape or visual terms"</i>. This agreement cross-referenced the reasons given by the Inspector in their report, which states when considering landscape and visual effects:</p> <p><i>"10.55 Before concluding this matter, it is necessary to consider the issue of the temporary status of the proposal. At a number of points in the submission of evidence on matters relating to landscape effects, as well as effects on agricultural land, reference was made to this being a temporary proposal and that the site would revert to its existing condition, or even an improved condition, at the end of the period.</i></p> <p><i>10.56 However, 40 years is a considerable length of time during which people's experience of the development within the rural landscape or its role as part of the recreational resource would be altered. For some people, were the proposal to gain permission, it would establish a landscape that may be all they know and whose effects may progress through to later generations. The proposal may not be a permanent change but would reflect a very long-term change, and over such a period of time, there can be no guarantees on the future need for such energy sources or the pressures that might lead to re-powering or extending its life. Consequently, I would recommend that little weigh is given to the aspect of the potential reversibility of the proposal in landscape or visual terms."</i></p> <p>The Inspector concludes that the proposal would consequently have a "material adverse" effect on the visual and landscape character of the site.</p>	<p>DCO [EX6/WB3.1_G] it is not reasonable to suggest that the Scheme be considered even "effectively" permanent, as the duty for the Scheme operator to decommission the Scheme will not be removed.</p> <p>The Applicant notes that paragraph 2.10.66 of NPS EN-3 (November 2023) states that <i>"Time limited consent, where granted, is described as temporary because there is a finite period for which it exists, after which the project would cease to have consent and therefore must seek to extend the period of consent or be decommissioned and removed."</i> It is therefore entirely appropriate for the Applicant to describe any effects of the Scheme as being temporary.</p> <p>Paragraphs 2.10.150 and 2.10.151 of NPS EN1 (November 2023) state that <i>"The time limited nature of the solar farm, where a time limit is sought as a condition of consent, is likely to be an important consideration for the Secretary of State.</i></p> <p><i>The Secretary of State should consider the period of time the applicant is seeking to operate the generating station as well as the extent to which the site will return to its original state when assessing impacts such as landscape and visual effects and potential effects on the settings of heritage assets and nationally designated landscapes."</i></p> <p>The Applicant strongly disagrees with the assertion that the <i>"SoS is unable to rely upon the current ES due to the improper weight afforded to the temporary nature of the project and its reversibility"</i>.</p> <p>The Applicant is confident that the implications of the Scheme lifetime being up to a maximum of 60 years is suitably set out in <b>WB6.2.23_B Summary of Significant Effects Revision B [REP3-010]</b> and <b>8.2.3 Review of Likely Significant Effects at 60 Years [REP1- 060]</b>.</p> <p>The amount of weight to be given to the temporary and reversible nature of the Scheme in the planning balance is a matter for the Secretary of State to determine.</p> <p>The Applicant notes that the Secretary of State took into account the temporary and reversible nature of the solar development in the decision letter for the Longfield Solar Farm Order 2023.</p>

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				<p>Turning to consideration of temporary impacts on agricultural use, the SoS also agreed with the Inspector that the site could be returned to agricultural use at some stage, but that this should be afforded 'negligible' weight (para.41).</p> <p>WLDC acknowledges that the above decision has been made under the TCPA 1990, however the judgement made on the weight to be given to the temporary nature of solar projects is not specific to that particular process. It applies to the weight to be given to impacts regardless of the installed capacity of a project and the consenting regime under which is it determined.</p> <p>The SoS's view is clear regarding the weight to be given to temporary effects or reversibility for the 40 year project above. The West Burton Solar Project began examination seeking consent for the same period but is now seeking an addition 50% on that lifespan for a period of 60 years.</p> <p>The SoS provides a clear steer as to how decision makers should treat applications seeking temporary permission for such long periods of time. Projects of 40 years must be afforded 'little weight' in terms of claimed 'temporary' impacts, and 'negligible weight' to reversibility.</p> <p>As the West Burton Solar Project now seeks a 60 year consent lifespan, it is clear that the impacts of the scheme must be considered as permanent, with very little to no weight given to it being 'temporary' or 'reversible'. From this clarification emerges several key issues for the West Burton Solar Project application:</p> <ol style="list-style-type: none"> <li>1) The lifespan has been sought to be increased by 50% to 60 years without the applicant demonstrating how this significant extra lifespan has been taken account of in its Environmental Impact Assessment. The ES is silent on any discussion on what additional weight has been given to the additional 20 years and the implications this has on magnitude of effect and residual impacts.</li> <li>2) A further significant issue for the ES is that it relies upon temporal effects in order to justify reduction in impact magnitude and residual impacts.</li> <li>3) The applicant also relies upon temporary impacts to justify the acceptability of impacts in planning policy terms. Most notable in terms of landscape and visual impacts, agricultural land and in order to satisfy statutory duties to protect designated heritage assets. The applicant confirmed at the recent ISH that it is the temporary nature and reversibility of the project that is used to justify their conclusions on the above impacts in particular.</li> </ol> <p>Due to the weight the applicant has given to the temporary nature of the project and its reversibility, the conclusions reached in the ES and in terms of policy compliance must be called into question as to their validity. The SoS is unable to rely on the assessments as their dependence on temporary impacts has produced conclusions that have under-assessed the likely impacts.</p>	

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				<p>As stated in previous submission, WLDC has called for the applicant to provide a proper re-assessment of the impacts of the scheme to demonstrate how the additional timeframe has been accounted for in reached conclusion in the ES.</p> <p>WLDC there maintains its position that:</p> <ul style="list-style-type: none"> <li>i) the proposed application must be determined on the basis that impacts are effectively permanent;</li> <li>ii) the current ES applies too much weight to temporal effects and reversibility to the extent that it relies upon such factors in order to reduce conclusions on impacts and the acceptability of the scheme as a whole; and</li> <li>iii) The SoS is unable to rely upon the current ES due to the improper weight afforded to the temporary nature of the project and its reversibility.</li> <li>iv) A full re-assessment of impacts that correctly applies limited to no weight to temporary effects and revisability should be provided by the applicant.</li> </ul> <p>In the absence of such assessment, WLDC considers the application document to be flawed and the actual likely significant environmental impacts to be far greater than are currently reported.</p>	
SOI-24	2.2.8	7000 Acres [REP5-051]	<p><b>Permanent or Temporary Nature of Loss of Agricultural Land</b></p> <p>The ExA notes that LCC does not consider that the removal of agricultural land for a period of 60 years can be classed as temporary and this should be assessed as a permanent loss of agricultural land. REP3-042 states that <i>"A 60 year lifespan is all but equivalent to an entire life time and, on a human scale, is hardly "temporary" in the common use of this word. The effects of this longevity should be assessed as essentially permanent effects as that is how they are experienced in reality"</i>.</p> <p>IPs are invited to comment on the temporary nature and provide any evidence as to how they consider the relative degree of permanence V temporary loss.</p>	<p>7000Acres agrees with LCC that 60 years cannot be classed as temporary use. Some Planning Inspectors have even considered 40 years as "generational".</p> <p>EN-3 states that an upper limit of 40 years is typical. The Applicant's public consultation and the majority of the ES is based on a period of 40 years. The Applicant has not explained why 60 years is required.</p> <p>Research from the Welsh Government identifies that BMV land may be permanently damaged and never returned to its original state. In this case, the loss of farming land, especially BMV, is likely to be permanent.</p>	Please refer to the Applicant's responses to 2.1.4 (GC-08) and 2.2.6 (SOI-16) above.
SOI-25	2.2.9	Lincolnshire County Council (LCC) [REP5-042]	<p><b>Soil Health</b></p> <p>Through NE's work with the applicant on the SoCG, it has been agreed that a programme of soil health monitoring will be undertaken</p>	In order to monitor soil health, it is first necessary for there to be some form of survey or assessment of soil health pre-construction. This should include assessments of soil organic matter content, nutrient status, soil structure, pH, earthworm and microbial activity and general condition, as well as ALC grade(s).	Please refer to the Applicant's response to question 2.2.9 in <b>WB8.1.34 The Applicant's Response to ExA's Second Written Questions [REP5-039]</b> .

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			throughout the operation of the proposed development to better understand the impact of solar development on soil health. Please can both parties provide an update on the soil health monitoring programme and confirm the extent to which matters are resolved.		As stated by Natural England in <b>[REP5-062]</b> they "do not have any standard soil health monitoring specifications. However, we have advised the applicant of ongoing work by Lancaster University with regard to field trials (10 solar farms across the uk) which have been completed and are due to be published shortly, which may provide a useful basis. NE may be able to provide comment on the programme of monitoring where necessary."  A programme of monitoring is committed in <b>WB7.14_D Outline Operational Environmental Management Plan Revision D [REP5-021]</b> through Schedule 2, Requirement 14 in <b>WB3.1_G Draft Development Consent Order Revision G [EX6/WB3.1_G]</b> .
SOI-26	2.2.9	Natural England <b>[REP5-062]</b>	<b>Soil Health</b>  Through NE's work with the applicant on the SoCG, it has been agreed that a programme of soil health monitoring will be undertaken throughout the operation of the proposed development to better understand the impact of solar development on soil health. Please can both parties provide an update on the soil health monitoring programme and confirm the extent to which matters are resolved.	NE welcome the commitment made by the applicant to set out a programme of soil health monitoring in the Detailed OEMP, and consider this matter resolved. At present, Natural England do not have any standard soil health monitoring specifications. However, we have advised the applicant of ongoing work by Lancaster University with regard to field trials (10 solar farms across the uk) which have been completed and are due to be published shortly, which may provide a useful basis. NE may be able to provide comment on the programme of monitoring where necessary.	Please see response to SOI-25 above.
<b>2.3 Biodiversity and Ecology</b>					
ECO-01	2.3.2	Lincolnshire County Council (LCC) <b>[REP5-042]</b>	<b>Biodiversity Net Gain</b>  The ExA notes that Requirement 9 now provides that the BNG Strategy must include details of how the strategy will 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 for all of the authorised development during the operation of the authorised development, and the metric that has been used to calculate that those percentages will be reached.  The units quoted differ from those set out in e.g. the Planning Statement, in order to act	In so far as there is a shortfall from the % relied upon in the planning statement, less weight should be afforded even on the Applicant's case.	Please refer to the Applicant's response to question 2.3.2 in <b>WB8.1.34 The Applicant's Response to ExA's Second Written Questions [REP5-039]</b> .  The Applicant considers that the proposed substantial Biodiversity Net Gain (BNG) resulting from extensive habitat enhancement and creation would confer a key benefit from the Scheme on local biodiversity. However, the Applicant is mindful that BNG as an initiative is relatively new and not yet mandatory for NSIPs. The application of any updated BNG calculation methodologies as may be required by Defra in the intervening period between now and the commencement of construction may give rise to unforeseen changes in BNG scores upon finalisation of the BNG strategy following DCO consent, despite the actual proposals and

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			<p>as a 'buffer' in the event that circumstances change over time. Please can the Applicant provide a comment on the BNG Units secured within the dDCO and rationale as to the specific level of buffer selected. Please can IPs comment on the same.</p> <p><i>Note Question 2.5.12 addresses the BNG Requirement 9 dDCO approach to wording.</i></p>		<p>measures remaining the same. Therefore, the Applicant considers it proportionate to include a buffer in the fixed percentages referred to in the draft DCO [EN010132/EX6/WB3.1_G] as failure to comply is automatically an offence.</p> <p>This reflects the approach taken in the final draft DCO submitted as part of the Mallard Pass Solar Farm examination.</p> <p>However, the Applicant has committed to delivering all of the biodiversity enhancement measures set out in the Outline LEMP [EN010132/EX6/WB7.3_E] and this should be given weight in the planning balance.</p>
ECO-02	2.3.2	7000 Acres [REP5-051]	<p><b>Biodiversity Net Gain</b></p> <p>The ExA notes that Requirement 9 now provides that the BNG Strategy must include details of how the strategy will 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 for all of the authorised development during the operation of the authorised development, and the metric that has been used to calculate that those percentages will be reached.</p> <p>The units quoted differ from those set out in e.g. the Planning Statement, in order to act as a 'buffer' in the event that circumstances change over time. Please can the Applicant provide a comment on the BNG Units secured within the dDCO and rationale as to the specific level of buffer selected. Please can IPs comment on the same.</p> <p><i>Note Question 2.5.12 addresses the BNG Requirement 9 dDCO approach to wording.</i></p>	<p>7000Acres highlight the point that there is very little experience or track record of the use of the BNG methodology, and while a number of case studies have been published, e.g. by Natural England, these are hypothetical illustrations of the methodology, and cover relatively small areas of development (To rely on such an unproven methodology in the face of development on such unprecedented scale would seem to undermine the potential to accurately estimate the potential BNG improvements across the various categories highlighted by the ExA.</p> <p>In combination with such evidence as the recent short video highlighting the conditions during the construction of Cleve Hill Solar Farm, the environmental damage to the area during construction is extensive. West Burton will be over twice the land area as the Cleve Hill scheme, once "over planting" has been accounted for, and the in-combination effects of other NSIP schemes in the region mean that the assumed recovery of habitats and species necessary to assure the BNG gains cannot be assumed.</p> <p>Notwithstanding this, Natural England Report NEER012 reviews the impact of solar farms on wildlife and ecology. It concludes that "<i>The lack of evidence available relating to the ecological impact of solar farms is concerning</i>" and that "<i>more needs to be done to understand the interaction between these new [renewable energy] technologies and the ecology that they are ultimately designed to protect</i>".</p> <p>7000Acres believe that it is, in effect, a huge experiment to rely on the BNG methodology to deliver actual improvements across such a vast and unprecedented area of development as the WBSP, particularly when considered alongside other super large-scale ground mounted solar developments proposed in the immediate region. There is also a low base of confidence in such schemes having historically delivered ecological improvements to mitigate harms from infrastructure development.</p>	<p>The Biodiversity Net Gain assessment process includes a commitment to the ongoing monitoring and maintenance of proposed and retained habitats for the life of the Scheme. A key component of this is the identification of any remedial work which might be necessary in order to achieve the agreed target condition of proposed and retained habitats. The BNG assessment calculations also build in a 'time to condition' allowance for proposed habitats from the point of creation during or at the end of the construction phase. These provisions are the result of many years of consultation and refinement of the Defra BNG metric and assessment process prior to the ratification of the Defra Statutory Metric. Consequently, the Applicant is satisfied that sufficient checks and balances are inherent in the BNG process that mean the benefits identified within the BNG assessment can be relied upon by the ExA and Secretary of State and will be secured by the application of Requirement 9 in Schedule 2 of the <b>draft DCO [EX6/WB3.1_G]</b>. Furthermore, the 'buffer' in the Habitat, Linear and River Units proposed (see response to ECO-01, above) provides further comfort that the proposed percentages reflect deliverable and realistic biodiversity benefits.</p>

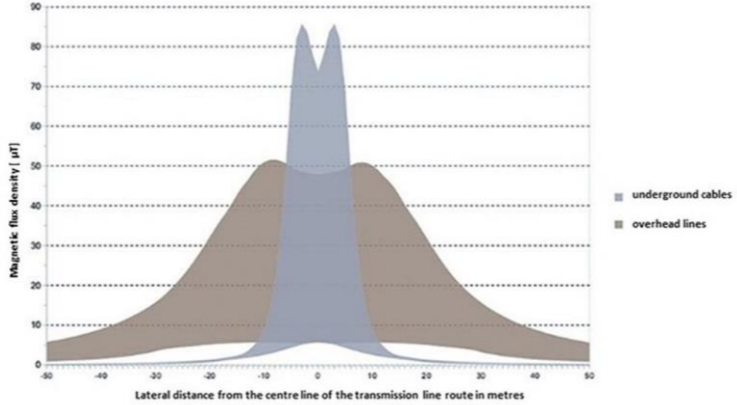
Ref	ExA FWQ's	Respondent	Question	Response	Applicant's Comment
				7000Acres therefore would therefore propose that little weight is afforded to claims for the WBSP to improve BNG, without significantly more evidence and research into the effects of such large-scale solar installations on land in the UK.	
ECO-03	2.3.2	Roy Clegg [REP5-083]	<p><b>Biodiversity Net Gain</b></p> <p>The ExA notes that Requirement 9 now provides that the BNG Strategy must include details of how the strategy will 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 for all of the authorised development during the operation of the authorised development, and the metric that has been used to calculate that those percentages will be reached.</p> <p>The units quoted differ from those set out in e.g. the Planning Statement, in order to act as a 'buffer' in the event that circumstances change over time. Please can the Applicant provide a comment on the BNG Units secured within the dDCO and rationale as to the specific level of buffer selected. Please can IPs comment on the same.</p> <p><i>Note Question 2.5.12 addresses the BNG Requirement 9 dDCO approach to wording.</i></p>	It is noted that the Applicant has still not considered the Effect of EMF and Electric Fields on Flora and Fauna, Wildlife and Biodiversity.	The effects of electromagnetic fields were scoped out of the assessment at EIA scoping stage (see issue ID 3.12.1 of EIA Scoping Opinion document [APP-068]). Following representations from the Environment Agency concerning high voltage cabling crossing beneath the River Trent, a risk assessment on the potential for effects from EMF on certain species of migratory fish was carried out which concluded that risks were likely to be low. Furthermore, in agreement with the EA, a commitment was made to undertake a research study to monitor potential impacts on fish from EMF at this crossing point. Consequently, the Applicant believes that the pertinent potential effects of EMF have been adequately considered. The Applicant can confirm that this matter has been agreed with the Environment Agency as set out in matter ECO-12 in the final agreed and signed <b>Environment Agency Statement of Common Ground Revision B [EX6/WB8.3.5_B]</b> which is submitted at Deadline 6.
ECO-04	2.3.4	Environment Agency [REP5-056]	<p><b>EMF Risk Assessment</b></p> <p>The Environment Agency's views are sought on the submitted 'Risk Assessment on EMF Impacts on Fish' document which is appended to Appendix 1 of the Applicant's Response to Written Representations at Deadline 1 Part 1 [REP3-034]. Both the Environment Agency and the Applicant are requested to provide a progress update and progress through an updated SoCG at Deadline 5.</p>	<p>As you will be aware from the letter dated 31 January 2024 that we submitted to your hearing on 7th February 2024, in terms of the impacts of Electro Magnetic Fields (EMF) on fish, further discussions have taken place with the applicant on this topic in connection with the proposed Cottam solar project.</p> <p>In connection with this, we concluded, based on the information he has provided, that the works would prove a low risk to fish.</p> <p>However, as this is an area of very little research, we cannot say there will categorically be no risk to fish populations. Accordingly, we have asked the Applicant for that project to agree to undertake a scheme of monitoring to corroborate the predicted impacts of EMF on fish.</p> <p>In our representation for the Cottam DCO, we had asked for this scheme of monitoring to be secured via a requirement and therefore asked for the same to be included in the West Burton DCO. However, since we submitted our letter on 31st January, there have been further discussions on this topic with the Applicant</p>	The Applicant can confirm that this matter has been agreed with the Environment Agency as set out in matter ECO-12 in the final and signed <b>Environment Agency Statement of Common Ground Revision B [EX6/WB8.3.5_B]</b> which is submitted at Deadline 6.

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				<p>for the Cottam solar project. As a result, it has been agreed to secure this scheme of monitoring via the outline Operational Environmental Management Plan (OEMP), which the Environment Agency will be a consultee on, rather than as a direct requirement of the DCO.</p> <p>It is considered that the same should apply to West Burton and we note that wording to cover this has already been included in the Outline Operational Environmental Management Plan Revision C February 2024 submitted to you at Deadline 4.</p> <p>It is intended that this matter will be concluded via the Statement of Common Ground to be submitted in time for Deadline 6.</p>	
ECO-05	2.3.4	Roy Clegg [REP5-083]	<p><b>EMF Risk Assessment</b></p> <p>The Environment Agency's views are sought on the submitted 'Risk Assessment on EMF Impacts on Fish' document which is appended to Appendix 1 of the Applicant's Response to Written Representations at Deadline 1 Part 1 [REP3-034]. Both the Environment Agency and the Applicant are requested to provide a progress update and progress through an updated SoCG at Deadline 5.</p>	<p>It is understood that the EA has requested that monitoring of the location of the river crossing for impacts on fish is undertaken pre and post construction (see response to WQ 2.13.11 Cottam Solar Project dated January 2024) with the imposition of the following Requirement on the DCO:</p> <p>(1) No part of the electrical cables permitted under Work No. 6B shall become operational until a written electromagnetic field monitoring strategy for the River Trent has been submitted to and approved by the Environment Agency.</p> <p>(2) The electromagnetic field monitoring strategy must include, but not be limited to –</p> <p>(a) an appropriate mechanism for surveying any behavioural responses from migratory fish species passing through the area of the cable crossing under the River Trent.</p> <p>(b) a mechanism for relaying the results of the surveys to the Environment Agency on a regular basis; and</p> <p>(c) proposed periods and timings during which surveys will be undertaken to coincide with the main migratory periods for species such as salmon and lamprey.</p> <p>(3) The monitoring strategy must be implemented as approved.</p> <p>It is suggested there has been little research on EMF, but this is not so. For almost 100 years there have been many research papers and referenced in submitted WR's in respect of the effect of EMF on Marine Life and specifically fish. The Applicant has also referenced these effects in their submissions.</p> <p>What the Applicant has failed to do, is demonstrate that EMF can be stopped or mitigated from this application and the cumulative impact from all solar schemes sharing the same cable crossing of the River Trent.</p> <p>This is relatively easy to do. All the Applicant needs to do is bury a length of prescribed high voltage cable to a depth of 5 metres and measure the strength of the EMF and then determine the accumulated impact from all solar scheme</p>	<p>The conclusions of the risk assessment on the potential for impacts of EMF on fish at the River Trent crossing were that the likelihood of significant effects was low [Appendix 1 of <b>REP3-034</b>]. This is due to factors including the cable burial depth, the small zone of potential effect and the low risk of navigational interference due to the life stages of the fish species in question when likely to be present at the crossing point. Consequently, monitoring to gather information during the operation of the Scheme was considered to be the proportionate and responsible course of action to take. This matter has been agreed with the Environment Agency as set out under point ECO-12 in the final and signed <b>Environment Agency Statement of Common Ground [EX6/WB8.3.5_B]</b>.</p>

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				<p>cables crossing the River Trent. This must be addressed PRIOR to any approval, or conditional approval of the project.</p> <p>The EA request of undertaking monitoring pre and post construction is illogical. What information and conclusion can be gathered preconstruction? And what will happen if post construction information and conclusions indicate an effect of EMF on Marine Life and Fish? Will construction, and commissioning and operation be stopped?</p> <p>If any testing and monitoring is undertaken, it must be seen to be independent.</p> <p>The River Till and the other 30 or so number water course crossings need to be considered in any conclusions., The Applicant has used many chosen words in submissions which do not have supported evidence.</p>	
ECO-06	2.3.5	Environment Agency [REP5-056]	<p><b>Cable Depth</b></p> <p>The Applicant concludes that burying the cables to a minimum depth of 0.9m and given the limited span of the corridor this would provide sufficient mitigation to prevent adverse effects on aquatic life and in particular protected species. The Outline Design Principles provide a minimum buried depth below the bed of the river Trent of 5m. Please can IPs comment on the potential impact on aquatic life from cable depth of 5m.</p>	<p>We are unclear why a depth of 0.9m is now being mentioned and which document concludes this depth is acceptable. All of the discussions to date seem to relate to the cable being 5m deep below the river bed. We have found a reference to a depth of 0.9m on page 7 of the appendix 1 to the Applicant's Responses to Written Representations and other submissions at Deadline 1 Part 1 Prepared by Lanpro Services (January 2024) which refers to a National Grid 400kV 0.9m buried cable. However, the conclusion to this appendix (in paragraph 2.4.1) says 'Electric fields generated by the proposed cable are not likely to be perceived beyond the armouring of the cable itself, and certainly not beyond the 5m buried depth below the riverbed, therefore potential effects of electric fields on fish are not considered likely'.</p> <p>We believe the greater the depth below the river bed that the cable is buried it will reduce the impact upon fish. Therefore, a cable at 5m would be our preference.</p> <p>This would also seem to be consistent with the depth discussed in connection with the Cottam solar farm project and the statement in 1.1.3 of appendix 1 to the Applicant's Responses to Written Representations and other submissions at Deadline 1 that the installation of 400kV cables will be within the same location underneath the River Trent as part of a shared grid connection corridor.</p> <p>Notwithstanding this, we would request an absolute minimum of 1.5m depth below the Trent and that all works are in accordance with Exemption FRA3. A 0.9m depth would be unacceptable on flood risk grounds. Full requirements are set out below, and as per Exempt flood risk activities: environmental permits - GOV.UK (<a href="http://www.gov.uk">www.gov.uk</a>):</p> <ul style="list-style-type: none"> <li>You cannot install a pipe crossing by excavating an open trench through the river.</li> <li>the service crossing is within 10 degrees of perpendicular to the direction of flow in the main river</li> </ul>	<p>Please refer to the Applicant's response to question 2.3.5 in <b>WB8.1.34 The Applicant's Response to ExA's Second Written Questions [REP5-039]</b>.</p> <p>In <b>WB7.13_D Concept Design and Parameters and Principles Revision D [REP5-094]</b> it confirms that the depth of cables under the River Trent will be a minimum of 5m.</p>



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				<ul style="list-style-type: none"> <li>the service crossing is at least 1.5m below the riverbed along its whole length, and the same height is maintained for at least 5m beyond each bank (measured from the top)</li> <li>the distance from the launch and reception pits to the landward side of each bank of the main river is: <ul style="list-style-type: none"> <li>8m or more in the case of a non-tidal main river</li> <li>16m or more in the case of a tidal main river</li> </ul> </li> <li>the service crossing does not pass through any bank, culvert, remote defence or river control works on the main river or through any sea defence</li> <li>the service crossing is 50m or more upstream of any impoundment or artificially raised channel</li> <li>you erect permanent hazard markers on both banks of the main river</li> <li>you remove from the flood plain all excavated material not re-used on the site of the works</li> <li>your works do not disturb the bed and banks of the main river</li> </ul>	
ECO-07	2.3.5	Natural England [REP5-062]	<p><b>Cable Depth</b></p> <p>The Applicant concludes that burying the cables to a minimum depth of 0.9m and given the limited span of the corridor this would provide sufficient mitigation to prevent adverse effects on aquatic life and in particular protected species. The Outline Design Principles provide a minimum buried depth below the bed of the river Trent of 5m. Please can IPs comment on the potential impact on aquatic life from cable depth of 5m.</p>	<p>Natural England note the potential for impacts to aquatic life from the installation and operation of cables under the River Trent. NE consider that a depth of at least 5m is likely to be sufficient in avoidance of any significant effects and has no specific comment to make.</p> <p>Nonetheless, as set out in NPS EN-3 section 2.8.247, NE would note that monitoring of aquatic activity and EMF in the River during the operation of the project may provide evidence to inform future EIAs.</p>	<p>Please refer to the Applicant's response to ECO-06 above.</p> <p>In <b>WB7.13_D Concept Design and Parameters and Principles Revision D [REP5-094]</b> it confirms that the depth of cables under the River Trent will be a minimum of 5m.</p> <p>Furthermore, in agreement with the EA, a commitment was made to undertake a research study to monitor potential impacts on fish from EMF at this crossing point.</p>
ECO-08	2.3.5	Roy Clegg [REP5-083]	<p><b>Cable Depth</b></p> <p>The Applicant concludes that burying the cables to a minimum depth of 0.9m and given the limited span of the corridor this would provide sufficient mitigation to prevent adverse effects on aquatic life and in particular protected species. The Outline Design Principles provide a minimum buried depth below the bed of the river Trent of 5m. Please can IPs comment on the potential</p>	<p>I refer to my previous WR on the Impact of EMF on Marine Life, Flora and Fauna, and Biodiversity in the West Burton Solar Project and would further add the following representations.</p> <p>The developer has chosen to comment on human life and has not made any consideration of the significant impact of EMF on marine life, flora and fauna with wildlife, and biodiversity, where all the later are intrinsically linked to each other.</p> <p>A myriad of cable runs in the project resulting in connections carrying up to 400Kv to transport electricity from the solar panels to the National Grid using transformers, inverters etc., all of which transmit EMF's.</p>	<p>Please refer to the Applicant's response to HW-07 below, and to the Applicant's response to previous comments made by Mr Clegg [REP1A-062] at ECO-01 in <b>WB8.1.19 Response to Written Representations at Deadline 1 Part 3 [REP3-036]</b>.</p>

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			<p>impact on aquatic life from cable depth of 5m.</p>	<p>When crossing under the River Trent the Electromagnetic Fields will be significantly stronger, and the effect of EMF will be distanced further away by at least 7 metres from the central core of the high voltage cables.</p> <p>A magnetic field measuring 57.5 milligauss immediately beside a 230 kilovolt transmission line measures just 7.1 milligauss at 100 feet, and 1.8 milligauss at 200 feet, according to the World Health Organization in 2010. The 400Kv volts power line will be significantly stronger.</p> <p>An Electromagnetic Field is a circular vector field that radiates out centrally from its stronger central core with a magnetic influence on moving electric charges, electric currents, and magnetic materials.</p> <p>The electromagnetic fields will not be mitigated or stopped by covering over or burying. In effect, the EMF will at its core, distanced 5.0 metres below the riverbed, have a magnetic flux density of 50 - 70 uT, with an effective band width across the River Trent calculated at 12 metres.</p> <p>The diagram below shows the effect of EMF field strength set against underground and overhead cables and lateral core and illustrates the maximum values expected at the examined route sections during maximum operating conditions of a SINGLE typical 400kV power line.</p>  <p>The effect of EMF will be significantly impacted by any additional power line cable crossings of the River Trent and other watercourses.</p> <p>The Impact of EMF on Marine Life, Flora and Fauna and Biodiversity are well researched, documented and detailed in the WR's submitted previously.</p> <p>The Water Framework Directive, the IUCN Red List, the OSPAR, the European Eel Regulations (100/2007), the Eels(England and Wales) Regulations, the Canal Rivers Trust and the Notts Biological &amp; Geological Records Centre list threatened, endangered and protected marine species including the Allis Shad, Brook Lamprey, Bullhead, Common / European Sturgeon, Crucian Carp, Eel, River Lamprey, Sea Lamprey, Smelt, Spined Loach, Twaite Shad, White Clawed</p>	

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				<p>Crayfish, Brown Trout and the Atlantic Salmon all found in the Rivers Trent and Till.</p> <p>Many species of flora and fauna, because of unique physiologies and habitats, are sensitive to exogenous EMF in ways that surpass human reactivity, are highly variable, largely unseen, and a possible contributing factor in species extinctions.</p> <p>EMF has an adverse effect on orientation, migration, food finding, reproduction, mating, nest and den building, territorial maintenance, defence, vitality, longevity and survivorship itself. Wildlife loss is often unseen and undocumented until tipping points are reached. Is the Developer, Examiner and the Secretary of State satisfied that there is no risk to any protected species from the effect of EMF and its features because of this and other similar Project?</p>	
ECO-09	2.3.6	7000 Acres <b>[REP5-051]</b>	<p><b>Decommissioning – Significance of Effects</b></p> <p>The significance of effects for decommissioning are not listed in the ES. Can the Applicant explain how decommissioning effects have therefore been considered and assessed as the ES should assess the worst case scenario for all stages of the Proposed Development.</p> <p>If it considers that a reasonable worst-case is that the effects at decommissioning would be the same as during the construction phase, please explain how it has accounted for future changes beyond the construction phase. Also, please set out whether or not the potential for significance of effects may increase over time, and how this has been included in the assessment.</p>	<p>During Research by the Welsh Government<sup>9</sup> it was identified that agricultural land can be permanently damaged by solar installations and it might never be possible to revert the land to its original condition. The Applicant has failed to address the following issues identified in the research:</p> <ul style="list-style-type: none"> <li>• Supporting piles corrode and break during extraction, leaving metal structures in the soil.</li> <li>• Extracting piles leaves voids in the soil.</li> <li>• Galvanised piles contaminate the soil. There is evidence that high zinc levels in soils affects the soil biological activity (Moffett et al, 2003).</li> <li>• Different soil textural classes have more resilience to structural damage and are more responsive to remediation during soil handling. Silt loam soils and heavy soils with &gt;27% clay content have low resilience to damage. Soil should only be handled or trafficked when as dry and as friable as is practicable. If handled or trafficked in adverse conditions damage to the soil structure can easily occur.</li> <li>• Developers may consider that the scrap value of the panels etc on site will cover the costs of decommissioning. There are few contingency plans in place and should operators encounter financial instability and the economics of solar PV change during the project life and trigger early decommissioning then this may influence the reversion of the site to agriculture and other changes of land use may be sought.</li> <li>• The management history of non-BMV agricultural land will influence the baseline soil reference values and the potential carbon capture benefit of solar PV sites. There may also be greater environmental risks during construction, operation and decommissioning on non-BMV agricultural land. Soils may be at field capacity or have a clayey or silty soil texture with a landform resulting in surface water runoff. In such instances there may be a greater risk of soil erosion and pollution of water courses.</li> </ul>	<p>In response to the specific comments raised, the Applicant's position is set out below:</p> <ol style="list-style-type: none"> <li>1- No such instances have been reported. Should any pile snap during extraction it would be a simple operation to excavate and extract any remaining pile within cultivation depth. Any remaining pile below this depth could also be excavated or left as a slim and inert vertical structure that would have no discernible effect on agricultural land management.</li> <li>2- For the narrow piles used, no void from an extracted pile could be expected to remain following the drilling of the first arable crop after decommissioning.</li> <li>3- This research applies to zinc salts applied to land with slurry and/or agrichemicals returned to land (such as antifungal foot bath for livestock) and not galvanised piles. Such piles have been used for many years as fence posts in countries where wooden fence posts are not suitable, without apparent problems.</li> <li>4- The SMP WB6.3.19.2_A ES Appendix 19.2 Outline Soil Management Plan Revision A <b>[REP3-016]</b> includes measures to confine soil handling and trafficking to periods when the soil consistence is friable or drier.</li> <li>5- The Applicant confirms that the following is secured through Requirement 21 of Schedule 2 of <b>3.1_G Draft Development Consent Order</b></li> </ol>

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				None of these issues identified in the research apply to the construction phase, and so a straight read-across of the impacts from construction to decommissioning are not valid. In not considering the decommissioning phase of their scheme, the Applicant has not provided a reasonable worst-case assessment of the harm their scheme will cause to the region, so yet again is not compliant with Advice Notice Nine.	<p><b>Revision G [EX6/WB3.1_G]:</b> "Within 12 months of the date that the undertaker decides to decommission any part of the authorised development, the undertaker must submit to the relevant planning authority for that part a decommissioning plan for approval" and that "The decommissioning plan must be substantially in accordance with the outline decommissioning statement." The Applicant acknowledges that non-compliance with the terms of the Order, inclusive of noncompliance with any management plans secured through requirement, is a criminal offence, under section 161 of the Planning Act 2008. Permanent vegetated cover of the soil prevents the detachment of soil particles by water drop impact, reducing the risk of soil erosion compared to arable land. Improved rainfall infiltration will reduce surface runoff, and the presence of a year round green cover also slows any surface runoff that does occur. The risk of soil erosion from a solar farm is therefore significantly reduced compared to arable land. Article 47 of <b>3.1_G Draft Development Consent Order</b></p> <p><b>Revision G [EX6/WB3.1_G]</b> requires a parent company guarantee or other form of security that has been approved by the Secretary of State to be in place before the compulsory acquisition and temporary use powers can be exercised.</p> <p>6- At decommissioning, the site benefits from a mature green sward stabilising and protecting the soil surface from any disturbance during works. For the soil resource there is no heightened risk of degradation at decommissioning compared to the (low and managed) risk during the construction phase.</p>
ECO-10	2.3.6	Roy Clegg [REP5-083]	<b>Decommissioning – Significance of Effects</b> The significance of effects for decommissioning are not listed in the ES. Can the Applicant explain how decommissioning effects have therefore been considered and assessed as the ES	[No response in submission]	N/A

Ref	ExA FWQ's	Respondent	Question	Response	Applicant's Comment
			<p>should assess the worst case scenario for all stages of the Proposed Development.</p> <p>If it considers that a reasonable worst-case is that the effects at decommissioning would be the same as during the construction phase, please explain how it has accounted for future changes beyond the construction phase. Also, please set out whether or not the potential for significance of effects may increase over time, and how this has been included in the assessment.</p>		
ECO-11	2.3.7	Lincolnshire County Council (LCC) <b>[REP5-042]</b>	<p><b>Waste</b></p> <p>Table 3.13 of the oOEMP (Rev C) [REP4-054] has been updated to refer to the waste management strategy which <i>"will be provided as a standalone document requiring approval from the Waste Management Authority as set out under Requirement 14 of the DCO [EX4/WB3.1_E] to ensure operational waste is managed suitably, and that waste arisings are sent for handling at facilities within the waste local authorities that have capacity to do so without adversely impacting upon their capacity to handle waste arisings for all other waste streams in the authority area"</i> Further amendments set out topics to be included.</p> <p>LCC has previously requested additional assurances relating to future waste arising from the project. Please can the Applicant and LCC comment on progress, and set out LCC as waste authority concerns regarding impact of waste both from WBSP and also cumulatively.</p>	<p>As with other NSIPs, the applicant has committed (in the oOEMP) to producing a Waste Management Strategy using the format which the Council suggested. In terms of Requirement 14 of the draft DCO the Council would request the use of the term 'Waste Planning Authority' rather than Waste Management Authority' The Council notes that this doesn't explicitly mention an assessment of the cumulative impacts of all known/proposed projects, so the Council would like to see this added. In terms of concerns on the future waste handling capacity the potential impacts from this scheme and others is unknown at this stage but could be significant and this is why the Council is seeking this information now so that when the Council updates its Waste Needs Assessment as part of the on-going review of the Minerals and Waste Local Plan this can be taken into account and planned for in the need for additional waste processing facilities.</p>	<p>In the latest draft DCO <b>[EN010132/EX6/WB3.1_G]</b>, Requirement 14 in Schedule 2 refers to the "waste planning authorities".</p> <p>The Waste Management Strategy proposed within the oOEMP <b>[REP5-020]</b> (and thereby secured by Requirement 14 of the draft DCO <b>[EN010132/EX6/WB3.1_G]</b>), must take into account the waste authorities' 'capacity to handle waste arisings for all other waste streams in the authority area', which includes waste produced by other solar schemes for which information is available at the time.</p>
ECO-12	2.3.7	7000 Acres <b>[REP5-051]</b>	<p><b>Waste</b></p> <p>Table 3.13 of the oOEMP (Rev C) [REP4-054] has been updated to refer to the waste management strategy which <i>"will be provided as a standalone document requiring approval from the Waste Management Authority as set out under Requirement 14 of the DCO</i></p>	<p>Please see our response to Q 2.9.3.</p> <p>The Applicant has understated the replacement rate of the PV panels. In particular they have taken no account of replacing panels on economic grounds. A reasonable worst-case assessment is that the number of panels replaced will be multiples of the numbers claimed by the Applicant in their ES. A similar comment also applies to other electrical equipment, including the BESS where a current economic life of 10 years is standard, not the 20 years stated in the ES.</p>	<p>The Applicant refers to its 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 Response at Issue Specific Hearing 3 and Responses to Action Points [REP4-070]</b>.</p>

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			<p>[EX4/WB3.1_E] to ensure operational waste is managed suitably, and that waste arisings are sent for handling at facilities within the waste local authorities that have capacity to do so without adversely impacting upon their capacity to handle waste arisings for all other waste streams in the authority area" Further amendments set out topics to be included.</p> <p>LCC has previously requested additional assurances relating to future waste arising from the project. Please can the Applicant and LCC comment on progress, and set out LCC as waste authority concerns regarding impact of waste both from WBSP and also cumulatively.</p>		<p>Please refer to the Applicant's response to the ExA's Second Written Question 2.9.3 [REP5-039] in relation to replacement rates.</p> <p>The <b>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>
ECO-13	2.3.8	7000 Acres [REP5-051]	<p><b>Opportunity Cost of Renewable Energy Sources</b></p> <p>How has the loss of arable crops which are used for production of renewable energy been taken into account in the assessment of effects on climate change in the Environmental Statement Chapter 7: Climate Change Revision A [REP1-012].</p>	<p>There are two primary dimensions to cover when considering the opportunity cost of renewable energy crops displaced by the proposed development:</p> <ul style="list-style-type: none"> <li>i. The absolute quantity of renewable energy associated with displaced energy crops.</li> <li>ii. The relative value of the energy displaced through the loss of energy crops versus that provided by solar.</li> </ul> <p>While the volume of electricity produced from the land by solar will be higher than that from displaced energy crops, the loss of existing biofuel-derived energy must be considered as a reduction in the benefit claimed by the developer, as the net effect of the scheme will be a gain in solar renewable energy, but a loss of biofuel-derived energy.</p> <p>The Applicant has based their greenhouse gas assessment on the volume of green energy produced by the development without considering the displaced renewable energy, therefore the Applicant's current assessments have overstated the decarbonisation benefit of the scheme.</p> <p>Furthermore, the nature of the energy has not been considered, in that crop-derived biofuels are produced in gas and liquid forms which can be stored long-term, e.g. for winter heating demand, or transported in a way that can decarbonise other sectors of the economy, e.g. road, rail, aviation and shipping. For example, the UK has a mandate for using 10% Sustainable Aviation Fuel10 (SAF), i.e. biofuel, by 2030. This illustrates the much greater flexibility of bio-fuel derived energy, in comparison to solar, which is intermittent and much less flexible. Solar produces most power when it is least needed in the UK, and currently, it can only be stored in relatively small volumes to power for short durations using BESS technology. As a result, the relative usefulness and value of</p>	<p>Section 7.6 of <b>Statement of Need [APP-320]</b> includes an analysis of the energy generated per hectare from various energy schemes. The table shows that growing crops for energy (biogas) generates between just 1.5% and 3% of the energy per hectare than does solar. This is an incredibly small amount and is not significant in relation to the significant quantities of energy generated by solar panels on the same area. This analysis would obviously be relevant only to fields which are entirely dedicated to biofuels crops over the proposed operational period of the Scheme.</p> <p>Appendix B to [REP1-052] (Chapter 8 – Decarbonisation can maintain or enhance Security of Supply) describes the changing nature of the UK's electricity system and therefore why it is not accurate to say that "Solar produces most power when it is least needed in the UK".</p> <p>The Scheme proposes to connect to the National Electricity Transmission System (NETS). By doing so, the zero-carbon electricity generated at the Scheme will be immediately accessible to consumers throughout the UK, either to power their appliances, charge their cars, heat their homes, electrolyse water to produce hydrogen or be stored for later use. Using the existing NETS is an efficient and effective method of transmitting energy throughout our country.</p>

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				a unit of biofuel derived energy will, on average, be much greater than an equivalent volume of solar energy. Not considering the displaced energy production and its use in delivering flexible energy are significant omissions in the material produced by the Applicant.	<p>Solar remains a critical technology to support the UK's transition to net zero. The electricity produced by Solar facilities produces no marginal carbon emissions. If that electricity is stored rather than consumed immediately – either in batteries for short term use, or in the future as hydrogen through hydrogen electrolysis – then again, no marginal carbon emissions will be released during the storage or release process. The generation of energy through such methods is therefore of critical importance to UK net zero. This is in contrast to biofuels which release carbon emissions when they are combusted.</p> <p>It has been assumed that there are no emissions generated by the current use of the land within the Climate Change assessment, as a conservative approach. With regard to biofuels, the most productive biofuel crops need over an order of magnitude greater area of land to generate the equivalent MWh of power per year as a unit area of solar, but without the additional benefit of livestock grazing and recovery of soil health. Solar has therefore significant advantages over all biofuel crops.</p>
<b>2.4 Compulsory Acquisition, Temporary Possession and Other Land or Rights Considerations</b>					
CA-01	2.4.5	7000 Acres [REP5-051]	<p><b>Funding Statement</b></p> <p>The Applicant's position in relation to project funding is set out in the Funding Statement [AS-045], with further detail provided in response in relation to WQ 1.4.14 [REP3-038] in relation to the availability of funding. In terms of the availability and adequacy of funding, the Applicant is asked to further comment on key risks associated with securing funding, including the implications of external matters, including recent global events, supply chain issues and fluctuations in prices and interest rates for the ability to fund the Proposed Development. Further, the Applicant is asked to comment on the measures on place to prevent the exercise of compulsory acquisition powers until the Secretary of State has approved a form of security from the Applicant.</p>	<p>7000Acres is extremely concerned over the statement in [AS 045] that the Macquarie Group now has a 50% share in Island Green Power.</p> <p>Macquarie has a dubious record in the UK, where it has shown extremely poor stewardship of public utilities, such as Thames Water and Southern Water.</p> <p>Due to past conduct by a major investor, the need for a Decommissioning Bond becomes even more important.</p>	<p>Please refer to the answer given to part b_and c of ExQ 1.4.14 in Applicant Response to ExA First Written Questions [REP3-038] regarding decommissioning.</p>

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CA-02	2.4.12	Network Rail Infrastructure Limited <b>[REP5-063]</b>	<p><b>Network Rail</b></p> <p>The ExA requests that the parties please provide a further update on the voluntary property agreement with Network Rail being sought by the Applicant, noting the submission from Network Rail Infrastructure Ltd in response to first written questions [REP3-051], and the Applicant's update provided at CAH1 [REP4-069], which included reference to the importance of such agreements being in place before any limitations on compulsory acquisition powers in protective provisions are agreed to.</p>	<p>NR have recently received the Heads of Terms in respect of the Property Agreements and are currently reviewing the same, before reverting to the Applicant. The Property Agreements cannot be agreed or progressed by NR until the Heads of Terms have been agreed upon.</p> <p>It's also noted that it was stated at the Written Summary of the Applicant's Oral Submissions &amp; Responses at the Compulsory Acquisition Hearing 1 that NR's preferred set of Protective Provisions have been included in the most recent version of the draft Order. This, however, is incorrect. At <a href="#">Annex 1 [REP5-063]</a> NR have included a comparison version of the Protective Provisions that are currently in the order, against what NR require, and the blue text shows what additions are required by NR in order for the railway to be adequately protected.</p> <p>Further, and for the avoidance of doubt, the Protective Provisions that are required by NR for the protection of railway assets are included at <a href="#">Annex 2 [REP5-063]</a>.</p> <p>As can be seen by the comparison (Annex 1), the Applicants form of Protective Provisions (at 118) simply states 'not used' and does not include any restrictions on compulsory purchase. NR are unable to agree to the Applicant's proposed omission for the reasons set out below.</p> <p>The Applicant proposes to compulsorily acquire permanent rights over and temporarily use operational railway land in delivering the DCO scheme over the following plots of land: 05-063; 05-063a; 06-068; 06-069; 06-070; 06-071; 06-072; 06-072a; 06-072b 06-073; 06-073a; 06-073b; 06-074; 06-074a; and 06-077; (together, the <b>Plots</b>)</p> <p>If NR has no ability to require its prior consent to such acquisition and temporary use of this land, it would give rise to a significant, unacceptable risk that the Applicant could compulsorily acquire a right over or temporarily use (as applicable to the respective Plots) railway land which would not be subject to the conditions, limitations and restrictions necessarily required by NR (including any conditions deemed to be required by NR's engineers through its business and technical clearance process) to facilitate and ensure the safe and efficient operation of the railway. The adverse implications of which are that NR may be compromised in its capacity as a statutory undertaker to (a) comply with its Network Licence and (b) (as a consequence of (a)) ensure the safe and efficient running of trains on the railway. NR require their standard Protective Provisions to be on the face of the order.</p> <p>NR operates under a Network Licence granted by the Office of Rail and Road (ORR). Under the Network Licence, NR is obliged to ensure compliance with a wide number of standards imposed by the Rail Safety and Standards Board that pertain to maintaining the safe and efficient running of trains on the railway. In order to regulate its ability to comply with such standards, NR must retain stringent restrictions, controls and procedures over any interferences with the</p>	<p>Heads of Terms for the property agreements have been agreed with Network Rail.</p> <p>The protective provisions for the benefit of Network Rail have been updated in the draft DCO submitted at Deadline 6 and now include Network Rail's required wording.</p> <p>Please refer to the Schedule of Progress regarding Protective Provisions and Statutory Undertakers <b>[EX6/WB8.1.14_C]</b> for further details.</p>



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				<p>railway by third parties, including by reason of persons exercising rights on or over railway land. NR imposes such restrictions through a requirement to obtain its prior consent before rights are compulsorily acquired or railway land is temporarily used and by requiring third parties to enter into an asset protection agreement.</p> <p>Accordingly, where a right is compulsorily acquired and may be exercised over railway land which is not subject to NR's prior consent, such a right is created outside of NR's control and would not be subject to the necessary restrictions and conditions that NR would regard as sufficient so as to enable it to comply with its Network Licence. For example, NR may require that rights granted to the Applicant are subject to reservations allowing NR to interrupt the exercise of such right in certain circumstances (such as enabling NR to deal with emergencies on the railway or carry out necessary works or the exercise of use rights or temporary possession may not be safe to be exercised at a specified period of time due to railway operations). Where NR's prior consent is not required before exercising these powers over railway land, there is a risk that any such rights would not be subject to the required restrictions and as a result NR's control over its ability to appropriately manage the safety of the railway would be compromised. The consequences of NR not being able to effectively manage the safety of the railway could be catastrophic. Moreover, this could lead to a failure by NR to comply with its Network Licence which is not position which can be accepted by NR, nor would it be acceptable to the ORR as NR's regulator.</p> <p>NR is of course willing to engage with the Applicant to agree the terms of the rights sought and is under a duty to act reasonably in doing so. It cannot however relinquish this degree of control over rights being exercised on the railway where the consequences of doing so could be significantly adverse. NR are in discussions with the Applicant to agree the grant of the necessary rights through private agreement, but these negotiations are still in the early stages and so the relevant agreements are not yet in place.</p> <p>A restriction on the compulsory acquisition of rights over railway land is a widely accepted and longstanding principle which has been accepted by the Examining Authority and Secretary of State on numerous DCOs including but not limited to: the A47/A11 Thickthorn Junction DCO, Thurrock Flexible Generation Plant DCO, Yorkshire and Humber CCS Cross Country Pipeline DCO, Sunnica Energy Farm DCO, Longfield Solar Farm DCO and South Humber Bank Energy Centre DCO. The purpose of this restriction is not to impede the implementation of the Applicant's scheme, but to secure the necessary protection to NR as a statutory undertaker in order that it can properly regulate the rights to be exercised over its railway network and which is appropriate function and purpose of protective provisions.</p> <p>It is accepted that there is some protection for the railway in the currently proposed Protective Provisions, as the Applicant must seek NR's prior approval</p>	

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				of any plans, before any specified works commence. However, whilst these requirements secure some comfort for NR in the context of providing some protection for the railway during the carrying out of any works, this protection is limited to NR approving plans and is not sufficient to address the issue of the need for the applicant to enter into an asset protection agreement nor does it allow NR to properly regulate the exercising of any rights by the Applicant.	
CA-03	2.4.13	EDF Energy (Thermal Generation) Ltd <b>[REP5-055]</b>	<b>EDF Energy (Thermal Generation) Ltd</b> The ExA requests a further update on the voluntary property agreement with EDF Energy being sought by the Applicant, noting the comments provided by EDF Energy in response to first written questions [REP3 052], and the update provided by the Applicant at CAH1 [REP4-069], including reference to the importance of such agreements being in place before any limitations on compulsory acquisition powers in protective provisions are agreed to.	EDF continue to engage with the Promoter in respect of voluntary property agreements. Until agreement has been reached, it remains EDF's position that compulsory acquisition of its land would have an adverse impact on and serious detriment to EDF's existing (and future) operations and to ensure that the Station can be safely demolished.	Please refer to the Schedule of Progress regarding Protective Provisions and Statutory Undertakers <b>[EX6/WB8.1.14_C]</b> for further details.
<b>2.5 Draft Development Consent Order (DCO)</b>					
DCO-01	2.5.2	7000 Acres <b>[REP5-051]</b>	<b>Article 2 (Interpretation)</b> With reference to the definition of "Maintain" set out in Article 2 [REP4-24], as noted in first written question 1.5.3 [REP3-038], and discussed in ISH2, is wide ranging in being able to 'alter, remove, refurbish, reconstruct, replace and improve any part' of the authorised development to the extent it would not be possible to 'remove, reconstruct or replace the whole of, the authorised development'. This definition does not rule out the possibility that all, or the large majority, of the development, including the panels, may be replaced during the operation period of the Proposed Development. Noting particularly the anticipated 60 year operational life of the Proposed Development, the Applicant is asked to clarify:	Please see our response to Question 2.9.3.  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 "a total energy generation figure of around 21,956,988 MWh over the estimated 40-year assessed lifetime" is incorrect and misleading. A similar comment can be applied to the batteries used in the BESS, where they will need replacing more frequently than stated.  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.  If the definition of "maintain" in the DCO is not corrected, then a mechanism should be established for the LPA to have oversight and control of the rate of equipment replacement. This will permit the LPA to control the impact on traffic,	Please refer to the Applicant's response to the ExA's Second Written Question 2.9.3 <b>[REP5-039]</b> in relation to replacement rates and response to 2.1.4 and 2.5.2 regarding the definition of "maintain" in the DCO. Please also refer to the Applicant's Response to the ExA Proposed Changes to the dDCO submitted at Deadline 6 <b>[EX6/WB8.1.38]</b> .  The Review of Likely Significant Effects at 60 Years <b>[REP1-060]</b> concludes there is no change to the assessment on likely significant effects for an operational period of up to 60 years.

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			<p>a. Why it is necessary for there to be flexibility within the draft DCO such that most of the panels could be replaced over the operation period, albeit such works would not be all carried out at the same time?</p> <p>b. Based on available evidence, what percentage of panels on existing solar farms are replaced for maintenance during their operation (on an annual basis and overall across their operational period to date)?</p> <p>c. Noting Article 5 (Power to maintain authorised development), does the Applicant foresee the possibility that the large-scale replacement of panels (for example 25%, 50%, 75% or 90% of solar panels within the Order Limits) would be likely to give rise to any materially new or materially different effects that have not been assessed in the environmental statement?</p>	waste, noise, GHG emissions, soil degradation above and beyond the understated impact identified in the ES.	
DCO-02	2.5.3	Lincolnshire County Council (LCC) [REP5-042]	<p><b>Article 11/15 (Temporary prohibition or restriction of use of streets and public rights of way/ Traffic regulation measures)</b></p> <p>With reference to Articles 11/15 [REP4-24], noting the comments made at ISH2 and the ongoing discussion between the Applicant and LCC in relation to the mechanisms for obtaining approval, and update is requested on the discussions seeking to gain agreement which ensures consistency between the DCO and the Outline Construction Management Plan. If agreement has not been reached then the parties are asked to please clearly set out their respective positions. If necessary, LCC is asked to please provide alternative wording.</p>	<p>Article 11 – still needs to include wording “Streetworks Authority approval”. This is about the need for the Developer to follow LCC’s Permitting scheme and not close part of the road network without our approval –the Council needs to be able to coordinate roadworks across the network and ensure that diversion routes work and there is not too much closure in any particular locations at any one time.</p> <p>There is still tension between the proposal to include details in the OCTMP and the fact the DCO doesn’t reflect any need for the Highways Authority to approve these details. The Council would still like to see further amendments in the DCO to capture this.</p>	The outline Construction Traffic Management Plan (oCTMP) provided at Deadline 4 [REP4-039] was amended to included provisions requested by LCC. The Applicant awaits any further comments that LCC may have on the contents of the oCTMP, and notes that DCO Requirement 15 requires the Applicant to comply with the final CTMP (which must be approved by LCC). The Applicant notes that this approach is typical of DCOs, with the DCO granting broad powers which are then controlled in detail by management plans, and does not consider that there is any inconsistency between the DCO and the oCTMP.
DCO-03	2.5.7	West Lindsey District Council (LCC)	<p><b>Schedule 2 (Requirements)</b></p> <p>With reference to Schedule 2, Requirement 2 [REP4-24], the Applicant is asked to explain the rationale for the inclusion of a written</p>	WLDC have suggested the use of phasing as a requirement to assist with the approval process of details submitted pursuant to a particular Requirement.	Please refer to the Applicant's response to question 2.5.7 in <b>WB8.1.34 The Applicant's Response to ExA's Second Written Questions [REP5-039]</b> . This states that the draft of Requirement 2 was updated in the version submitted

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		[REP5-047]	scheme setting out the phase or phases of construction. Noting the comments made previously relating to the need for a phasing requirement, WLDC is asked to comment on the suitability of this provision.	<p>A phasing scheme would allow for details subject to a Requirement to be approved 'in-part' in relation to a defined phase. This would enable transparency and clarity, as well as assisting WLDC in terms of resourcing.</p> <p>WLDC raises no objection to the current drafting of Schedule 2, Requirement 2 as expressed in dDCO Rev. E (Doc Ref: EX4/WB3.1_E).</p>	at Deadline 5 <b>5REP5-096</b> ] to include that the Scheme cannot be commenced until a written scheme setting out the phase or phases of construction of the Scheme has been submitted to the relevant planning authorities.
DCO-04	2.5.10	Lincolnshire County Council (LCC) [REP5-042]	<p><b>Schedule 2 (Requirements)</b></p> <p>With reference to Schedule 2, Requirement 12 (Archaeology) [REP4-24] LCC have provided suggested alternative wording for this requirement [REP4-079].</p> <p>a. LCC are asked to please clarify the rationale for this in terms of how it would address their concerns; and,</p> <p>b. the Applicant is asked to please provide comment on this alternative wording in terms of whether it required for the Proposed Development to comply with relevant policy and guidance.</p>	<p>The Applicant has only undertaken 2% of trenching on 21% of the Site. This leaves almost 80% unevaluated fully. The Applicant relies upon non intrusive measures which are helpful but are not definitive and require checking by trial trenching. This is an approach that is well established and it is noted that both LCC and NCC consider that 3-5% of the entire site should be subject to checking by trial trenching.</p> <p>Geophysical surveying will identify some assets but not all below ground archaeology will be reflected in the survey reports. LCC has numerous examples of where a non-intrusive survey has failed to identify significant archaeological sites. At present, the Applicant cannot accurately determine the presence or absence of archaeological remains within 80% of the application site. Without understanding the likely presence or absence of archaeology across the majority of the site, it is entirely premature to approve a WSI which deals with mitigation. Sensibly, one can only decide how to appropriately mitigate something when that something has been adequately described and identified. Without surveying and without adequate mitigation there is a risk of real harm caused to assets below the ground.</p> <p>The proposed revision to requirement 12 provides for a 'Plan B' whereby LCC's primary concerns that survey work should be undertaken prior to consent would not be addressed but instead provides for a 'Plan B' approach for additional surveying to be undertaken post consent. This does not fully remove LCC's concerns but provides at least that survey works would be undertaken before development takes place."</p>	<p>The Applicant refers LCC and the ExA to the update that was provided by the Applicant at Issue Specific Hearing 4 on 8 February, Issue Specific Hearing 5 on the 13<sup>th</sup> March and Statement of Common Ground, LIR Ref LCC 12.15-LCC 12.16 in the <b>8.1.20 Applicant's Response to Local Impact Reports [REP3-037]</b>. Please see the <b>Written Summary of the Applicant's Oral Submissions at the Issue Specific Hearing (ISH4) [REP4-071], Oral Submissions at the Issue Specific Hearing (ISH5) [REP5-037]</b>, the draft <b>Lincolnshire County Council Statement of Common Ground Revision A [EX6/WB8.3.1_A]</b>, and the <b>Statement of Commonality [REP5-025]</b>.</p> <p>As evidenced in the Applicant's Response to 2.7.1 of the EXA Second Written Question the Applicant's approach to archaeological management and mitigation complies with relevant legislation, policy and guidance (see Appendix 1 and 2) <b>[REP5-039]</b>. The Applicant considers that they have taken a reasonable, proportionate and consistent approach to the archaeological evaluation guided by national and local guidance that has enabled the collection of high-quality reliable data. This has provided an adequate understanding of the archaeological potential and developmental impacts as set out in <b>6.2.13 Environmental Statement Chapter 13 Cultural Heritage [APP-051]</b> and has been used to formulate an appropriate mitigation strategy as set out in <b>6.3.13.7 Environmental Statement Appendix 13.7 Archaeological Mitigation WSI [REP5-016]</b>.</p> <p>The Applicant respectfully disagrees with LCC and considers that sufficient evaluation, proportionate to the stage at which the Scheme is at, has been undertaken to inform the DCO Application and any mitigation works required as part of the written scheme of investigation (<b>6.3.13.7 Environmental Statement - Appendix 13.7 Archaeological Mitigation WSI (Written Scheme of Investigation) [REP5-016]</b>) as secured by Requirement 12</p>

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					<p>of Schedule 2 in <b>3.1_G Draft Development Consent Order Revision G [EX6/WB3.1_G]</b>.</p> <p>The Applicant considers that the sample of evaluation trenching requested by LCC 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). 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 North / 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> <p>The Applicant also highlights the inconsistent approach required by LCC, whereby in their response to Question 2.5.10 of the ExA Second Written Questions <b>[REP5-039]</b> LCC state they require 3-5% trenching. This is in contrast to correspondence to date between the Applicant and LCC, who have previously requested a 2% sample (please see Table 2.1 of draft <b>Statement of Common Ground [REP1-061]</b>) and Option C of Deadline 5 Submission - Any further information requested by ExA <b>[REP5-041]</b> which states LCC request "2% trenching with a 2% contingency across the remaining 79% of the Order Limits", as well as other Solar Schemes in Lincolnshire. For example, the evaluation trial trenching for the Gate Burton Energy Park, which LCC considered sufficient evaluation to have been completed, is estimated by the applicant to total 1.09% (please see <b>WB8.2.6 Comparison of Archaeological Evaluation Investigations on Solar Schemes [REP4-001]</b>).</p> <p>In the event that the Secretary of State is minded to agree with LCC and NCC that there is a requirement for further trenching to inform the mitigation measures or detailed design of the Scheme, the Applicant believes that such trenching can be undertaken post-determination of the</p>

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					DCO application, and in advance of the construction of the Scheme. A without prejudice archaeological WSI [REP5-033] has therefore been prepared that includes a programme of further 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.
DCO-05	2.5.11	Environment Agency [REP5-056]	<p><b>Schedule 2 (Requirements)</b></p> <p>Noting the insertion of the Requirement 22 into dDCO Revision E [REP4-024] relating to Long Term Flood Risk mitigation, and the comments made in the Statement of Commonality [REP4-061], the parties are asked to provide further justification for this Requirement, noting that on this basis information regarding long term flood risk effects would be provided after the Secretary of State has made their decision.</p>	<p>The Flood Risk Assessment was initially reviewed on the basis that the development would have an expected lifetime of 40 years.</p> <p>“The Review of Likely Significant Effects at 60 Years” document was then submitted at a later date, which indicated the development would have a lifetime of at least 60 years. Due to this, the climate change allowance for the 2080s epoch should be used. According to the Planning Practice Guidance, a climate change allowance of 39% should be used for essential infrastructure. Therefore, mitigation measures should be applied in accordance with a 1 in 100 year + 39% climate change design flood event to ensure the development is resilient for its entire lifetime and does not increase flood risk elsewhere up to and during the design flood.</p> <p>We hold hydraulic modelling for the Tidal Trent for this flood event. We advised the applicant to request this data to update their Flood Risk Assessment and apply the necessary mitigation measures/floodplain compensation in accordance with the updated climate change allowance for the extended lifetime.</p> <p>Since we did not receive sufficient prior notification that the development lifetime was to be extended, there was insufficient time for us to respond to the data request and the applicant update the FRA in time for the submission deadline, hence this information being submitted at a later date. Ideally, this information should be submitted and reviewed prior to the Secretary of State decision making process. However, we are aware that the DCO timescales would not allow for this, and that the submitted information will be provided prior to construction at the detailed design stage.</p>	<p>Please refer to the Applicant's response to question 2.5.11 in <b>WB8.1.34 The Applicant's Response to ExA's Second Written Questions [REP5-039]</b>.</p> <p>The Applicant would reiterate that Requirement 22 in Schedule 2 to the draft DCO [EX6/WB3.1_G] requires the Applicant to submit the updated flood risk assessment to the Environment Agency prior to commencement of the authorised development and has been agreed with the Environment Agency as set out in the <b>Statement of Common Ground [EX6/WB8.3.5_B]</b>.</p>
DCO-06	2.5.13	National Grid Electricity Transmission plc (NGET) [REP5-061]	<p><b>Schedule 16 – Protective Provisions, Part 3</b></p> <p>With reference to Schedule 16, Part 3 [REP4-24], the Applicant's Deadline 4 Update on Schedule of Progress regarding Protective Provisions (PP) and Statutory Undertakers [REP4-063] noted that, whilst PP have been</p>	<p>Further to NGET's relevant representations which were received by the Examining Authority on 8 June 2023, NGET continues to seek to liaise with the Applicant in relation to the Protective Provisions that it requires to be included within the DCO to ensure that its interests are adequately protected.</p> <p>NGET has sought to engage with the Applicant in order to provide a response to the Examining Authority's Second Written Question 2.5.13. In the absence of any</p>	<p>Please refer to the Schedule of Progress regarding Protective Provisions and Statutory Undertakers submitted at Deadline 6 [EX6/WB8.1.14_C].</p>

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			<p>included in the draft DCO, discussions are ongoing.</p> <p>The Applicant and NGET are requested to submit a single, jointly prepared set of PP, identifying any areas where agreement cannot be reached and providing details of each party's position on areas of disagreement, together with any alternative wording proposed.</p>	<p>substantive response from the Applicant to NGET's requests to agree a combined response to Written Question 2.5.13 a red line version of the Protective Provisions comparing the Protective Provisions as currently contained within the draft DCO with NGET's required Protective Provisions is attached to these written representations with changes explained in the table below:</p> <p>Reference to National Grid Electricity Plc instead of to National Grid. NGET requires that it is referred to as National Grid Electricity Transmission Plc instead of just National Grid throughout the Protective Provisions as this removes any uncertainty as to the entity being referenced.</p> <p>Interpretation, definition of "1991 Act" NGET considers that this definition should be retained due to its use in paragraph 3 (On Street Apparatus) and paragraph 9 (Retained Apparatus) of the Protective Provisions.</p> <p>Interpretation, definition of "acceptable credit provider", "acceptable insurance" and "acceptable security". NGET considers that these definitions should be retained due to their use in paragraph 11 (Indemnity) of the Protective Provisions.</p> <p>Interpretation, definition of "commence" and "commencement" NGET considers that the original drafting proposed by the Applicant was very limited in in the extent of works that would be classified as commencement. In order to comply with relevant safety standards, and ensure the efficient operation of the network, NGET considers that a much broader scope of works falling within 'commencement' to include any below ground surveys and monitoring, ground work operations or the receipt and erection of construction plant and equipment is required and has provided appropriate drafting in relation to this. This drafting will ensure that any works undertaken in proximity to NGET apparatus will fall within the scope of the Protective Provisions and the protections contained therein will be engaged.</p> <p>Interpretation, definition of "parent company" NGET considers that this definition is required due to this terms inclusion in the definition of "acceptable security".</p> <p>Paragraph 4-(1) NGET considers that the inclusion of paragraph 4(1) is required due to Article 9 of the draft DCO which relates to the power to alter the layout etc. of streets. In order to ensure that there is no impediment upon NGET's ability to access its assets and apparatus to allow efficient operation, maintenance, and safety procedures to continue paragraph 4(1) is required.</p> <p>Paragraph 6-(2) NGET considers that additional wording at the end of paragraph 6(2) is required to ensure that it is clear that NGET is not responsible for procuring and/or</p>	

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				<p>securing the consent of third parties with an interest in the land, and entering into any such deeds and variations with them. The requirement to procure and secure the consent of third parties and enter such deed or variations with them has the potential to require a significant level of time and resources and it is not in the interests of the efficient running of the electricity network to require NGET to use its limited resources to undertake this work.</p> <p>Paragraph 9-(5)(b) Works in proximity to and affecting NGET assets and apparatus require significant assessment and the involvement of multiple stakeholders from both inside and outside NGET, including complex engineering assessment. Undertaking such assessment can take longer than 28 days and it is important that such assessment is undertaken fully instead of being rushed to comply with any arbitrary timescale in order to ensure that the safety of operations in proximity to high voltage apparatus is not compromised, nor is the operational security of the electricity transmission network. In the interests of safety and ensuring that there is no disruption to the electricity network caused by such works, NGET does not consider that including a time limit of 28 days for 'meaningful engagement' in relation to the approval of a plan of works is appropriate. The Applicant does not provide any clarification as to what constitutes 'meaningful engagement' and the lack of certainty about what is required, alongside the significant work required to assess any plans submitted means that NGET requires the proposed wording to be removed.</p> <p>Paragraph 9-(9) An assessment of whether the works proposed by the undertaker will require the removal of any apparatus requires significant consideration and the involvement of multiple stakeholders from both inside and outside NGET including complex engineering and/or feasibility assessment. If apparatus needs to be moved, failure to move such apparatus will have a significant impact upon the proper operation of the electricity transmission network and carries significant safety implications for the works carried out in proximity to such apparatus. NGET does not consider that including a time limit of 28 days to provide written notice that any apparatus needs to be moved is appropriate due to the level of assessment required to identify whether apparatus needs to be moved and the significant impacts should such apparatus not be properly identified.</p> <p>Paragraph 11-(7) NGET considers that a requirement upon the undertaker to provide acceptable security for the construction period, as well as a requirement to hold acceptable insurance for the construction period is essential to ensure that its interests are protected. NGET is responsible for ensuring the efficient operation of the electricity transmission network, as well as ensuring that the network operates</p>	



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				<p>safely and has associated statutory duties with which it must comply. In the event that any impediment is caused to NGET apparatus or assets during the construction period, this can have significant consequences for the operation of the network as well as safety due to the high voltage of the electricity transmission network. The provision of acceptable security and insurance is a standard requirement of NGET (for example see paragraph 25(7) of Schedule 10 to The Hynet Carbon Dioxide Pipeline Order 2024) to ensure that any risk associated with works taking place in proximity to its assets and apparatus is mitigated. NGET considers that in the event the undertaker does not provide acceptable security and insurance then the significant risk to the operation of the electricity transmission network is such that there should be no ambiguity as to its ability to seek injunctive relief in respect of the works. Therefore, the inclusion of paragraph 11(8) is also essential to avoid any ambiguity.</p> <p>Paragraph 15 NGET considers that the provisions in paragraphs 7(2) (removal of apparatus – consent for alternative apparatus), 7(4) (removal of apparatus – alternative apparatus to be constructed in agreed manner), and 9 (retained apparatus: protection of National Grid Electricity Plc as electricity undertaker) of the Protective Provisions are of such importance to ensure the efficient operation and safety of the electricity transmission network that the full scope of dispute resolution options should be available in the event of a dispute. Should NGET apparatus need to be moved, it is important that all necessary steps are taken to put all required consents in place, and ensure that replacement apparatus is built correctly. In such situations, NGET need to be able to act quickly to correct any defects in consenting and construction to ensure that the replacement assets are safe and ready to replace removed assets promptly and without any interruption of service. Should NGET apparatus be retained, NGET need to be able to act quickly and in whatever way it deems necessary to protect such apparatus and ensure it remains safe and fully operational. NGET recognises the importance of arbitration however it is of the view that in the event of a dispute related to paragraphs 7(2), 7(4) or 9, arbitration may not offer the urgent resolution that would be required. Paragraph 8(1) (facilities and rights for alternative apparatus) is covered by the dispute resolution procedure in paragraph 8(2) and so it does not need to fall within the scope of paragraph 15.</p> <p>NGET remains willing to assist the Examining Authority including in trying to submit a single, jointly prepared set of PP, identifying any areas where agreement cannot be reached and providing details of each party's position on areas of disagreement, together with any alternative wording proposed.</p> <p>See red line recommended changes to dDCO at <a href="https://www.planninginspectorate.gov.uk/EN010132-001735-National%20Grid%20Electricity%20Transmission%20Plc%20-%20Response%20to%20ExA%20Second%20Written%20Question.pdf">EN010132-001735-National Grid Electricity Transmission Plc - Response to ExA Second Written Question.pdf</a> (<a href="https://www.planninginspectorate.gov.uk">planninginspectorate.gov.uk</a>)</p>	

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DCO-07	2.5.17	Environment Agency <b>[REP5-056]</b>	<p><b>Schedule 19 – Protective Provisions, Part 9</b></p> <p>With reference to Schedule 16, Part 9 [REP4-24], the Applicant's Deadline 4 Update on Schedule of Progress regarding Protective Provisions (PP) and Statutory Undertakers [REP4-063] noted that, whilst PP have been included in the draft DCO, discussions are ongoing.</p> <p>The Applicant and the EA are requested to submit a single, jointly prepared set of PP, identifying any areas where agreement cannot be reached and providing details of each party's position on areas of disagreement, together with any alternative wording proposed.</p>	<p>In terms of the Protective Provisions, they are currently as we have agreed for the Cottam Solar Farm except for one change. Under the definition of "specified works" we note the applicant has moved works which are likely to "affect any drainage work or volumetric rate of flow of water in or flowing to or from any drainage work" from applying to any distance from a drainage work to now only applying where the works are within 8 metres of the base of a remote defence. The amendment we are seeking means the relevant part of the DCO should read:</p> <p>"specified work" means so much of any work or operation authorised by this Order as is in, on, under, over or within—</p> <p>(a) 8 metres of the base of a remote defence which is likely to—</p> <p>(i) endanger the stability of, cause damage or reduce the effectiveness of that remote defence; or</p> <p>(ii) interfere with the Agency's access to or along that remote defence;</p> <p>(b) 16 metres of a drainage work involving a tidal main river or 8 metres of a drainage work involving a non-tidal main river; or</p> <p>(c) any distance of a drainage work and is otherwise likely to—</p> <p>(i) affect any drainage work or the volumetric rate of flow of water in or flowing to or from any drainage work;</p> <p>(ii) affect the flow, purity or quality of water in any main river or other surface waters;</p> <p>(iii) cause obstruction to the free passage of fish or damage to any fishery;</p> <p>(iv) affect the conservation, distribution or use of water resources; or</p> <p>(v) affect the conservation value of the main river and habitats in its immediate vicinity; or which involves—</p> <p>(d) an activity that includes dredging, raising or taking of any sand, silt, ballast, clay, gravel or other materials from or off the bed or banks of a drainage work (or causing such materials to be dredged, raised or taken), including hydrodynamic dredging or desilting; and</p> <p>(e) any quarrying or excavation within 16 metres of a drainage work which is likely to cause damage to or endanger the stability of the banks or structure of that drainage work.</p> <p>The applicant has agreed to this and advises they make this change in the version of the draft DCO which they aim to submit at Deadline 5. Providing this is done, we will be happy that the Protective Provisions are agreed.</p>	<p>The protective provisions included in Part 9 of Schedule 19 was updated at Deadline 5 to take into account comments by the EA. This version of the protective provisions is in an agreed form as set out in the final and signed <b>WB8.3.5_B Statement of Common Ground with Environment Agency Revision B [EN010132/EX6/WB8.3.5_B]</b> and is included in the latest draft DCO <b>[EX6/WB3.1_G]</b>.</p>
DCO-08	2.5.18	Network Rail Infrastructure Limited <b>[REP5-063]</b>	<p><b>Schedule 16 – Protective Provisions, Part 10</b></p> <p>With reference to Schedule 16, Part 10 [REP4-24], the Applicant's Deadline 4 Update on Schedule of Progress regarding Protective Provisions (PP) and Statutory Undertakers</p>	<p>The Protective Provisions that are required by NR to be included in the draft Order have been sent to the Applicant's solicitors, but NR have not received a response on the Protective Provisions of at the time of writing, in respect of this scheme.</p> <p>It is noted in the Written Summary of the Applicant's Oral Submissions &amp; Responses at the Compulsory Acquisition Hearing 1 that NR's preferred</p>	<p>Please refer to the Schedule of Progress regarding Protective Provisions and Statutory Undertakers submitted at Deadline 6 <b>[EX6/WB8.1.14_C]</b>.</p>

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			<p>[REP4-063] noted that, whilst draft PP have been included in the draft DCO, discussions are ongoing.</p> <p>Noting the comments made by Network Rail in response to first written question 1.4.6 [REP3-051], the Applicant and Network Rail are requested to submit a single, jointly prepared set of PP, identifying any areas where agreement cannot be reached and providing details of each party's position on areas of disagreement, together with any alternative wording proposed.</p>	<p>protective provisions are included in the most recent version of the DCO, however this is incorrect and the most recent version of the DCO does not provide for sufficient protection of the railway.</p> <p>As discussed above, we hereby enclose with this letter the standard Protective Provisions for the protection of railway interests which NR requests to be included in the draft Order.</p>	
DCO-09	2.5.21	Roy Clegg [REP5-083]	<p><b>Schedule 16 – Protective Provisions, Part 17</b></p> <p>With reference to Schedule 16, Part 17 [REP4-24], the Applicant's Deadline 4 Update on Schedule of Progress regarding Protective Provisions (PP) and Statutory Undertakers [REP4-063] noted that, whilst draft PP have been included in the draft DCO, discussions are ongoing.</p> <p>The Applicant and Tillbridge Solar are requested to submit a single, jointly prepared set of PP, identifying any areas where agreement cannot be reached and providing details of each party's position on areas of disagreement, together with any alternative wording proposed.</p>	<p>The Applicant and especially the ExA are inviting, and responding to questions about a project, namely Tillbridge Solar Project and this falls outside of the remit identified in other NSIP's that each Project is to be addressed independently. This is further difficult to accept when the Tillbridge project is not yet been assigned an ExA! Accordingly, will the ExA withdraw this, and any other similar issues so raised?</p>	<p>The Applicant notes this comment. A DCO application for the Tillbridge Project [EN010142] was submitted to PINS on 10 April 2024. PINS will issue a decision on whether to accept the application on 8 May 2024.</p> <p>As the Order limits for the Scheme overlap with the Order limits for the Tillbridge Project the Applicant considers it appropriate to include protective provisions as it has done for Cottam Solar Project and the Gate Burton Energy Park.</p>
DCO-10	2.5.22	EDF Energy (Thermal Generation) Ltd [REP5-055]	<p><b>Schedule 16 – Protective Provisions, Part 18</b></p> <p>With reference to Schedule 16, Part 18 [REP4-24], the Applicant's Deadline 4 Update on Schedule of Progress regarding Protective Provisions (PP) and Statutory Undertakers [REP4-063] noted that, whilst draft PP have been included in the draft DCO, discussions are ongoing.</p> <p>Noting the comments made by EDF Energy on response to first written question 1.4.7 [REP3-052], the Applicant and EDF Energy are</p>	<p>The Promoter and EDF are largely in agreement on the form of protective provisions that should be included in the DCO for the protection of EDF's undertaking, and Part 18 of Schedule 16 to the draft DCO submitted at Deadline 5 has been updated by the Promoter to reflect this.</p> <p>The only area of disagreement relates to paragraph 238 (acquisition of land), and the parties' preferred wording is as follows:</p> <p><b>EDF's preferred wording:</b></p> <p>238.—(1) Regardless of any provision in this Order or anything shown on the land plans or contained in the book of reference to the Order, the undertaker may not (a) appropriate or acquire or take temporary possession of or entry to any land or apparatus or (b) appropriate, acquire, extinguish, interfere with or override any easement, other interest or right or apparatus of EDF otherwise</p>	<p>Please refer to the Schedule of Progress regarding Protective Provisions and Statutory Undertakers submitted at Deadline 6 [EX6/WB8.1.14_C].</p>

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			<p>requested to submit a single, jointly prepared set of PP, identifying any areas where agreement cannot be reached and providing details of each party's position on areas of disagreement, together with any alternative wording proposed.</p>	<p>than by agreement.</p> <p>(2) As a condition of an agreement between the parties in sub-paragraph (1), prior to the carrying out of any part of the authorised development (or in such other timeframe as may be agreed between EDF and the undertaker) that is subject to the requirements of this Part of this Schedule that will cause any conflict with or breach the terms of any easement or other legal or land interest of EDF or affect the provisions of any enactment or agreement regulating the relations between EDF and the undertaker in respect of any apparatus laid or erected in land belonging to or secured by the undertaker, the undertaker must as EDF reasonably requires enter into such deeds of consent upon such terms and conditions as may be agreed between EDF and the undertaker acting reasonably and which must be no less favourable on the whole to EDF unless otherwise agreed by EDF, and the undertaker will use reasonable endeavours to procure or secure (or both) the consent and entering into of such deeds and variations by all other third parties with an interest in the land at that time who are affected by such authorised development.</p> <p>(3) Save where otherwise agreed in writing between EDF and the undertaker, the undertaker and EDF agree that where there is any inconsistency or duplication between the provisions set out in this Part of this Schedule relating to the relocation or removal of apparatus (including but not limited to the payment of costs and expenses relating to such relocation and/or removal of apparatus) and the provisions of any existing easement, rights, agreements and licences granted, used, enjoyed or exercised by EDF or other enactments relied upon by EDF as of right or other use in relation to the apparatus, then the provisions in this Part of this Schedule will prevail.</p> <p>(4) As a condition of an agreement between the parties in sub-paragraph (1) which relates to taking temporary access rights during construction over EDF's land, EDF may ensure that it retains flexibility to alter any construction routes (within the Order limits) or to limit access for certain time periods, and may require the undertaker to pay any reasonable security and maintenance costs involved in the grant of any such rights.</p> <p>(5) Any agreement or consent granted by EDF under paragraph 9 or any other paragraph of this Part of this Schedule, are not be taken to constitute agreement under sub-paragraph (1).</p> <p>While the Promoter has agreed with EDF's preferred form of wording for paragraph 238, it does not agree with its inclusion before voluntary agreements have been concluded. It remains EDF's position that this wording must be included regardless of if or when voluntary agreements are finalised to ensure there is no serious detriment to EDF's undertaking.</p>	

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<b>2.6 Health and Wellbeing</b>					
HW-01	2.6.1	West Lindsey District Council (LCC) [REP5-047]	<b>Involvement of Health Authorities</b> Given the number of schemes in the vicinity of WBSP, and the population living within these schemes, mostly rural, some urban, the cumulative impact is such that a number of Interested Parties assert that a Health Impact Assessment should be carried out with involvement of the local health bodies. IPs are invited to provide any justification for this, and summarise what further evidence this may reveal. The Applicant and all IPs are invited to make further comments.	<p>WLDC have previously raised comments with regard to the value in carrying out a Health Impact Assessment outside that of an EIA methodology. Following the basic structure and sources of information contained within the "Central Lincolnshire Local Plan Health Impact Assessment for Planning Application: Guidance Note (Updated April 2023)", a non-EIA HIA would enable an assessment to be carried-out that seeks to identify all potential opportunities for achieving positive mental and physical health outcomes through the delivery and operation of the proposed scheme.</p> <p>Such a document would not necessarily be restricted by a methodology to solely identify significant impacts but would allow for all such opportunities to be identified alongside other cumulative projects.</p> <p>WLDC maintain a view that the Applicant's assessment adequately considers the construction and long term impacts of the cumulative schemes on local residents health and wellbeing who use these roads for recreational purposes. The chapter does not take into account the local amenity impact of the cumulative construction traffic associated with the proposed solar schemes. Whilst it is acknowledged an assessment of access to local health services and work has been undertaken, this does take into account the impact on the mental health that traffic could have on the community.</p>	<p>Please refer to the Applicant's response to question 2.6.1 in <b>WB8.1.34 The Applicant's Response to ExA's Second Written Questions [REP5-039]</b></p> <p>The assessment of cumulative traffic impacts undertaken in Section 14.9 of <b>6.2.14 Environmental Statement - Chapter 14 Transport and Access [APP-052]</b> identify no significant effects during any phase of the Scheme's lifetime. As such, it was not considered that there were any pathways to additional or cumulative health and wellbeing impacts as a result. On that basis it was not considered necessary to separately assess direct mental health impacts from increased traffic on local routes in <b>6.2.21 Environmental Statement - Chapter 21_Other Environmental Matters [APP-059]</b> or <b>WB8.4.21.1 Environmental Statement - ES Addendum 21.1: Human Health and Wellbeing Effects [REP4-077]</b>.</p>
HW-02	2.6.2	West Lindsey District Council (LCC) [REP5-047]	<b>WLDC Policy</b> WLDC refers to its adopted Health SPD in various answers to first written questions [REP3-044]. Please can WLDC provide a copy of, or a hyperlink to the SPD, and identify relevant parts. The Applicant is invited to provide specific comments.	<p>A copy of the SPD is submitted with this response.</p> <p>[See submission document <a href="https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010132/EN010132-001776-West%20Lindsey%20District%20Council%20-%20Responses%20to%20the%20ExAs%20Second%20Written%20Questions%201.pdf">infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010132/EN010132-001776-West Lindsey District Council - Responses to the ExAs Second Written Questions 1.pdf</a>]</p> <p>I link to the document is also included below: <a href="https://www.nhs.uk/consult/healthimp/health_impact_assessment_for_planning_applications_guidance_note.pdf">Health impact assessment for planning applications guidance note.pdf (n-kesteven.gov.uk)</a></p>	<p>Please refer to the Applicant's response to question 2.6.2 in <b>WB8.1.34 The Applicant's Response to ExA's Second Written Questions [REP5-039]</b>.</p>
HW-03	2.6.3	7000 Acres [REP5-051]	<b>Health Assessment</b> 7000 Acres is concerned that the various Health reports have not been prepared by "an expert in health". Please can 7000 Acres provide a reference to a requirement for such evidence to be prepared by a health expert, and identify specifically what it considers to be lacking from the various reports.	<p>The author of the 7000Acres response to questions 2.6.3 and 2.6.5 is a health professional who has over thirty years' experience of working in Lincolnshire Health as a General Practitioner and in a leadership position within the local Lincolnshire NHS.</p> <p>Please see the document Institute of Environmental Management and Assessment (IEMA): Guide to Effective Scoping of Human Health in Environmental Impact Assessment. IEMA guidelines were referenced by the Applicant during the Issue Specific Hearing 4 (ISH4) and in the Addendum on Health and Wellbeing for West Burton as industry standards to setting out the Health and Wellbeing section in the Environmental Impact Assessment.</p> <p>We quote under Section 2.5 of this document (Aims, Audience and Terminology), which clearly states that "the audience of this guide are Environmental Impact</p>	<p>Please refer to the Applicant's response to:</p> <ul style="list-style-type: none"> <li>• Question 2.6.4 in <b>WB8.1.34 The Applicant's Response to ExA's Second Written Questions [REP5-039]</b>;</li> <li>• Section 2.9 of <b>WB8.1.18 Response to Written Representations at Deadline 1 Part 2 [REP3-035]</b>, in response to previous representation <b>[REP1A-015]</b>; and</li> <li>• 7A-02 to 7A-30 below in this document in response to 7000 Acres' comments on the ES Health Addendum <b>[REP5-049]</b>.</li> </ul>

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				<p><i>Assessment health practitioners" who are "responsible for drafting and conducting scoping reports in England, Wales, Scotland Northern Ireland, and the Republic of Ireland".</i></p> <p>7000 Acres believes that Human Health and Wellbeing should have been commissioned by LANPRO externally to prevent bias and allow for an independent assessment produced by experts in health who understand what is required especially around population health.</p> <p>From the document Institute of Environment Environmental Management and Assessment (IEMA): Determining significance for Human Health in Environment Impact Assessment, the guidance suggested that Human Health significance in the Environmental Impact Assessment should include an "expert" judgement supported by evidence, which is sadly lacking in the Human Health section within the West Burton EIA document, and that this relies on professional judgement of what is important, desirable or acceptable.</p> <p>We gather a Town Planner completed the section on Health and Wellbeing within the LANPRO Environmental Impact Assessment documents within the Chapter Socioeconomics. This should have been completed by an Environment Health Practitioner. May we point out the whole purpose of an Environmental Impact Assessment is to assess firstly the effects of this scheme on the environment, and secondly to ensure that the population's health is not affected as result of the scheme itself. Therefore, Human Health and Wellbeing requires a separate chapter within the Environmental Impact Assessment and not as it was presented in the LANPRO documents.</p> <p>In addition, the Guidance to the Environmental Impact Assessment Regulations 2017 <a href="https://www.gov.uk/guidance/environmental-impact-assessment#Preparing-an-Environmental-Statement1">https://www.gov.uk/guidance/environmental-impact-assessment#Preparing-an-Environmental-Statement1</a> states:</p> <p><i>"Preparing an Environmental Statement Where it is decided that an assessment is required, the applicant must prepare and submit an Environmental Statement. The Environmental Statement must include at least the information reasonably required to assess the likely significant environmental effects of the development listed in regulation 18(3) and comply with regulation 18(4).</i></p> <p><i>To help the applicant, public authorities must make available any relevant environmental information in their possession.</i></p> <p><i>To ensure the completeness and quality of the Environmental Statement, the developer must ensure that it is prepared by <b>competent experts</b> [7000Acres emphasis]. The Environmental Statement must be accompanied by a statement from the developer outlining the relevant expertise or qualifications of such experts."</i></p> <p>The Applicant has instructed specialists in soil analysis, archaeology, glint and glare, BESS safety and others, why not a health specialist?</p>	

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				The ES assesses some health aspects in a piecemeal manner but does not consider all the aspects required, or take a cumulative account of all the issues. Please see our REP1A 015 for a comprehensive answer on the issues we consider are missing from the Applicant's assessment. In addition, we are making written responses at Deadline 5 regarding The Applicant's Addendum 21.1: Human Health and Wellbeing effects.	
HW-04	2.6.5	West Lindsey District Council (LCC) <b>[REP5-047]</b>	<p><b>Health Impact Assessment</b></p> <p>Paragraph 4.3.18 of Environmental Statement Addendum 21.1: Human Health and Wellbeing Effects February 2024 [REP4-077] explains that the Applicant's view is that Policy S54 requirement for a HIA is for TCPA planning applications, and the HIA scoping process is therefore determined by the local planning authority, whereas HIA scoping for NSIPs is determined by the Planning Inspectorate. A separate HIA had not been scoped in, and therefore was not required to be undertaken for this Scheme.</p> <p>Elsewhere, other 'local' policy requirements in adopted plans where a local planning authority determines TCPA planning applications are readily addressed, with compliance being demonstrated. Examples include the OLEMP para 4.8.4 reference to the Lincolnshire BAP priority, and references to the Central Lincolnshire Local Plan (2017) and Draft Bassetlaw District Local Plan (2021) at Paragraph 14.3.2 of Chapter 14: Transport and Access. In the latter's case, it states that "The proposals have also been considered in the context of the following documents".</p> <p>Please can the Applicant (and other Ips, optionally) comment further on why various local policies provide relatively greater context for consideration of the proposals.</p>	<p>The Central Lincolnshire Local Plan Health Impact Assessment for Planning Application: Guidance Note ('HIA Guidance Note') (Updated April 2023) form part of the development plan relevant to development proposals within the West Lindsey District.</p> <p>The adopted statutory development is an important and relevant consideration in the determination of the application under section 105 of the PA2008.</p> <p>Regard to the HIA Guidance Note should be had as with all other policies within the adopted statutory development plan. The weight given to the document is rightly to be determined by the decision maker.</p> <p>The Applicant appears to have misunderstood the context of the HIA Guidance note. It is not a document that provides policy guidance solely for EIA development. Reference to 'scoping' within it relates to the scope of a HIA, which can be EIA, non-EIA or both depending on the nature of development, matters being considered and the outcomes being sought.</p> <p>The fact that PINS are the 'competent authority' for the purpose of EIA development to be determined under the PA2008, avoids the point raised by WLDC in that this document appears to have ignored (both in EIA terms and as assessment that sits outside of EIA as an application document).</p> <p>In terms of establishing relevance and context, the question is whether health impacts are important and, if so, all important and relevant policies must be considered. Health impacts are clearly important in the context of the scheme and, whilst the applicant has carried out an assessment of likely significant environmental effects, the HIA Guidance Note has not been reference at all in either the ES or the Planning Statement.</p> <p>The Environmental Statement Addendum 21.1: Human Health and Wellbeing Effects (February 2024) states that the Applicant's assessment of the scheme's compliance with Policy S54 has been assessed in the Planning Statement (Revision B). Turning to the Planning Statement however reveals that no such assessment has been carried, and no reference to the HIA Guidance Note has been made. There is a cursory response to Policy S54 in the Planning Statement Appendix D (page 23), which simply refers back to ES Addendum 21.1 for an assessment. It is therefore apparent that an assessment of the impacts against relevant policy has not been undertaken by the applicant.</p>	Please refer to the Applicant's response to question 2.6.5 (and 2.6.3) in <b>WB8.1.34 The Applicant's Response to ExA's Second Written Questions [REP5-039]</b> .

Ref	ExA FWQ's	Respondent	Question	Response	Applicant's Comment
HW-05	2.6.5	7000 Acres <b>[REP5-051]</b>	<p><b>Health Impact Assessment</b></p> <p>Paragraph 4.3.18 of Environmental Statement Addendum 21.1: Human Health and Wellbeing Effects February 2024 [REP4-077] explains that the Applicant's view is that Policy S54 requirement for a HIA is for TCPA planning applications, and the HIA scoping process is therefore determined by the local planning authority, whereas HIA scoping for NSIPs is determined by the Planning Inspectorate. A separate HIA had not been scoped in, and therefore was not required to be undertaken for this Scheme.</p> <p>Elsewhere, other 'local' policy requirements in adopted plans where a local planning authority determines TCPA planning applications are readily addressed, with compliance being demonstrated. Examples include the OLEMP para 4.8.4 reference to the Lincolnshire BAP priority, and references to the Central Lincolnshire Local Plan (2017) and Draft Bassetlaw District Local Plan (2021) at Paragraph 14.3.2 of Chapter 14: Transport and Access. In the latter's case, it states that "The proposals have also been considered in the context of the following documents".</p> <p>Please can the Applicant (and other Ips, optionally) comment further on why various local policies provide relatively greater context for consideration of the proposals.</p>	<p>The applicant states that the scope and assessment methodology for each of the ES chapters relevant to human health was agreed in March 2022. This included input and consideration of comments and requirements from local planning authorities and statutory bodies responsible for human health.</p> <ol style="list-style-type: none"> <li>1. Good Governance dictates transparency. Please explain which statutory bodies were consulted.</li> <li>2. Was the scoping discussion with national, regional or local Public Health?</li> </ol> <p>We ask this with reference to the Applicant's comment that "<i>no additional consultation was undertaken as it was considered that the comments received were sufficient to be able to undertake the human health assessment in accordance with the scoping opinion</i>". 7000 Acres believes that further consultation beyond this was required and that this is demonstrated by the lack of breadth on human health and wellbeing assessment in the ES document provided by LANPRO.</p> <p>Were the relevant bodies aware at the time of the huge scale development planned so that they could advise at the time the potential cumulative effects? We now have 13,000 acres surrounding a population of over 40,000 people, and this presents concerns to human health and wellbeing and justifies a Health Impact Assessment because of scale. Presenting these schemes under National Infrastructure Planning Projects somehow bypasses local planning authorities, in this case Lincolnshire who have under the Central Lincolnshire Local Plan a Health Impact Assessment Guidance for planning applications. They have followed the National Planning Practice Guidance.</p> <p>From the industry guidance document Institute of Environment Management and Assessment (IEMA) guidance; Health in Environmental Impact Assessment, it states that "<i>the Environmental Health Impact Assessment considers human receptors in relation to air and water quality, noise and light disturbance</i>". "<i>Furthermore, the socio-economics chapter of EIA's typically include the implications on public services (including health services), education and employment</i>".</p> <p>The Applicant does not believe a Health Impact Assessment is required in this case. However, if our local authority planners have policies as set out in the Central Lincolnshire Plan with guidance, they believe that major schemes like this do require a Health Impact Assessment. The IEMA document states that this should be conducted voluntarily as good practice. 7000 acres believes this should be standard and advocates the missed opportunity and clearly demonstrates the deficiencies within their EIA document. The Health Impact Assessment (HIA) looks at population health and the effects this scheme and the others would have on them and therefore would highlight health inequalities e.g. elderly population and those with dementia. An HIA is outcomes focused and clearly this is lacking in the current EIA produced by LANPRO.</p>	<p>Appendix 1 to <b>6.3.2.2 Environmental Statement - Appendix 2.2 EIA Scoping Opinion [APP-068]</b> sets out the list of public bodies, statutory undertakers, or authorities consulted by PINS for EIA Scoping in January 2022. Those responsible for health and wellbeing are:</p> <ul style="list-style-type: none"> <li>• Health and Safety Executive</li> <li>• NHS England</li> <li>• NHS Lincolnshire Clinical Commissioning Group (now ICB)</li> <li>• NHS Bassetlaw Clinical Commissioning Group (now Nottingham and Nottinghamshire ICB)</li> <li>• East Midlands Ambulance Service NHS Trust</li> <li>• West Lindsey District Council</li> <li>• Bassetlaw District Council</li> <li>• Nottinghamshire County Council</li> <li>• Lincolnshire County Council</li> </ul> <p>Those who responded to the consultation for EIA scoping, and their responses in full, are set out in Appendix 2 <b>[APP-068]</b>:</p> <ul style="list-style-type: none"> <li>• Health and Safety Executive</li> <li>• NHS Lincolnshire Clinical Commissioning Group (now ICB)</li> <li>• West Lindsey District Council</li> <li>• Bassetlaw District Council</li> <li>• Nottinghamshire County Council</li> <li>• Lincolnshire County Council</li> </ul> <p>Tables 5.10.1 to 5.10.4 to <b>5.10 Consultation Report - Appendix 5.10 - Section 42 Consultation Materials [APP-034]</b> sets out the list of public bodies, statutory undertakers, or authorities consulted by the Applicant for Section 42 statutory consultation in June 2022. Those responsible for health and wellbeing are:</p> <ul style="list-style-type: none"> <li>• Health and Safety Executive</li> <li>• NHS England</li> </ul>



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					<ul style="list-style-type: none"> <li>• NHS Lincolnshire Clinical Commissioning Group (now ICB)</li> <li>• NHS Bassetlaw Clinical Commissioning Group (now Nottingham and Nottinghamshire ICB)</li> <li>• NHS Nottingham and Nottinghamshire Clinical Commissioning Group (now ICB)</li> <li>• Public Health England / UK Health Security Agency</li> <li>• Lincolnshire Community Health Services NHS Trust</li> <li>• Nottinghamshire Healthcare NHS Foundation Trust</li> <li>• East Midlands Ambulance Service NHS Trust</li> <li>• West Lindsey District Council</li> <li>• Bassetlaw District Council</li> <li>• Nottinghamshire County Council</li> <li>• Lincolnshire County Council</li> </ul> <p>Those who responded to the Section 42 statutory consultation, their comments in full, and the Applicant's response to their comments, are set out in <b>5.13 Consultation Report - Appendix 5.13 - Section 42 Applicant Response [APP-037]</b>:</p> <ul style="list-style-type: none"> <li>• Health and Safety Executive</li> <li>• UK Health Security Agency</li> <li>• NHS Lincolnshire Clinical Commissioning Group (now ICB)</li> <li>• West Lindsey District Council</li> <li>• Bassetlaw District Council</li> <li>• Nottinghamshire County Council</li> <li>• Lincolnshire County Council</li> </ul> <p>The Applicant confirms that at the point of EIA Scoping (January 2022), Cottam Solar Project <b>[EN010133]</b>, Gate Burton Energy Park <b>[EN010131]</b> and the Scheme <b>[EN010132]</b>, were all in the public domain and EIA Scoping Reports had been submitted. Tillbridge Solar <b>[EN010142]</b> was not made public until autumn 2022.</p>

Ref	ExA FWQ's	Respondent	Question	Response	Applicant's Comment
					With regard to the requirement for a separate HIA, please refer to the Applicant's response to question 2.6.3 and 2.6.5 in <b>WB8.1.34 The Applicant's Response to ExA's Second Written Questions [REP5-039]</b> .
HW-06	2.6.7	West Lindsey District Council (LCC) <b>[REP5-047]</b>	<p><b>Electromagnetic field (EMF) – Effects on Human Health</b></p> <p>The Applicant has provided further information in response to questions and comments by members of the public, including those living near or adjacent to the Grid Connection Cable to show that even those closest to the cable route would not experience long-term health impacts as exposure rates would be significantly below ICNIRP monitoring levels.</p> <p>Environmental Statement Addendum 21.1: Human Health and Wellbeing Effects February 2024 [REP4-077] paragraph 4.3.3 discusses various references to EMF and Human Health throughout other documents. It has provided technical information which sets out the peak EMF likely to be generated by the Scheme and in the Shared Cable Route Corridor and has explained why there are no adverse associated health impacts.</p> <p>Please can Ips and other relevant health bodies confirm whether the explanation provide by the Applicant satisfactorily addresses concerns, and if not explain why not.</p>	WLDC has no further comments with regard to the EMF effects of the project.	The Applicant notes this comment.
HW-07	2.6.7	Roy Clegg <b>[REP5-083]</b>	<p><b>Electromagnetic field (EMF) – Effects on Human Health</b></p> <p>The Applicant has provided further information in response to questions and comments by members of the public, including those living near or adjacent to the Grid Connection Cable to show that even those closest to the cable route would not experience long-term health impacts as</p>	<p>Here, the Applicant has not provided information on the peak EMF likely to be generated and does not give the figures or explain how these may have been determined and this completely misleading. The Applicant has failed to be addressing the effect of EMF on Marine Life, Wildlife, Flora and Fauna and Biodiversity.</p> <p>The EA, ExA and the SOS will need to ensure they are protected from the legal requirements which protect the endangered, threatened and critically endangered species.</p>	<p>The Applicant refers to Section 21.2 of <b>6.2.21 Environmental Statement - Chapter 21 Other Environmental Matters [APP-059]</b> which sets out the anticipated peak EMF generated by the Scheme and the cumulative EMF from the Shared Cable Route Corridor, in context of ICNIRP exposure reference levels for humans.</p> <p>Indicative impacts of EMF on marine life in Risk Assessment of EMF Impacts on Fish at Appendix 1 of <b>WB8.1.17 Response to Written Representations at Deadline 1 Part 1 [REP3-034]</b>. The outcomes of this risk</p>

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			<p>exposure rates would be significantly below ICNIRP monitoring levels.</p> <p>Environmental Statement Addendum 21.1: Human Health and Wellbeing Effects February 2024 [REP4-077] paragraph 4.3.3 discusses various references to EMF and Human Health throughout other documents. It has provided technical information which sets out the peak EMF likely to be generated by the Scheme and in the Shared Cable Route Corridor and has explained why there are no adverse associated health impacts.</p> <p>Please can Ips and other relevant health bodies confirm whether the explanation provide by the Applicant satisfactorily addresses concerns, and if not explain why not.</p>		<p>assessment were agreed by the Environment Agency (as set out at ECO-12 of <b>WB8.3.5_B Statement of Common Ground with Environment Agency Revision B [EN010132/EX6/WB8.3.5_B]</b>. Monitoring is secured through <b>WB7.14_D Outline Operational Environmental Management Plan Revision D [REP5-020]</b>, which is secured by Requirement 14 of Schedule 2 to <b>WB3.1_G Draft Development Consent Order Revision G [EX6/WB3.1_G]</b></p>
HW-08	2.6.8	West Lindsey District Council (LCC) <b>[REP5-047]</b>	<p><b>500 Metre Buffer</b></p> <p>WLDC states that the 500m buffer area fails to capture the wider community that will experience the impacts of the project during construction, operation and decommissioning. It identifies that 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. It states that 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 [REP4-082]. Following receipt of the Deadline 4 Submission [REP4-077] please comment on the extent to which a stand-alone HIA could capture impacts on the wider community.</p>	<p>WLDC have provided comments on the value of a stand-alone HIA in previous responses above.</p> <p>With regard to the specific issue of the 500m buffer, WLDC are unclear how this distance has been determined and why it is representative of an area beyond which persons will not experience any impacts.</p> <p>This justification becomes important when considering the potential cumulative impacts on health and wellbeing as people who live beyond such buffers of project boundaries, but will inherently experience impacts during construction, operation and decommissioning, will not have been included in any assessments.</p>	<p>The Applicant refers to Agenda Item 5a of <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 their response to WLDC-14 in <b>WB8.1.31 The Applicant's Response to Deadline 4 and Deadline 4A Submissions [REP5-038]</b>.</p> <p>Please also refer to the responses to questions 2.6.1 and 2.6.2 in <b>WB8.1.34 The Applicant's Response to ExA's Second Written Questions [REP5-039]</b> relating to a standalone HIA.</p>
HW-09	2.6.8	7000 Acres <b>[REP5-051]</b>	<p><b>500 Metre Buffer</b></p> <p>WLDC states that the 500m buffer area fails to capture the wider community that will experience the impacts of the project during construction, operation and</p>	<p>7000Acres agrees with WLDC that a 500m buffer will fail to capture the wider community that will experience the impacts during the 60+ years of construction, operation and decommissioning of this scheme.</p>	<p>The Applicant refers to Agenda Item 5a of <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 their response to WLDC-14 in <b>WB8.1.31 The Applicant's</b></p>

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			decommissioning. It identifies that 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. It states that 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 [REP4-082]. Following receipt of the Deadline 4 Submission [REP4-077] please comment on the extent to which a stand-alone HIA could capture impacts on the wider community.	In our response to 2.6.3 we have identified a number of major areas which the Applicant has failed to assess. A stand-alone HIA will capture the wider issues, and combination of factors, the current ES lacks.	<b>Response to Deadline 4 and Deadline 4A Submissions [REP5-038].</b>  Please also refer to the responses to questions 2.6.1 and 2.6.2 in <b>WB8.1.34 The Applicant's Response to ExA's Second Written Questions [REP5-039]</b> relating to a standalone HIA.
HW-10	2.6.9	7000 Acres [REP5-051]	<b>Long-term Health Impacts</b>  WLDC does not believe the Applicant's assessment adequately considers the construction and long-term impacts of the cumulative schemes on local residents' health and wellbeing who use these roads for recreational purposes.  Please can the Applicant set out how the ES has taken into account the local amenity impact of the cumulative construction traffic associated with the proposed solar schemes, as well as access to local health services, and the impact on the mental health that traffic could have on the community.	7000Acres agrees with WLDC's assessment. Please see our detailed comments in REP1A-015.	Please refer to the Applicant's response to question 2.6.9 in <b>WB8.1.34 The Applicant's Response to ExA's Second Written Questions [REP5-039]</b> , and to Section 2.9 of <b>WB8.1.18 Response to Written Representations at Deadline 1 Part 2 [REP3-035]</b> , written in response to 7000Acres' previous representation [REP1A-015].
<b>2.7 Historic Environment</b>					
HE-01	2.7.1	Lincolnshire County Council (LCC) [REP5-042]  Nottinghamshire County Council (LCC) [REP5-043]  <i>Joint response</i>	<b>Conclusions against Archaeological Policy and Guidance</b>  The Applicant and LCC/NCC are asked to set clearly set out, ideally in tabular form, their positions on the Applicant's approach to archaeological management and mitigation in terms of how this either complies with, or does not comply with, the provisions of relevant legislation, policy and guidance. This should include consideration of the implications of the Applicants 'without	[See table at end of submission doc: <a href="#">EN010132-001782-Lincolnshire County Council – Responses to the ExAs Second Written Questions.pdf</a> ( <a href="http://planninginspectorate.gov.uk">planninginspectorate.gov.uk</a> )]	As evidenced in the Applicant's Response to 2.7.1 of the EXA Second Written Question the Applicant's approach to archaeological management and mitigation complies with relevant legislation, policy and guidance (see Appendix 1 and 2) [REP5-039].  The Applicant considers that it has taken a reasonable, proportionate and consistent approach to the archaeological evaluation guided by national and local guidance that has enabled the collection of high-quality reliable data. This has provided an adequate

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			<p>prejudice' Written Scheme of Investigation [REP4 075]. Where references are made to current professional guidance, clear references and links to these provisions should be given.</p> <p>In addition, where it is suggested that the Applicants approach does not comply with relevant provisions, LCC/NCC are asked to clearly identify what further field evaluation and mitigation work would be required in order to address any suggested inadequacies.</p>		<p>understanding of the archaeological potential and developmental impacts as set out in <b>6.2.13 Environmental Statement Chapter 13 Cultural Heritage [APP-051]</b> and has been used to formulate an appropriate mitigation strategy as set out in <b>6.3.13.7 Environmental Statement Appendix 13.7 Archaeological Mitigation WSI [REP5-016]</b>.</p> <p>As defined by the Chartered Institute for Archaeologists an "archaeological field evaluation is a programme of non-intrusive and/or intrusive fieldwork. The Applicant highlights the whole site has been subject to an archaeological evaluation. In the first instance this comprised <b>6.3.13.2 Environmental Statement – Appendix 13.2 Archaeological Geophysical Survey Reports [APP-109 to APP-114]</b>, <b>6.3.13.4 Environmental Statement – Appendix 13.4 AP (Air Photo) and LiDAR Reports [APP-116]</b>, which successfully identified the absence/ presence/ extent of archaeological sites within the Order limits of the Scheme. An informed programme of <b>6.3.13.6 Environmental Statement – Appendix 13.6 Archaeological Evaluation Trenching Reports [APP-120 to APP-121]</b> both verified the results of the non-intrusive assessments, and where archaeological deposits had been identified, provided further information regarding their extent, character, preservation, and archaeological significance.</p> <p>The Applicant is not aware of any published local or national guidance that sets out the required percentage of evaluation trial trenching required to support a planning application for a proposed development that has a low impact to buried archaeology.</p> <p>The Applicant considers that the sample of evaluation trenching requested by LCC 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</p>

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					<p>Evaluation as defined by the Chartered Institute for Archaeologists (CifA).</p> <p>All areas proposed for concrete feet have been subject to evaluation trial trenching in line with a Written Scheme of Investigation and trench plans agreed by LCC (Please see Table 2.1 <b>[REP10-061]</b>). Consequently, the Applicant respectfully disagrees with the statement <i>"The archaeological potential for the proposed piling areas has not been adequately investigated and there is insufficient baseline evidence to understand archaeological significance or assess harm."</i></p> <p>In response to LCC's comment regarding the High Court Appeal decision in R. (Low Carbon Solar Park 6 Ltd) v SoS, 5<sup>th</sup> April 2024, the Applicant questions the relevance of this case to the Scheme as the judicial challenge solely related to a matter regarding procedural fairness and not the appropriateness of the Inspector's consideration or conclusions on the extent of archaeological surveys undertaken.</p> <p>In any event, the Applicant understands that in that case the archaeological officer at Essex County Council (ECC) requested two areas of archaeological potential identified by geophysical survey to be removed from ground works or use a panel design using surface mounting (which highlights concrete feet are considered a suitable form of mitigation). Targeted evaluation trenching was requested in a third area to define the archaeological significance of buried remains identified by the geophysical survey. This is in contrast to the Scheme where the main discord with LCC relates to blanket trenching across 'blank' areas where no archaeological potential has been identified by geophysical survey.</p> <p>In the event that the Secretary of State is minded to agree with LCC and NCC that there is a requirement for further trenching to inform the mitigation measures or detailed design of the Scheme, the Applicant believes that such trenching can be undertaken post-determination of the DCO application, and in advance of the construction of the Scheme. A without prejudice archaeological WSI <b>[REP5-033]</b> has therefore been prepared that includes a</p>

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					programme of further 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.
HE-02	2.7.2	Lincolnshire County Council (LCC) <b>[REP5-042]</b> Nottinghamshire County Council (LCC) <b>[REP5-043]</b> <i>Joint response</i>	<b>Archaeological management and mitigation</b>  Paragraph 2.10.110 of the National Policy Statement (NPS) EN-3 sets out that archaeological deposits may be protected by a solar PV farm if the site is removed from regular ploughing and shoes or low-level piling is stipulated. The Design Parameters [REP3-020] states that the maximum depth of the Mounting Structure piles will be 3.5m below ground. Table 3-3 of the outline Construction Environmental Management Plan [REP3-018] states that areas where concrete feet are required will be laid out by a surveyor in line with the requirements of the Written Scheme of Investigation (WSI). Further detail of this is set out in paragraphs 3.14 to 3.18 of the outline WSI [REP5-016]. Noting the concerns expressed by LCC/NCC about the use of this means of mitigation (for example in LCC Local Impact Report, para 12.18 [REP1A-022]), comments are invited on the implications of Para 2.10.110 of EN-3 for the scheme as proposed.	<p>The question of ploughing is not relevant as we understand fields here are generally harrowed annually rather than ploughed (2.2.3 of ExQ2).</p> <p>Piling will affect archaeology as soon as it penetrates deeper than the topsoil, and by 3.5m it will have punctured all but the very deepest features such as wells or quarry pits. Effective mitigation requires sufficient site-specific evaluation to know where the archaeology is and its extent, character, significance and depth. Avoidance and limited impact solutions are certainly elements which can be used in a fit for purpose archaeological mitigation strategy but it needs to be based on enough baseline information to understand where the mitigation areas need to be and what type of mitigation response is reasonable.</p> <p>Regarding shoes or low-level piling as mitigation techniques require a full understanding of the depth, extent, importance and nature of the surviving archaeology. Any proposal in archaeologically sensitive areas will require a firm evidence base proving that any work including refitting and decommissioning will have no impact upon the archaeology. This must include not only direct destructive impacts through groundworks, compaction or reduction in the depth of soil necessary for protecting the archaeology but also through environmental changes such as changes to hydrology or soil composition which would be detrimental to the surviving archaeology.</p>	<p>As evidenced during the archaeological evaluation, agricultural activity, including ploughing, harrowing and land drains etc, has adversely impacted buried archaeological remains (please see Appendix 13.2 Archaeological Geophysical Survey Reports <b>[APP-109 to APP-114]</b> and p.9 of Appendix 13.6: Archaeological Evaluation Trenching Reports <b>[APP-120]</b>).</p> <p>Please see the Applicant's response to Question 2.2.3 of the EXA Second Written Question <b>[REPS-039]</b>.</p> <p>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 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, simply to claim that the land is harrowed rather than ploughed adds little information. It is therefore highlighted by the Applicant that harrowing also causes an adverse impact to buried archaeological remains.</p> <p>The Applicant also highlights LCC assertions to relevance of plough damage to buried archaeological remains is in direct contrast to their response to the Question 1.7.4 of the <b>Examiners First Written Questions [REP3-042]</b>, where LCC stated <i>"The vast majority of archaeology found in Lincolnshire is on land in agricultural use and while ploughing undoubtedly has an impact on archaeology within the ploughzone"</i>.</p>

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					<p>Please see the Applicant's Response to Deadline 2 and 3 Submissions [REP4-066] and Question 2.7.3 of the ExA Second Written Questions [REP5-039].</p> <p>As evidenced in <b>6.3.13.7 Environmental Statement Appendix 13.7 Archaeological Mitigation WSI [REP5-016]</b> all areas proposed for concrete feet have been subject to evaluation trial trenching.</p> <p>As detailed at ISH5 (<b>Summary of Oral Submissions [REP5-037]</b>), the Applicant is not aware of any information that provides evidence to support LCC/NCC opinion that concrete feet cause adverse effects such as compaction. On the contrary, available guidance states concrete feet are an acceptable form of mitigation for preserving archaeological remains in-situ (i.e. guidance by Cornwall Council<sup>4</sup> and Historic England<sup>5</sup>).</p>
HE-03	2.7.3	<p>Lincolnshire County Council (LCC) [REP5-042]</p> <p>Nottinghamshire County Council (LCC) [REP5-043]</p> <p><i>Joint response</i></p>	<p><b>Archaeological field evaluation</b></p> <p>In their response to WQ 1.7.2 [REP3-042], LCC have suggested that other NSIPs in Lincolnshire have undertaken full coverage of the redline boundary and as a result have identified significant archaeological sites during the trenching phase which are then dealt with as part of an informed effective mitigation strategy. Similarly, NCC have suggested that the Applicant has not adequately or systematically identified the nature of the archaeological deposits [REP3-043].</p> <p>The Applicant's further report '<i>Comparison of Archaeological Evaluation Investigations on Solar Schemes</i>' [[REP4-001] concludes that there is a lack of a standard approach to archaeological evaluation works. LCC/NCC are asked to comment on the implications of this report for the field evaluation</p>	<p>This report is useful in demonstrating the widely variable nature of responses to solar schemes. From our own joint LCC/NCC experience we believe that in part at least this is because the full impacts of these schemes are only gradually being appreciated.</p> <p>The Council's understanding of the impact of solar farms has evolved as we have dealt with increasing numbers of them in Lincolnshire and as more details of the specific impacts have come to light. These impacts are both in terms of specific ground impacts such the use of piles rather than simply spikes for fixing arrays and the amount and depth of cable trenching, and the cumulative aspects of impacts through the lifetime of the scheme, ie decommissioning and successive refits which will multiply the site-specific ground impacts.</p> <p>With enhanced understanding of the damage the schemes can inflict on buried archaeological remains, plus the cumulative impacts of adjacent schemes covering thousands of hectares of an archaeological sensitive landscape, the realisation of the potential scale of loss of the archaeological resource without proper record and no public benefit is a cause of immense professional concern, and should be to all archaeologists.</p>	<p>The Applicant respectfully disagrees that recent experience of the development of solar schemes has demonstrated that they cause a high level of impact to buried archaeological remains, and justify a large quantity of trenching that is in line with housing or commercial schemes, which have the potential to caused up to 100% ground disturbance. The Applicant considers that this assertion contradicts paragraph 2.10.109 of NPS EN-3 (November 2023).</p> <p>Please refer to the <b>Comparison of Archaeological Evaluation Investigations on Solar Schemes [REP4-001], Summary of Oral Submissions at the Issue Specific Hearing (ISH5) [REP5-037]</b>, the draft <b>Statement of Common Ground [REP1-061]</b> and the <b>Statement of Commonality [REP5-025]</b>.</p>

<sup>4</sup> BRE (2013) Planning guidance for the development of large scale ground mounted solar PV systems (Online, last Accessed 03.04.24) [https://files.bregroup.com/solar/KN5524\\_Planning\\_Guidance\\_reduced.pdf](https://files.bregroup.com/solar/KN5524_Planning_Guidance_reduced.pdf)

<sup>5</sup> Historic England. 2021. Commercial Renewable Energy Development and the Historic Environment. Historic England Advice Note 15. Swindon, Historic England. Paragraph 68, p. 16



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			undertaken by the Applicant for the Proposed Development.		
HE-04	2.7.4	Lincolnshire County Council (LCC) <b>[REP5-042]</b> Nottinghamshire County Council (LCC) <b>[REP5-043]</b> <i>Joint response</i>	<b>Field Evaluation</b> Noting that the comments made jointly by LCC/NCC [REP4-080] refer to the offer to facilitate 'an appropriate scheme of trenching evaluation before the determination to allow the results to inform a reasonable and robust site specific mitigation strategy'. LCC/NCC are asked to please clarify exactly what is envisaged in terms of the additional percentage required and where this would be targeted, and also when this would need to take place.	As the Council has consistently stated the full impact zone needs to be adequately evaluated, as stated in the hearing we are content to move forward with the agreed 2% trenching so that needs to be across the remaining 79% of the impact zone.  The trenching strategy will need to target potential archaeology identified from the DBA, AP and LiDAR assessment, and geophysical survey results. The trenching strategy will also need to target those areas where the above have not been successful in locating archaeology. Targeting blank areas is an essential part of determining the archaeological potential across a proposed development as different types of archaeology and geology may limit or mask the effectiveness of non intrusive evaluation techniques.  Sufficient trenching will be required across the full impact zone to determine the presence, absence, significance, the depth and extent of any archaeological remains which could be impacted by the development.  As stated above the timely provision of trenching results are needed to inform the baseline evidence and subsequent informed fit for purpose mitigation strategy. Ideally this should be in advance of the determination and certainly the results are needed in advance of the work programme commencing in any of the areas not currently adequately evaluated.	The Applicant refers LCC and the ExA to the update that was provided by the Applicant at Issue Specific Hearing 4 on 8 February, Issue Specific Hearing 5 on the 13 <sup>th</sup> March and Statement of Common Ground, LIR Ref LCC 12.15-LCC 12.16 in the <b>8.1.20 Applicant's Response to Local Impact Reports [REP3-037]</b> . Please see the <b>Written Summary of the Applicant's Oral Submissions at the Issue Specific Hearing (ISH4) [REP4-071], Oral Submissions at the Issue Specific Hearing (ISH5) [REP5-037]</b> , the draft <b>Statement of Common Ground [REP1-061]</b> , and the <b>Statement of Commonality [REP5-025]</b> .  All areas where an archaeological potential was identified from baseline information and non-intrusive evaluation (i.e. targeting potential archaeology identified from the DBA, AP and LiDAR assessment, and geophysical survey results) have been subject to evaluation trial trenching. Therefore Section 13.5 of <b>6.2.13 Environmental Statement - Chapter 13_Cultural Heritage [APP-051]</b> is sufficient in determining the presence, absence, significance, the depth and extent of any archaeological remains which could be impacted by the development.  Therefore the Applicant respectfully disagrees with LCC and considers that sufficient evaluation, proportionate to the stage at which the Scheme is at, has been undertaken to inform the DCO Application and any mitigation works required as part of the written scheme of investigation (as set out in <b>6.3.13.7 Environmental Statement - Appendix 13.7 Archaeological Mitigation WSI (Written Scheme of Investigation) [REP5-016]</b> as secured by Requirement 12 of Schedule 2 in <b>3.1_G Draft Development Consent Order Revision G [EX6/WB3.1_G]</b> ).  The Applicant considers that the sample of evaluation trenching requested by LCC 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

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					<p>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). 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 sufficient and paralleled elsewhere in the North / 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> <p>It should also be noted that there is no evidence to support LCC's assertion that geological responses have masked the effectiveness of non-intrusive evaluation techniques within the Scheme.</p>
HE-05	2.7.9	West Lindsey District Council (LCC) <b>[REP5-047]</b>	<p><b>Stow Park Medieval Bishops Place and Deer Park</b></p> <p>Following on from the discussion at ISH5 in relation to the nature of the harm to the Scheduled Monument, that parties are asked to clearly set out their respective positions in relation whether and how policy provisions differentiate between physical harm to designated heritage assets and harm to their setting.</p>	<p>WLDC maintains its view set out in the LIR and Written Representation with regard to the unacceptable harm the West Burton Solar Project will have on the Scheduled Monument at Stow Park Medieval Bishop's Palace and Deer Park.</p> <p>The Secretary of State has a statutory duty to have regard to impacts development has on listed buildings, conservation areas and scheduled monuments, set out in Regulation 3 of the Infrastructure Planning (Decisions) Regulations 2010. Regulation 3 requires that when deciding applications for development consent which affects or is likely to affect a scheduled monument or its setting, the decision maker must have regard to the desirability of preserving the scheduled monument or its setting.</p> <p>It is inherent therefore that the statutory duty to protect relates to impacts that affect the setting of a monument and not purely direct physical harm.</p> <p>It is clear from the schedule description, underpinned by information and evidence, that the historic importance of the designated Scheduled Monuments of the Bishop's Palace and the park pales are defined and bound by the deer park to which they relate and frame. The park was naturally a rural landscape and it is this character that is integral to the importance of the Scheduled Monument. Any degradation or erosion of that landscape character will cause significant harm to the setting of the Scheduled Monuments.</p> <p>NPS EN-1 (2023) requires the Secretary of State to give great weight to the conservation of a heritage asset, irrespective of whether any potential harm amounts to substantial, total loss, or less than substantial harm to its significance (para. 5.9.25). Substantial harm to Scheduled Monuments should be "wholly exceptional" (para. 5.9.28). Where a proposed development will lead to substantial harm of a designated asset, the Secretary of State should refuse consent unless it can be demonstrated that the substantial harm to, or loss of,</p>	<p>The Applicant respectfully disagrees with West Lindsey's assertion that <i>"It is clear from the schedule description, underpinned by information and evidence, that the historic importance of the designated Scheduled Monuments of the Bishop's Palace and the park pales are defined and bound by the deer park to which they relate and frame. The park was naturally a rural landscape and it is this character that is integral to the importance of the Scheduled Monument. Any degradation or erosion of that landscape character will cause significant harm to the setting of the Scheduled Monuments."</i></p> <p>As evidenced in paragraph 2.1.6 of the Stow Park Cultural Heritage Position Statement <b>[REP5-027]</b> the Historic England Official List Entry does not include any post-medieval or modern features within the scheduling information. The list entry clearly distinguishes between the remains of the ruined Moat Farm and any potential surviving remains of the Bishop's Palace: "all fences, gates, and all standing buildings and modern surfaces at Moat Farm are excluded from the scheduling, although the ground beneath them is included". This demonstrates that the emphasis of the listing is on the heritage values associated with the medieval phases of occupation of the site, buried evidence of which is potentially preserved under the later activity, and that subsequent post-medieval and modern activity is not considered to form part of the scheduling.</p>

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				<p>significance is necessary to achieve substantial public benefits that outweigh that harm or loss. Loss of significance relates to the setting of Scheduled Monument and not simply direct physical harm.</p> <p>Policy S57 of the CLLP requires proposals to protect, conserve and seek opportunities to enhance the environment of Central Lincolnshire. Development that will result in substantial harm to, or the total loss of, a designated heritage asset will only be granted permission where it is necessary to achieve substantial public benefits that outweigh the harm or loss (or subject to a range of criteria relating to viability and use of an asset).</p> <p>The West Burton Solar Project ES concludes a 'large adverse' impact upon the bishops palace Scheduled Monument. WLDC consider this to equate to 'substantial harm' for the purposes of NPS, NPPS and CLLP policy. WLDC considers that the significance of a medieval deer park relates not only to the containment and protection of deer, but also the wider character of the landscape. As a consequence, this setting would experience substantial harm by the loss of rural character that would entail by the existence of solar panels.</p> <p>During ISHs, the applicant has attempted to justify the adverse impacts on the basis that the current landscape has changed from the original medieval landscape. This is clearly apparent as landscapes change over time, however the historic importance of the Scheduled Monuments are defined by rural landscape that still exists today. In it unquestionable that the assets are currently read and understood in relation to the rural landscape character that they frame. The applicant, however, takes the position that, as the rural landscape has changed since medieval times (albeit still a rural landscape that can be understood), the construction of modern solar panels of up to 4.5metres in heigh with modern utilitarian boundary fencing makes no difference in terms of that landscape character and the role it has in defining the setting of the Scheduled Monument.</p> <p>WLDC wholly disagrees with the position advanced by the applicant. The setting of the Scheduled Monuments would be materially harmed through the construction of solar panels, the fact no direct physical harm to the Scheduled Monuments does not avoid the statutory duty and policy requirement to conserve their setting.</p> <p>WLDC notes that this view is shared by Historic England and that the only remedy that would alleviate the harm caused would be the removal of all panels within the Deer Park.</p> <p>The approach taken by the applicant and their attempts to justify the acceptability of the impacts of the project on the Scheduled Monument has been flawed.</p> <p>During EIA scoping and statutory pre-application phases of the project, the applicant was made aware, by Historic England, that the siting of solar panels</p>	<p>There is also no suggestion that the subsequent post-medieval or modern activity contributes to the heritage values and therefore significance of the Scheduled Monument. Conversely, the list entry emphasises the adverse effect of later agrarian land uses as the south-western park pale is "now partly infilled, which is visible as a dry depression", and the inner ditch of the south-eastern park pale "has been replaced by a modern drain and is no longer evident". The listing also states the easternmost pond to the north of the Moat—which is located outside the Scheme Order Limits— "has been partly infilled, and the dam retaining it lowered by modern ploughing", such that the only remains of this pond would "survive as buried archaeological deposits". Likewise, the southern and western outer banks of the bishop's palace have "been reduced by modern ploughing and now survives as a low earthwork about 0.5m high".</p> <p>The Applicant would like to point out that "rural landscape" is a subjective term to mean landscape within the countryside. The term rural could be used to describe a number of land uses. The current character of the land within the enclosed deer park can be described as agrarian, however when the deer park was in use in the medieval period, the landscape character would be better described as managed high status land. As such, although both these characters could be described as rural, there is considerable difference between the two uses and the contribution these character types make to the significance of the asset would also be distinct, despite both being broadly rural.</p> <p>The Applicant believes, as evidenced by the Official List Entry for the Scheduled Monument (See Section 2, Paragraphs 2.1.3 to 2.1.7 of [REP5-027]), that the significance of the Scheduled Monument is primarily derived from its historical and archaeological interest, vested in the Scheduled earthwork features and potential below ground remains, together with that appreciated through desk-based research, particularly aerial imagery and historical documentation. Setting contributes to the understanding of these heritage interests, albeit denuded by the current composition of the landscape in which the Scheduled Monument is located. The post-medieval and modern agrarian land use does preclude the ability to</p>

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				<p>within the setting of the Scheduled Monument would be unacceptable. The applicant has chosen to ignore this consistent and well evidenced advice, seeking to justify the harm (putting aside the statutory duty to conserve) by stating that the removal of panels would be <b>'too detrimental to the scheme'</b> and that it would be <b>'temporary and reversible'</b> (Consultation Report, Appendix 5.13: Section 42 Applicant Response, pp.415-419). This justification is weak in that, no evidence has been provided to demonstrate what 'too detrimental to the scheme' means in policy terms; in any even the commercial viability of a project does not constitute a reason to override the statutory duty; and the lifespan of the project for 60 years means that the project should be considered 'permanent' and not a temporary impact.</p> <p>WLDC therefore object to the proposal on the strongest grounds with regard to the substantial harm caused to the bishop's palace and deer park Scheduled Monument.</p>	<p>experience or appreciate the former medieval landscape of the Scheduled Monument. Furthermore, this same post-medieval and modern activity has resulted in an adverse effect on elements within its setting as evidenced in the list entry which deliberately excludes post-medieval and modern features and highlights the adverse direct impacts that agricultural activity has had on portions of the Scheduled Monument. The reversible nature of the Scheme means that any harm to significance as a result of changes in the setting of the Scheduled Monument would be temporary and reversed entirely following decommissioning of the Scheme.</p> <p>Consequently, through thorough assessment, the Applicant does not consider that the Scheme would cause substantial harm to the medieval bishop's palace and deer park, Stow Park (NHLE 1019229). The Scheme would not cause any direct impact to the fabric of the Scheduled Monument, and there would be no adverse effects to its heritage values that would result in its permanent loss either wholly or in part and consequently the legibility of the deer park would be unaltered. Any effects resulting in a level of harm to the significance of the monument would be derived from changes to its setting through the placement of panels within land that was formerly occupied by the medieval deer park.</p> <p>The Applicant refers to paragraphs 3.1.24 to 3.1.25 of the Stow Park Cultural Heritage Position Statement <b>[REP5-027]</b>, which detail the Applicant's justification for their conclusion that the level of harm is less than substantial harm, as well as the policy tests that are relevant to the DCO application and the proposed development within the former Stow Park deer park area.</p>
HE-06	2.7.9	Historic England <b>[REP5-058]</b>	<p><b>Stow Park Medieval Bishops Place and Deer Park</b></p> <p>Following on from the discussion at ISH5 in relation to the nature of the harm to the Scheduled Monument, that parties are asked to clearly set out their respective positions in relation whether and how policy provisions differentiate between physical harm to</p>	<p>In ISH5 we set out the following key points:-</p> <p>Policy does not differentiate between harm to an asset caused by direct physical action and setting impacts both are potential sources of harm, which can be less than substantial or substantial.</p> <p>In EN-1 March 2023 under 5.9 Historic Environment, setting impacts are clearly and consistently framed in respect of assets, there is no differentiation between harm caused by direct physical action and harm caused to significance through change in setting. Differentiation is confined to level of harm and the importance of the assets effected. This is also the case in EN 1 2011 5.8.14 &amp; 5.8.15.</p>	<p>The Applicant agrees with Historic England that "policy does not differentiate between harm to an asset caused by direct physical action and setting impacts both are potential sources of harm, which can be less than substantial or substantial", and that "substantial harm to the significance of a Scheduled Monument can be caused by setting impacts upon its significance."</p> <p>The Applicant understands that the disagreement with Historic England relates to the extent that the setting of the deer park contributes to the significance of the</p>

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			<p>designated heritage assets and harm to their setting.</p>	<p>See also EN 01 2023</p> <p>3.10.109 <i>As the significance of a heritage asset derives not only from its physical presence but also from its setting, careful consideration should be given to the impact of large-scale solar farms which depending on their scale, design and prominence, may cause substantial harm to the significance of the asset.</i></p> <p>Fn 228 The setting of a heritage asset is the surroundings in which it is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset and may affect the ability to appreciate that significance or may be neutral.</p> <p>Fn 233 Relevant guidance is given in the Historic England publication, The Setting of Heritage Assets See <a href="https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/">https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/</a></p> <p>Substantial Harm to the significance of a Scheduled Monument can be caused by setting impacts upon its significance.</p> <p>Given that policy (EN-3 3.10.109) specifically recognises that setting impacts can cause substantial harm to the significance of the asset (ie without direct physical impacts on the asset itself) then one must consider the degree of impact in this case. As we set out in our response to ExA Q 1.7.7 <i>"The whole park, ... including the palace, pale and enclosed park as a private space cut out of the medieval landscape for the enjoyment of the Bishop and his guests. The enclosed space is intrinsic to the significance of the scheduled monument."</i> It is hard to envisage a more substantially harmful setting impact upon an designated heritage asset than one such as that proposed at Stow Park where the most central attribute of a park, that it encloses a space of countryside for private uses, is subverted by that space being filled with solar panels. The Bishop's Palace at Stow is first described in Gerald of Wales' life of St Hugh of Avalon 1140-1200, Bishop of Lincoln in which its woods and ponds form the bucolic setting for his friendship with the great swan which features in iconographic representations of the saint, this was a place of contemplation as well as display.</p>	<p>Medieval Bishop's Palace and Deer Park, Stow Park (NHLE 1019229), and the level of harm caused by impact to significance of the asset derived by its setting (Table 3.1 of the Statement of Common Ground with Historic England <b>[EX6/WB8.3.3_A]</b>).</p> <p>The Applicant refers to Stow Park Cultural Heritage Position Statement <b>[REP5-027]</b>, which details the composition of the Scheduled Monument and the contribution made by setting to its significance with consideration to the Historic England Official List Entry, the Applicant's justification for their conclusion that the level of harm is less than substantial harm (at the upper end of the scale), as well as the policy tests that are relevant to the DCO application and the proposed development within the former Stow Park deer park area.</p> <p>It is acknowledged by the Applicant that substantial harm to or loss of significance of assets of the highest significance, which includes Scheduled Monuments such as The medieval bishop's palace and deer park, Stow Park (NHLE 1019229), should be wholly exceptional and consent should be refused for that element of the Scheme unless it can be demonstrated that the substantial harm to or loss of significance is necessary to achieve substantial public benefits (see Section 3 of the Stow Park Cultural Heritage Position Statement <b>[REP5-027]</b>).</p> <p>As evidenced at ISH5 (Oral Representation of which are provided in <b>[REP5-037]</b>), in the SoCG with Historic England <b>[EX6/WB8.3.3_A]</b> and the Stow Park Cultural Heritage Position Statement <b>[REP5-027]</b>, the Applicant understands the Scheduled Monument derives its significance from its historic interest as the sole surviving element of a former enclosed medieval space, which is largely understood through desk-based research, particularly aerial imagery and historical documentation. This is confirmed by the Reasons for Designation set out in Official List Entry for the Scheduled Monument (see Section 2 of Stow Park Cultural Heritage Position Statement <b>[REP5-027]</b>). The post-medieval and modern agrarian landscape, the former MOD petroleum site and the railway, which bisects the Scheduled Monument, have a detrimental effect on the ability to appreciate any remaining elements of the</p>

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					<p>former medieval landscape and are consequently considered to have a detrimental effect on the overall contribution made by setting to the significance of the Scheduled Monument.</p> <p>The Applicant considers the Scheme would not cause any direct physical harm to the significance of the Scheduled Monument as there is no proposed intervention to the fabric of any of the sections of the Scheduled Monument that would result in its permanent loss either wholly or in part. Any harm would be only that caused to the significance of the monument that is derived from its setting, which is set out above as making a lesser contribution to significance than the physical remains, which have considerable historic and archaeological interest. This would occur through the placement of panels within land that was formerly occupied by the medieval deer park.</p> <p>The only surviving earthworks of the medieval deer park are designated and form the three separate elements of a Scheduled Monument, all of which are, importantly, located outside of the Order Limits for the Scheme. As stated above, the Applicant highlights that the full historic boundary of the deer park can only be postulated from historic sources and so there is difficulty in using the historic deer park boundary and the remaining scheduled vestiges synonymously.</p>
HE-07	2.7.10	West Lindsey District Council (LCC) <b>[REP5-047]</b>	<p><b>Stow Park Medieval Bishops Place and Deer Park</b></p> <p>Historic England concludes that the Proposed Development would cause substantial harm to the significance of the Scheduled Ancient Monument (SAM) through the loss of its character as a bounded architectural space. Should the Secretary of State agree with that conclusion, the parties are asked to set out the implications for the determination of the Proposed Development, with reference to relevant policy provisions, including reference in NPS EN-1 2011 and NSP EN-1 2023 setting out</p>	<p>WLDCs position on the unacceptable harm caused to the Stow Park Medieval Bishop's Palace and Deer Park is set out in answer to question 2.7.9 above and is applicable to this question so is not repeated verbatim here but should be read as a response.</p> <p>WLDC consider that the starting point must always been with the statutory duty to have regard to the desirability of preserving the scheduled monument or its setting.</p> <p>The imposition of modern utilitarian solar panels and associated infrastructure in a rural landscape that forms the setting and makes a significant contribution to the historic significance of the scheduled monument will clearly fail to the statutory duty and relevant policy in that it will cause substantial harm to its setting.</p>	<p>The Applicant respectfully disagrees with West Lindsey's assertion the <i>"The imposition of modern utilitarian solar panels and associated infrastructure in a rural landscape that forms the setting and makes a significant contribution to the historic significance of the scheduled monument will clearly fail to the statutory duty and relevant policy in that it will cause substantial harm to its setting"</i>.</p> <p>The Applicant refers to their response to Question 2.7.9 (HE-05) in this document and the <b>Stow Park Cultural Heritage Position Statement [REP5-027]</b>, which details the composition of the Scheduled Monument and the contribution made by setting to its significance with consideration to the Historic England Official List Entry, the Applicant's justification for their conclusion that the</p>

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			<p>that 'substantial harm to or loss of designated assets of the highest significance, including Scheduled Monuments.....should be wholly exceptional'.</p> <p>Additionally, noting the Applicants conclusions that there would be less than substantial harm at the upper end of the spectrum, should the Secretary of State accept this position, the Applicant is asked clearly set out how the suggested public benefits would outweigh that harm.</p>	<p>WLDCs position is that substantial harm is clearly caused as the landscape to which the importance of the assets relate (land to which their historic function purpose and relationship relates) will be materially altered in landscape character to the extent that the purpose of the assets would no longer be recognised or understood.</p> <p>Once substantial harm is concluded, policy tells decision makers that such harm should only be 'wholly exceptional'. In this context, the bar is high, and would relate to national policy objectives not being realised. There is no evidence that the removal of solar panels from the setting of the scheduled monument would compromise the achievement of national policy, and this the 'wholly exceptional' test would not be satisfied. The fact that this individual project would be smaller in terms of installed capacity is not a reason that satisfies the 'wholly exceptional' test.</p> <p>Furthermore, the applicant states that, based upon the assessed 40 year project lifespan, the harm would be at 'top end of spectrum' of less than substantial harm. Notwithstanding WLDCs disagreement with this conclusion, which has been justified on the basis of 'temporary' impacts over a very long period of time, the applicant has not provided a re-assessment of the impacts to explain how the now proposed additional 20 years lifespan (to 60 years) has affected this conclusion. If the project was concluded to be at the 'top end' of the 'less than substantial harm' spectrum, it is unclear how it can be justified that the harm remains at the 'top end' following the imposition of a further 20 years of such harm.</p> <p>WLDC deem the impacts unacceptable, amounting to substantial harm to the setting of the scheduled monument. The project itself does not satisfy the very high bar of being 'wholly exceptional' and therefore policy tells decision makers to refuse consent where such harm is apparent.</p>	<p>level of harm is less than substantial harm, as well as the policy tests that are relevant to the DCO application and the proposed development within the former Stow Park deer park area.</p> <p>The Applicant acknowledges the original assessment was undertaken on the assumption of the Scheme operation would be for approximately 40 years. The Applicant believes the commitment to reverse the Scheme means that the duration of the Scheme (either 40 or 60 years) does not evoke the need for further assessment or would result in an increase in the level of harm to the significance of the Schedule Monument that is derived from its setting. This is set out in <b>8.2.3 Review of Likely Significant Effects at 60 Years [REP1-060]</b> which states there are no changes to the assessment of significant effects as set out in <b>6.2.13 Environmental Statement - Chapter 13_Cultural Heritage [APP-051]</b> on the basis of assessment of a 60-year operational lifetime against a 40-year operational lifetime</p>
HE-08	2.7.10	Historic England [REP5-058]	<p><b>Stow Park Medieval Bishops Place and Deer Park</b></p> <p>Historic England concludes that the Proposed Development would cause substantial harm to the significance of the Scheduled Ancient Monument (SAM) through the loss of its character as a bounded architectural space. Should the Secretary of State agree with that conclusion, the parties are asked to set out the implications for the determination of the Proposed Development, with reference to relevant policy provisions, including reference in NPS EN-1 2011 and NSP EN-1 2023 setting out</p>	<p>Should the Secretary of State agree with the conclusion of Historic England that the development as proposed would cause substantial harm to the significance of the Stow Park Medieval Bishops Place and Deer Park we urge that the scheme is only consented if amended to delete those panels lying within the areas indicated comprising array areas P2, P3, P6, P5 (part of), Q24, Q25, Q26 and Q27 on the plan of the medieval deer park agreed between Historic England and The Applicant (dated 05/04/2024). We request that the applicant is asked to prepare alternative detailing of this part of the scheme sufficient to allow for a plan excluding the area identified on the agreed plan of Stow Park Medieval Bishops Place and Deer Park to identified in an updated DCO rather than as presently submitted. The deletion of the solar panel arrays set out above would mitigate the substantial harm otherwise caused to the significance of the monument.</p> <p>The site-specific substantial harm to the significance Stow Park Medieval Bishops Place and Deer Park is not necessary to the general public benefit of renewable</p>	<p>The Applicant respectfully disagrees with Historic England that the Scheme would cause substantial harm to the significance of the Medieval bishop's Palace and Deer Park, Stow Park (NHLE 1019229), and as such does not agree that the Scheme should only be consented if panels are removed from areas within the historic boundary of the deer park.</p> <p>The Applicant refers to <b>Stow Park Cultural Heritage Position Statement [REP5-027]</b>, which details the Applicant's justification for their conclusion that the level of harm is less than substantial, as well as the policy tests that are relevant to the DCO application and the proposed development within the former Stow Park deer park area.</p>

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			<p>that 'substantial harm to or loss of designated assets of the highest significance, including Scheduled Monuments.....should be wholly exceptional'.</p> <p>Additionally, noting the Applicants conclusions that there would be less than substantial harm at the upper end of the spectrum, should the Secretary of State accept this position, the Applicant is asked clearly set out how the suggested public benefits would outweigh that harm.</p>	<p>energy nor is it would appear essential to the operation of the majority of the remaining parts of this scheme (given its modular design).</p> <p>As set out on EN 01 2023 5.9.28 <i>Substantial harm to or loss of significance of assets of the highest significance, including Scheduled Monuments; Protected Wreck Sites; Registered Battlefields; grade I and II* Listed Buildings; grade I and II* Registered Parks and Gardens; and World Heritage Sites, should be wholly exceptional.</i></p> <p>The tests for allowing substantial harm under EN 01 2023 – 5.9.29 are not met viz. <i>Where the proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset the Secretary of State should refuse consent unless it can be demonstrated that the substantial harm to, or loss of, significance is necessary to achieve substantial public benefits that outweigh that harm or loss, or all the following apply:</i></p> <ul style="list-style-type: none"> <li>• <i>the nature of the heritage asset prevents all reasonable uses of the site</i></li> <li>• <i>no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation</i></li> <li>• <i>conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible</i></li> <li>• <i>the harm or loss is outweighed by the benefit of bringing the site back into use</i></li> </ul> <p>EN 1 2023 5.9.21 <i>The Secretary of State must also comply with the requirements on listed buildings, conservation areas and scheduled monuments, set out in Regulation 3 of the Infrastructure Planning (Decisions) Regulations 2010235.</i></p> <p><i>The Infrastructure Planning (Decisions) Regulations 2010</i></p> <p><b>7000</b> <i>(3) When deciding an application for development consent which affects or is likely to affect a scheduled monument or its setting, the decision-maker must have regard to the desirability of preserving the scheduled monument or its setting.</i></p> <p>The position was also set out NPS EN-1 2011</p> <p>5.9.25 When considering the impact of a proposed development on the significance of a designated heritage asset, the Secretary of State should give great weight to the asset's conservation. The more important the asset, the greater the weight should be. This is irrespective of whether any potential harm amounts to substantial harm, total loss, or less than substantial harm to its significance.</p> <p>5.9.26 The Secretary of State should give considerable importance and weight to the desirability of preserving all heritage assets. Any harm or loss of significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification.</p>	



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				<p>5.9.28 Substantial harm to or loss of significance of assets of the highest significance, including Scheduled Monuments; Protected Wreck Sites; Registered Battlefields; grade I and II* Listed Buildings; grade I and II* Registered Parks and Gardens; and World Heritage Sites, should be wholly exceptional.</p> <p>5.9.29 Where the proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset the Secretary of State should refuse consent unless it can be demonstrated that the substantial harm to, or loss of, significance is necessary to achieve substantial public benefits that outweigh that harm or loss, or all the following apply: • the nature of the heritage asset prevents all reasonable uses of the site</p> <p>no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation</p> <p>conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible</p> <p>the harm or loss is outweighed by the benefit of bringing the site back into use</p> <p>5.9.30 Where the proposed development will lead to less than substantial harm to the significance of the designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate securing its optimum viable use.</p>	
<b>2.8 Landscape and Visual</b>					
LAN-01	2.8.3	7000 Acres [REP5-051]	<p><b>Glint and Glare Assessment</b></p> <p>Looking at the assessment of effects on local road users, the Applicant has suggested, in response to concerns raised in the Local Impact Reports REP3-037] that 'traffic density of local roads is low and the speed at which traffic will be travelling is low. Therefore, a low magnitude of effects is predicted and detailed modelling is not required'.</p> <p>The Applicant is asked to please respond to the question of whether it is reasonable to exclude possible effects on the basis of low traffic volumes?</p>	<p>EN-3 paragraph 2.10.104 requires:</p> <p><i>"When a quantitative glint and glare assessment is necessary, applicants are expected to consider the geometric possibility of glint and glare affecting nearby receptors and provide an assessment of potential impact and impairment based on the angle and duration of incidence and the intensity of the reflection."</i></p> <p>EN-3 paragraph 2.10.158 requires:</p> <p><i>"Solar PV panels are designed to absorb, not reflect, irradiation. However, the Secretary of State should assess the potential impact of glint and glare on nearby homes, <b>motorists</b> [7000Acres emphasis], public rights of way, and aviation infrastructure (including aircraft departure and arrival flight paths)."</i></p> <p>As the Applicant has made no quantitative attempt to assess the intensity of the glare, then their claim that <i>"a low magnitude of effects is predicted and detailed modelling is not required"</i> cannot be justified. Furthermore, they have not complied with 2.10.158 that requires the potential impact on motorists to be assessed. EN-3 does exempt the minor roads which are the transport arteries of this region.</p>	<p>Reflections from solar panels will be of a similar intensity to reflective surfaces that road users come across in the natural environment, such as reflective facades, water-logged fields, puddles, and windows/greenhouses. Any solar reflections will also be fleeting in nature as the road user passes the Scheme.</p> <p>Any local roads will have far fewer road users travelling through them and already have fewer safety features such as road markings and signals, i.e. traffic lights.</p> <p>Traffic densities have a significant effect on the sensitivity of a road user because this has implications on their workload. A road user will require much greater level of concentration to safely travel along busy roads at high speeds, compared to the level of concentration required to safely travel along empty roads at slower speeds.</p> <p>Furthermore, the Scheme proposes vegetational screening surrounding the sites, which will further reduce visibility of any potential solar reflections.</p>

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				<p>In addition to vehicles, the local roads are used by walkers, cyclists and equestrians. No attempt has been made to assess the loss of amenity to these road users.</p> <p>Dismissing the need for modelling of the effect of glare on road users is consistent with the Applicant's shallow and incomplete approach in:</p> <ul style="list-style-type: none"> <li>• Only considering an observer height of 1.8m.</li> <li>• Assessing glare impact if it occurs for more than 60 minutes a day or 3 months per year; this is twice the value used in other projects, such as the Gate Burton and Longfield NSIPs.</li> <li>• Failing to assess the cumulative effects of glare.</li> <li>• Failing to assess the impact on all road users.</li> </ul>	<p>Due to the lowered safety risk towards local roads based upon the above reasoning, a low impact is predicted at worst for any user travelling along a local road surrounding the scheme. The full detail of the conclusions of the glint and glare assessment is set out in section 16.7 of Chapter 16 (Glint and Glare) of the Environmental Statement <b>[APP-054]</b>.</p> <p>In response to the questions on the approach:</p> <ul style="list-style-type: none"> <li>• Ground floor and first floor observer heights are considered within the assessment; 1.8m is only used for modelling purposes. This height is chosen to represent a typical observer on the ground floor of a property. Small changes to this height, such as 0.5m, will not have an impact on the overall conclusions of the report.</li> <li>• To quantify and determine where a significant impact is expected, previous glint and glare assessment experience has been drawn upon as well as a review of existing guidance. These include previous glint and glare assessment experience, and shadow flicker guidance for wind turbines. Pager Power has worked on multiple NSIP solar schemes in which this methodology has been accepted.</li> <li>• Cumulative impacts have been assessed within Section 8 of <b>WB6.3.16.1 ES Appendix 16.1 Solar Photovoltaic Glint and Glare Study [APP-132]</b>.</li> <li>• All roads surrounding the development have been considered in Sections 5.3, 6.4 and 7.2 of <b>WB6.3.16.1 ES Appendix 16.1 Solar Photovoltaic Glint and Glare Study [APP-132]</b>.</li> </ul>
<b>2.9 Need, the electricity generated and climate change</b>					
ENE-01	2.9.1	7000 Acres <b>[REP5-051]</b>	<p><b>Cumulative climate change effects</b></p> <p>Appendix E of the Joint Report on Interrelationships with other NSIPs <b>[REP4-059]</b> refers to the professional judgements made on the cumulative effect on climate change. The Applicant is asked to please explain why it is possible to assess</p>	<p>This question is answered in two parts:</p> <p>i) General weaknesses within the Joint Report on Interrelationships with other NSIPs</p> <p>The Joint Report on Interrelationships with other NSIPs considers the details of communication, co-ordination and collaboration between the Applicants of four schemes, Gate Burton, Cottam, West Burton and Tillbridge.</p>	<p>The <b>Joint Interrelationship Report [EX6/WB8.1.9_D]</b> is limited to inclusion of Gate Burton Energy Park <b>[EN010131]</b>, Cottam Solar Project <b>[EN010133]</b>, West Burton Solar Project <b>[EN010132]</b> and Tillbridge Solar <b>[EN010142]</b> due to their geographic and temporal similarity, and due to their co-ordinated approach to a Shared Cable Route crossing the River Trent between Marton (Lincolnshire) and Coates (Nottinghamshire).</p>

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			<p>cumulative effects on Climate Change given the national rather than local scale of the impact.</p>	<p>The report elects to exclude Steeple Renewables Project on the basis that information is not sufficiently well developed to be considered. However, it would be simple to include the boundaries on the outline map as a minimum and, given the knowledge and experience of 4 other schemes, it would be reasonable to make baseline assumptions to enable Steeple Renewables to be included in the report, albeit with a reduced level of detail in certain areas. The omission of Steeple Renewables is a clear shortfall in the report and provides a further example of a missed opportunity by the Applicants to communicate transparently about the widespread scale of development in the region.</p> <p>Appendix E is titled "Review of Cumulative Effects", and considers the information made available for the Gate Burton, Cottam, West Burton and Tillbridge schemes. It is worth noting that within this review, there are frequently differences between the conclusions made by developers in their assessments. Such conclusions can vary significantly, e.g. ranging from "no significant effects" to "moderate or large adverse effects", and vary across many areas of consideration, e.g. Climate Change, Ecology, LVIA, Socio-Economics, Human Health and Waste. This clearly demonstrates the subjective nature of such assessments, based upon pseudo-methodologies and the reliance on "professional judgment".</p> <p>The report identifies differences in methodology as being a potential reason for the differences, citing the example of the use of different impact areas by the Applicants, but the report does not provide any details to justify this position across so many areas of consideration.</p> <p>There is no attempt to pool expertise and findings, no critique of which methodologies or approaches may yield a more effective assessment of the cumulative impacts. The review therefore does not improve the understanding of cumulative impacts, therefore the treatment of the subject is superficial and inadequate.</p> <p>The report concludes that despite such a range of assessments by different developers, it has "not deemed these outcomes are in conflict with one another". Again, the report provides little evidence upon which to base this assertion and fails to explain in detail the underlying reasons for such differences.</p> <p>Overall, while the report describes how the Applicants communicate, co-ordinate actions and collaborate, it falls short of being a thorough consideration of cumulative effects and is therefore an inadequate basis for evidence and should be given little weight.</p> <p>For there to be a meaningful assessment of the cumulative effects, 7000Acres call for an independent consideration of the proposed developments to study the cumulative impacts of all the solar developments within the area (including</p>	<p>Steeple Renewables Project <b>[EN010163]</b> has not been included in the <b>JIR [EX6/WB8.1.9_D]</b> as the JIR only considers the four specified projects as this was specifically requested by the Examining Authority in the Gate Burton Energy Pary examination. In terms of the assessment of cumulative effects generally, limited information is available about the Steeples Renewables Project. There is no Scoping Report, Preliminary Environmental Information Report and Environmental Statement available. As such, it is not possible to carry out a meaningful environmental assessment of the cumulative effects between the projects because of the lack of design and environmental information available.. Furthermore, Steeple Renewables Project is more than 1 year behind the other NSIPs with respect to progress on making its DCO Application, and as such, limited information is available in comparison to the NSIPs included in the <b>JIR [EX6/WB8.1.9_D]</b>.</p> <p>The Applicant's approach to the cumulative assessment methodology is set out in paragraphs 2.5.3 to 2.5.15 in <b>ES Chapter 2 EIA Process and Methodology [APP-040]</b>. With respect to differences in assessment outcomes across each of the four NSIPs included in the <b>JIR [EX6/WB8.1.9_D]</b>, each independent assessment has included the use of professional judgement in reaching its conclusions. There is no requirement for one scheme's cumulative assessment to "interpret" or "address" any other schemes, in either the EIA Regulations or PINS Advice Note 17.</p> <p>Appendix E of the updated <b>JIR [EX6/WB8.1.9_D]</b> summarises the respective findings of these independent assessments. The Environmental Impact Assessments for each of the schemes have been undertaken independently, and different impact assessments can reach different conclusions, as professional opinion can lead to varying judgements . The difference in the conclusions on cumulative effects is covered in the <b>JIR [EX6/WB8.1.9_D]</b> and is therefore based on expert specific methodologies which reach conclusions that are unique to each topic.</p>

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				<p>Steeple Renewables), rather than a desktop review of the submission material by the Applicants themselves.</p> <p>ii) Implications of approach on National v Local assessment of Climate Change effects.</p> <p>With regard to the specific detail of whether Climate Change can be assessed on a national versus local level, it is unclear from the report how such a vastly different interpretation between the Gate Burton/Tillbridge and Cottam/West Burton schemes can be meaningfully explained. It would seem that Cottam/West Burton have assessed some "more local" interpretation benefit as having a "major cumulative beneficial effect", yet none of the material provided by the Applicants have considered Climate Change impacts sufficiently broadly, e.g. omitting the net CO2 impact of displacing food and energy crops, or the impact of committing of land to solar ahead of, and in competition with other decarbonisation needs. In addition, given all the schemes would connect directly to the national grid, the power will be consumed some distance from the solar panels and there will be no local benefit to the villages or towns in the immediate area where the energy would be produced.</p> <p>Given the scheme is being assessed as a "Nationally Significant" infrastructure project, it would seem anomalous to give any weight to a Climate Change impacts as being significantly beneficial on a local level, particularly when two schemes have concluded that at a national level "no significant cumulative effects are identified".</p> <p>To argue that the existence of multiple schemes has an accelerating effect on decarbonisation is to assume that there are no other alternative or competing routes to solar deployment. 7000Acres have already highlighted the potential for rooftop solar that continues to be spurned every day, with every new commercial and domestic building constructed, and cited Germany as a clear example of what can be delivered on rooftops, often much more quickly than by having embarked on super-sized NSIP-scale ground mounted solar schemes.</p>	<p>The effect of cumulative schemes has been considered within the specific context of the inter-relationship of the multiple proposed NSIP solar projects. As each of these developments, in isolation, has concluded that there would be a beneficial effect on climate change, a cumulative beneficial effect was identified. It is considered that this aligns with best practice Institute of Environmental Management (IEMA) guidance 'Assessing Greenhouse Gas Emissions and Evaluating their Significance (2<sup>nd</sup> Edition), which states <i>"The contextualisation of GHG emissions, as discussed in Section 6.4, should incorporate by its nature the cumulative contributions of other GHG sources which make up that context"</i>.</p> <p>Based on the above, a conclusion on the cumulative effect of schemes on climate change was included within the assessment of Climate Change. It is recognised that a more conservative approach has been taken by Gate Burton and Tillbridge and no additional cumulative beneficial effects have been identified as a result of their interpretation of the Guidance. That interpretation considers that 'cumulative effects' are not possible to assess for climate change given the national, rather than local, scale of the impact.</p> <p>In light of this difference in interpretation, the SoS may decide to place limited weight on the beneficial cumulative effects identified by the Applicant (albeit, each Scheme has identified beneficial effects for each Scheme, assessed individually). Discussion between the different authors of the Climate Change Assessments for the projects has taken place to understand the approach taken in each environmental statement.</p> <p>Regarding the comments on alternatives to utility solar, <b>The Applicant's Written Summary of Oral Submissions &amp; Responses at Issue Specific Hearing 1 and Responses to Action Points [REP1-052]</b> describes, at page 12 that <i>"the Applicant agrees that rooftop solar is desirable and should be deployed, but that this must be in addition to ground mounted large scale solar, as it is not a viable</i></p>

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					<p><i>alternative</i>" for reasons described in Section 7.6 of the <b>Statement of Need [APP-320]</b>.</p> <p>Please also see the Applicant's response to ENE-02 below.</p>
ENE-02	2.9.2	7000 Acres <b>[REP5-051]</b>	<p><b>Electricity Generation</b></p> <p>Interested parties have challenged the rationale for the use of the grid connection at the West Burton 400kV substation for this solar project in terms of its electricity generating capacity (see, for example <b>REP4-116</b>), with the suggestion that such valuable high-capacity Grid connections need to be used effectively. The Applicant is asked to please respond to this point with reference to relevant policy provisions.</p>	<p>Valuable high-capacity Grid connections need to be used effectively</p> <p>The Applicant has not challenged the explanation set out by 7000Acres, that solar panels generate electricity at low voltages, and there is no inherent need for solar to be connected using high voltage grid connections. Nor has the Applicant challenged the statement that deployment on rooftops needs no grid-scale infrastructure adjustments, and typically needs little or no adjustments to local distribution networks and therefore takes pressure off National Grid's queue for transmission connections.</p> <p>It is therefore a statement of fact that connection at a high voltage substation is not essential for the deployment of solar or to meet the UK Government's 70GW ambition.</p> <p>Indeed, the deployment of large-scale solar schemes in the way that has been proposed by the Applicant and others, would sterilise strategically important grid connection points. To decarbonise, it is understood that the country will need equipment such as nuclear reactors (including small modular reactors) and electrolysers at GW scale. These installations will require high voltage, high power grid connections, and the use of such connections for solar schemes will sterilise connections for decades. The consequence of this will be the need for yet more grid infrastructure, and / or a delay of such technology being deployed.</p> <p>The foreseeable consequence of this is to divert already scarce resources that are vital for higher priority decarbonisation efforts. There are already shortages of skilled engineering staff, transformers and high voltage equipment. With the key priority being identified being the need to deploy the grid infrastructure to support offshore wind, the unnecessary connection of solar to HV substations, miles from the panels, puts additional pressure on this supply and skills chain (see Recommendations 14 &amp; 15 from the Electricity Commissioner's Report).</p> <p>National Grid's struggles with the volume of grid connections it is facing is well documented. The UK electricity regulator, Ofgem, wrote to both companies within National Grid (Electricity System Operator, ESO and Electricity Transmission ET) in March 2023, allowing longer durations for the provision of connection offers, in an attempt to improve the actual connection dates for the majority of connecting parties. More recently, in February 2024, Ofgem have granted National Grid a further 3-month extension across all projects, citing an "unprecedented volume of applications" for connections, which implies a scale of network reinforcement that is "more than will be recommended in NGENO's network plan for Great Britain's electricity transmission system out to 2035". To</p>	<p>Section 8.5 of <b>Statement of Need [APP-320]</b> clearly sets out the merits of connecting generation to the National Electricity Transmission System as opposed to connecting to the distribution systems (including 'behind the meter' on consumer roofs). Para 8.5.3 notes that distribution networks operate at lower voltages and can therefore accommodate smaller capacity generators. Para 8.5.7 describes that the distribution networks were not designed to connect significant generation capacities. The National Infrastructure Commission's Call for Evidence of Feb 2024 (<a href="https://nic.org.uk/app/uploads/NIC-Electricity-distribution-networks-study-Call-for-evidence.pdf">https://nic.org.uk/app/uploads/NIC-Electricity-distribution-networks-study-Call-for-evidence.pdf</a>) describes the likely need to invest to increase capacities. The Ofgem / DESNZ Connections Action Plan of November 2023 is also relevant to this point. It does not therefore follow that "<i>deployment on rooftops needs no grid-scale infrastructure adjustments, and typically needs little or no adjustments to local distribution networks and therefore takes pressure off National Grid's queue for transmission connections</i>".</p> <p>Section 8.6 of <b>Statement of Need [APP-320]</b> provides additional evidence to the transparency benefits of larger scale generation due to the market rules under which the asset must be operated. This is a key benefit of large-scale transmission connected systems over rooftop systems which cannot be understated. The Scheme will not 'sterilise' the West Burton connection, but instead will make use of the existing and available grid connection at West Burton to bring forwards urgently needed low carbon infrastructure in support of Government's decarbonisation, energy security and affordability aims. Further, this is because there are no low-carbon technologies currently available and suitable for deployment and connection at West Burton in timelines comparable with the Scheme, which would deliver more low-carbon electricity through the Scheme's grid connection than the Scheme itself is able. Due to the significant challenge ahead to deliver a decarbonised electricity system by 2035, sterilising connections by</p>

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				<p>effectively decarbonise, the UK will need to transform its electricity network to deliver offshore wind connections as a key priority. It is essential that unnecessary schemes, such as that proposed for West Burton, are not allowed to add to the congestion and scale of challenge faced by National Grid.</p> <p>The case put forward by the Applicant is that their scheme is essential requirement to decarbonise and to achieve 70GW of installed capacity, but this is not borne out by the evidence provided by UK Warehouse Association and Ecotricity, which demonstrate the potential scale of rooftop solar in the UK, or the experience of Germany (7000Acres answer to ExA's First Written Questions, Q1 1.9.4), which has already installed 80GW of solar capacity, without a single scheme of the size proposed by the Applicant for West Burton.</p>	<p>keeping connections 'vacant' in the hope that in the future other technologies will come forwards to 'save the day' is not a prudent approach to delivering decarbonisation and is not consistent with government's strategy.</p> <p>The Scheme holds an offer from National Grid to connect at West Burton in 2028, providing decarbonisation and security of supply benefits to the UK in the critical 2020s.</p>
ENE-03	2.9.3	Lincolnshire County Council (LCC) <b>[REP5-042]</b>	<p><b>Panel Replacement</b></p> <p>Concerns are expressed by a number of parties relating to the Applicants reference to an assumed replacement rate of 0.4% of panels per year, as set out in ES Chapter 7 Climate Change <b>[APP-045]</b>. Paragraph 7.8.52 sets out that this figure is based on 'supplier input' and has been applied to the estimated 40 year life of the development. With reference to this information:</p> <p>a. The Applicant is Invited to set out further details of the assumptions on which this figure is based;</p> <p>b. Set evidence to justify the application of the 0.4% replacement rate as a linear rate over 60 years;</p> <p>c. Other parties are invited to provide alternative evidence to suggest that this approach is not credible.</p>	<i>[No response in submission]</i>	N/A
ENE-04	2.9.3	West Lindsey District Council (LCC) <b>[REP5-047]</b>	<p><b>Panel Replacement</b></p> <p>Concerns are expressed by a number of parties relating to the Applicants reference to an assumed replacement rate of 0.4% of panels per year, as set out in ES Chapter 7 Climate Change <b>[APP-045]</b>. Paragraph 7.8.52 sets out that this figure is based on 'supplier input' and has been applied to the estimated</p>	<p>WLDC have raised previous concerns regarding the implications of panel replacement due to failure rate and the likely environmental impacts that may occur (e.g. up to around 100ha being able to be replaced under the scope of 'maintenance' at any point in the operational timespan of the project).</p> <p>WLDC would be grateful for further explanation of how the assumptions are reached and will provide further comment following a review of such information.</p>	Please refer to the Applicant's response to question 2.9.3 in <b>WB8.1.34 The Applicant's Response to ExA's Second Written Questions [REP5-039]</b> .

Ref	ExA FWQ's	Respondent	Question	Response	Applicant's Comment
			<p>40 year life of the development. With reference to this information:</p> <p>a. The Applicant is Invited to set out further details of the assumptions on which this figure is based;</p> <p>b. Set evidence to justify the application of the 0.4% replacement rate as a linear rate over 60 years;</p> <p>c. Other parties are invited to provide alternative evidence to suggest that this approach is not credible.</p>		
ENE-05	2.9.3	7000 Acres [REP5-051]	<p><b>Panel Replacement</b></p> <p>Concerns are expressed by a number of parties relating to the Applicants reference to an assumed replacement rate of 0.4% of panels per year, as set out in ES Chapter 7 Climate Change [APP-045]. Paragraph 7.8.52 sets out that this figure is based on 'supplier input' and has been applied to the estimated 40 year life of the development. With reference to this information:</p> <p>a. The Applicant is Invited to set out further details of the assumptions on which this figure is based;</p> <p>b. Set evidence to justify the application of the 0.4% replacement rate as a linear rate over 60 years;</p> <p>c. Other parties are invited to provide alternative evidence to suggest that this approach is not credible.</p>	<p>The Applicant claims a 0.4% failure rate for their PV panels, without providing any evidence. This will result in 24% of the panels needing replacement within the 60-year life of the scheme and 60% of the panels lasting 100 years.</p> <p>The evidence submitted by the trade body, Solar Energy UK, to the House of Commons stated:</p> <p><i>"The lifespan of a new solar panels is also increasing. The typical operational lifespan of a new solar panel can now be 35 years or longer."</i></p> <p>Therefore, based on the solar industry's own evidence, a reasonable worst case is a 35 year life. Applying a 35 year life, the physical failure rate will be 100% before the original 40-year life of the scheme is reached. It is not a reasonable worst-case assumption that only 24% of the PV panels will need replacing over 60 years.</p> <p>In addition, the economic life of the PV panels must be considered as this will require PV panels to be replaced before their physical end of life is reached. The economic life of any asset is the period over which the expected revenue from operating the asset exceeds the expected operating costs incurred to earn that revenue. This additional replacement cycle is due to the degradation of PV panels, with electrical output declining over time. It is an historic assumption that the power output from PV panels degrades by circa 1% per year, so it will degrade by 60% at the end of the scheme's operational life, if in the highly unlikely event that the panels survive that long. Research using utility scale solar installations has shown that degradation is worse in real life than previously measured under laboratory conditions. The research identified real world degradation rates equal to <math>2.56 \pm 0.3\%</math>/year in June 2020, and for the subsequent years the degradation is <math>2.71 \pm 0.2\%</math>/ year and <math>3.32 \pm 0.3\%</math>/year, in June 2021 and 2022, respectively. This reduction in generating capability is in addition to the physical life of the PV panels.</p>	<p>An explanation of the 0.4% failure rate can be found submitted in answer to question 2.9.3 of Applicant's Responses to ExA Second Written Questions [REP5-039]. The response to question 1.9.10 of WB8.1.21 Applicant Response to First Written Questions [REP3-038] also addresses the point made regarding the economic lifetime of the panels.</p> <p>Chapter 10 of Statement of Need [APP-320] describes that solar power is economically efficient in the UK.</p> <p>Solar energy is generated at zero marginal cost, as defined in Para 10.2.1 of [APP-320], meaning that solar PV will enjoy a long operational life (as defined by 7000 Acres in their comment) and the Applicant does not agree with the statements made by 7000 Acres.</p> <p>The Applicant's Written Summary of Oral Submissions &amp; Responses at Issue Specific Hearing 1 and Responses to Action Points [REP1-052] describes, at page 39, National Grid's expectation that "peak demand will not be the only driver of system stress. It will be driven as much by peaks and troughs in electricity supply." Because prices increase at times of system stress, 7000 Acre's assertion that "daytime price per MWh will be significantly lower" is one view of how market price may out turn on one or more days, but clearly cannot be taken to be a general rule for future market prices of the operational lifetime of the project.</p> <p>Indeed, as described in Para 10.2.10 of Statement of Need [APP-320], "increasing the capacity of renewable assets in GB reduces the traded price of power" and this is</p>

Ref	ExA FWQ's	Respondent	Question	Response	Applicant's Comment
				<p>During the 15 year period covered by the Contract for Difference (CfD) financial support will be provided to the operator. Under the CfD Scheme<sup>23</sup> the Applicant will be paid an agreed strike price: the recent Contracts for Difference Allocation Round 5 resulted in a typical solar cost of £47 per MWh (CfD scheme prices are quoted in 2012 prices, with the latest indexation this is £64.56 per MWh). At the end of the CfD support, the operator will compete on the energy market on a fully commercial basis at a significantly lower daytime price per MWh, sometimes in summer a negative price due to curtailment. As solar power is generated only during daylight, with peak power produced in the middle of the day when demand is lower, PV panels will have to be replaced on a frequent basis in order to maintain economic levels of energy production. Failing to do so will result in a decreasing energy production/revenue but fixed costs. The Applicant has failed to take account of replacing PV panels on economic grounds in their ES. However, they have sought a very lax and wide-ranging definition of "maintain" in the DCO that will permit them to change panels at will. The combination of degradation and end of CfD subsidies is likely to result in an economic life of the solar assets of no longer than 20 years.</p> <p>In order to assess the true impact on transport, waste, noise, and GHG emissions, the Applicant should provide evidence regarding the true replacement cycle of the PV panels; failure to do this will render the SofS unable to assess the true impact of this scheme.</p>	<p>consistent with the Government's strategy to deliver an affordable, clean and secure energy system and will be to the benefit of consumers nationally.</p>
<b>2.10 Noise</b>					
NOI-01	2.10.2	7000 Acres [REP5-051]	<p><b>Noise and Other Limits</b></p> <p>7000 Acres suggest that the ExA should consider placing limits on Noise and other emissions, but give no indication as to what the figures for these limits should be. Please set out the limits that you would suggest would be appropriate and the reasoning to justify the figures you have provided.</p>	<p>The Noise Policy Statement for England (NPSE) defines :</p> <p>"NOEL – No Observed Effect Level – This is the level below which no effect can be detected. In simple terms, below this level, there is no detectable effect on health and quality of life due to noise;</p> <p>LOAEL – Lowest Observed Adverse Effect Level – This is the level above which adverse effects on health and quality of life can be detected;</p> <p>SOAEL – Significant Observed Adverse Effect Level – This is the level above which significant adverse effects on health and quality of life occur."</p> <p>As identified by WLDC in [REP1A-006], the Applicant has provided incomplete and contradictory information covering noise and vibrations. It has not established a clear baseline for noise and vibration measurements.</p> <p>In addition, the Applicant has not provided a reasonable worst case assessment of the amplitude and frequency range of noise and vibration emitted during construction, maintenance and operations of the scheme. Therefore, it is not possible to suggest appropriate limits as the Applicant has not provided the required information to which 7000Acres can respond.</p>	<p>The baseline noise survey and assessment methodology and results are set out in 6.2.15 ES Chapter 15 Noise and Vibration and follows all current policy and guidance [APP-053].</p> <p>Octave band data noise data has been used in all assessments where octave band data is available, including construction stage and operational stage assessments.</p> <p>Daytime and night-time assessments have been carried out, but limits on the noise levels in accordance with BS4142 have been applied to our assessment. The BS4142 limits are in line with NOEAL Guidance at a minimum.</p> <p>The local authority have not requested that ecological receptors are included in the noise assessment, however the baseline noise survey and assessments using that data include the current environment that the ecological receptors are in.</p>



Ref	ExA FWQ's	Respondent	Question	Response	Applicant's Comment
				<p>NPSE states that it is not possible to identify a single objective noise based measure that defines LOAEL and SOAEL that is applicable to all sources of noise in all situations.</p> <p>The Applicant must provide the missing information and clarity requested by WLDC in [REP1A-006] before any limits can be identified. It is likely that a range of limits will be required depending on the frequency of the noise or vibration and the time of day.</p> <p>The ExA is requested to take note of the aims in the NPSE:</p> <p><i>"The first aim of the Noise Policy Statement for England: Avoid significant adverse impacts on health and quality of life from environmental, neighbour and neighbourhood noise within the context of Government policy on sustainable development.</i></p> <p><i>The second aim of the Noise Policy Statement for England: Mitigate and minimise adverse impacts on health and quality of life from environmental, neighbour and neighbourhood noise within the context of Government policy on sustainable development.</i></p> <p><i>The third aim of the Noise Policy Statement for England: Where possible, contribute to the improvement of health and quality of life through the effective management and control of environmental, neighbour and neighbourhood noise within the context of Government policy on sustainable development."</i></p> <p>As maintaining and improving health and the quality of life are key components of the NPSE, applicable noise limits should be set to LOEAL to minimise any adverse effects. An increasing level of adverse effects would occur between LOEAL and SOEAL, so not minimising the adverse effects. Setting the noise limits to LOEAL would be consistent with the first aim, which is to avoid significant adverse effects, which would occur at SOEAL.</p> <p>In addition, it has been noted that the Applicant's noise assessment does not take account of the hearing range of protected species, including bats (20 kHz – 108 kHz) and owls, that could be impacted by noise generated by WBSS.</p>	
NOI-02	2.10.3	7000 Acres [REP5-051]	<p><b>Process and Methodology</b></p> <p>ES Chapter 2: EIA Process and Methodology [APP-040] states, at Paragraph 2.4.18:</p> <p><i>"Following the classification of an effect, clear statements will be made within the topic chapters as to whether that effect is significant or not significant. As a rule, major and moderate effects are generally considered to be significant, whilst minor and negligible effects are considered to be not significant. However,</i></p>	<p>Noise and its impact on human health should be dealt with under the aegis of a HIA as it has multiple implications, including on mental health for receptors choosing to live in a quiet rural area.</p> <p>In the opinion of 7000Acres, it is reasonable that the threshold for moderate magnitude should be set to LOAEL, i.e. the level at which adverse effects on health and quality of life commence.</p> <p>If moderate magnitude is set at the SOEL level then a significant adverse impact on health will not be avoided.</p>	<p>The potential effects from noise can only be assessed in accordance with current guidance and standards, which at the time of writing do not include assessments for the impact on mental health of local residents as part of the noise assessment.</p> <p>The assessments in 6.2.15 ES Chapter 15 Noise and Vibration [APP-053] show that some effects will have a moderate/minor effect, and as shown in the significance of effect matrix, moderate/minor is not the same as</p>

Ref	ExA FWQ's	Respondent	Question	Response	Applicant's Comment
			<p><i>professional judgement will be applied, including taking account of whether the effect is permanent or temporary, its duration / frequency, whether it is reversible, and / or its likelihood of occurrence. "</i></p> <p>Please confirm what professional judgment is applied in not considering moderate as a significant effect and why the moderate magnitude has been defined as the Significant Observed Adverse Effect Level.</p> <p>If the ExA and the Secretary of State decided that moderate effects are significant, how would this alter the findings of ES Ch15 : Noise and Vibration <b>APP-053</b> ? Please explain your answer.</p>		<p>moderate. Moderate/minor is not significant for the purposes of the EIA Regulations 2017.</p> <p>Human health (including mental health and wellbeing) impacts as a result of noise are instead assessed in Section 21.5 of <b>6.2.21 Environmental Statement - Chapter 21 Other Environmental Matters [APP-059]</b> and <b>WB8.4.21.1 Environmental Statement - ES Addendum 21.1: Human Health and Wellbeing Effects [REP4-077]</b>. As no significant noise and vibration effects are anticipated, the assessment finds no significant health and wellbeing impacts as a result (see para. 3.5.8-3.5.9 <b>[REP4-077]</b>).</p>
NOI-03	2.10.4	West Lindsey District Council (LCC) <b>[REP5-047]</b>	<p><b>WLDC Methodological Concerns</b></p> <p>The Applicant has responded to the WLDC's comments in its LIR on the noise methodology, surveys, sources and assumptions. WLDC's concerns on the noise assessment methodology are set out in section 14 of its LIR <b>[REP1A-006]</b>. This was discussed at ISH4 <b>[EV-029]</b>.</p> <p>The Applicant's Written Summary of the Applicant's Oral Submissions at Issue Specific Hearing 4 and Responses to Action Points <b>[REP4-071]</b> confirms that details have been requested from WLDC of any additional wording they would like to be included in the management plans relating to noise issues.</p> <p>Please provide an update on progress. Has this addressed the Council's concerns?</p>	<p>The noise assessment methodology issues have largely been addressed through the exchange of information.</p> <p>Confirmation will be provided within the SoCG.</p>	<p>The Applicant notes this comment, please refer to the <b>West Lindsey District Council Statement of Common Ground [EX6/WB8.3.2_B]</b>.</p>
<b>2.11 Other planning matters</b>					
OPM-01	2.11.1	Lincolnshire County Council (LCC) <b>[REP5-042]</b>	<p><b>Waste (Cross Reference Question 2.1.4)</b></p> <p>LCC's response to First Written Questions states that it is reasonable to ask the applicant to clarify how much waste they anticipate at what points in the scheme and</p>	<p>The extension to 60 years makes it even more difficult to forecast waste arisings and capacity that far ahead, it makes it all the more important that the Applicant produces, and keeps updated, a Waste Management Strategy showing predicted arisings and proposed management.</p>	<p>Please refer to the Applicant's response to questions 2.1.4 and 2.3.7 in <b>WB8.1.34 The Applicant's Response to ExA's Second Written Questions [REP5-039]</b>.</p>

Ref	ExA FWQ's	Respondent	Question	Response	Applicant's Comment
			<p>how they propose to manage it. It suggests that "provision needs to be made sooner rather than later to ensure we do not end up with a situation of a 'solar panel mountain' as was the case with the 'fridge mountain' some 15 years ago".</p> <p>Noting that Question 2.1.4 relates to the extension of time from 40 to 60 years and the cumulative impacts from this, Please can the Applicant and other Ips respond, and update on, progress specifically on waste management matters and the management of this.</p>	<p>Also, the Applicant should clarify how this timescale ties in with the lifetime of the on-site equipment.</p>	
<b>2.12 Safety and Major Incidents</b>					
SMI-01	2.12.3	Lincolnshire County Council (LCC) [REP5-042]	<p><b>Accidents, Disasters and Health Impacts of BESS</b></p> <p>LCC refers in its LIR [REP1A-002] to the impacts associated with matters relating to accidents and disasters, and health to be neutral. LCC confirmed that this is on the assumption that a financial contribution will be secured through an appropriate mechanism (PP) to enable the necessary inspection of the BESS to confirm the required safety measures and means for dealing with a thermal outbreak are in place and in working order which would minimise the risk of a thermal outbreak within the BESS to an acceptable level. Please provide an update on the assumption and whether or not measures to secure the necessary mitigation appear to be satisfactory</p>	<p>At this stage with the information currently available it is confirmed that the mitigation is satisfactory. This is caveated on the basis that if consent is granted a detailed battery safety plan will need to be prepared and approved by LCC based on the available BESS technology at that time and that the applicant commits to a full inspection regime in the first year of operation and subsequent annual inspection of the BESS and necessary mitigation for the lifetime of the development.</p>	<p>Requirement 6 to Schedule 2 of <b>3.1_G Draft Development Consent Order Revision G [EX6/WB3.1_G]</b> secures the need for a Battery Storage Safety Management Plan.</p>
<b>2.13 Socio-economics Matters</b>					
STR-01	2.13.1	West Lindsey District Council (LCC) [REP5-047]	<p><b>Skills Supply Chain and Employment Plan</b></p> <p>During ISH4 [EV-029], the Applicant made a number of comments about updating the outline Skills Supply Chain and Employment Plan (oSSCEP). This was originally referenced as [APP-319]. At Deadline 4 a revised</p>	<p>WLDC has no further comments to make on the outline Skills, Supply Chain and Employment Plan.</p>	<p>The Applicant notes this comment.</p>

Ref	ExA FWQ's	Respondent	Question	Response	Applicant's Comment
			(Revision A) version was submitted [REP4-050]. Please can Ips comment on the revision, particularly regarding the relationship with the Organisational Framework, monitoring, consultation and involvement of host authorities.		
STR-02	2.13.3	7000 Acres [REP5-051]	<p><b>Local Economic Impacts –</b></p> <p>LIS During ISH4 [EV-029], the Applicant and WLDC made references to the Local Industrial Strategy (LIS). Various Ips have raised concerns that the LIS is not considered at all in the Planning Statement, and felt that extensive large-scale solar would undermine regional objectives for the agrifood and visitor sectors. The ExA notes that Revision B (Appendix D) of the Planning Statement does cross refer the Greater Lincolnshire LIS [REP4-048].</p> <p>Ips are invited to provide an update on the alignment of the project with the LIS.</p>	<p>The Applicant's response focuses on the temporary employment benefits during the construction phase of the project and fails to address the potential for long-term adverse impacts of the development on the agricultural supply chain, agri-food, visitor economy, accommodation and food services.</p> <p>With regard to employment, the Applicant highlights the benefits of their scheme in having a positive impact in the renewable energy sector. Looking more widely, the region will have lost a significant volume of jobs in energy sector as a whole, with the closure of Cottam and West Burton coal-fired power stations, and the benefit highlighted by the Applicant arising from roles during construction will only be temporary. The Applicant argues that the scheme provides valuable "diversification" by offering roles outside of agriculture and tourism, however both of these are areas of key growth within the LIS. It is therefore disingenuous of the Applicant to comment on the Policy with regard to employment, highlighting the potential for "diversification", without acknowledging their own assessment that there will be a decrease in employment within the region through the operational life of the scheme, in an area which already faces significant deprivation and limited opportunities.</p> <p>The Applicant considers the use of land necessary owing to the scale of capacity required, however solar can be deployed in a disaggregated mannerr, in much smaller capacities, e.g. on rooftops, and make the same energy contribution. It is only the choice of the developer to occupy a high-voltage, high power grid connection and size solar capacity accordingly that has driven the use of land.</p> <p>Overall, therefore, there appears to be very little alignment between the proposed development and the LIS.</p>	<p>The Applicant refers to Agenda item 5c of <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>, which sets out where in the documentation the LIS has been considered.</p> <p>The Applicant has referred to but not assessed the LIS in the <b>Planning Statement [EX6/WB7.5_C]</b> as it is a strategic document forming part of the evidence base for the Central Lincolnshire Local Plan (2023). As such, it is the Local Plan policies that the Planning Statement assesses.</p>
STR-03	2.13.4	Lincolnshire County Council (LCC) [REP5-042]	<p><b>Community Benefits</b></p> <p>LCC response to First Written questions 1.13.6 [REP3-042] refers to a variety of projects and community benefits. It notes that provision of community benefits is not a material consideration in determining renewable energy planning applications. WLDC [REP3-044] also states that the use of a community to 'compensate' affected persons is also not an appropriate mechanism to address such matters. Ips are</p>	<p>Whilst noting that community benefits is not a material consideration in the determination of the DCO it is a matter that both Councillors and local communities remain interested in.</p> <p>Whilst it was encouraging that the Council had early dialogue with the applicant at the start of the examination this has now paused and the Council has not be able to take these discussions further. What has been seen on other solar DCO schemes that despite commitment from applicants to continue the discussion following the closure of the examination this has not taken place and the Council fear that this will be the case with this project as well. So would welcome assurances from the applicant that the dialogue will continue post examination.</p>	<p>The Applicant notes this comment and seeks to assure LCC that it remains the Applicant's ambition to continue dialogue in relation to community benefits once the examination has closed on 8<sup>th</sup> May 2024.</p>

Ref	ExA FWQ's	Respondent	Question	Response	Applicant's Comment
			invited to comment further on such measures and provide any relevant updates on this aspect.		
STR-04	2.13.4	West Lindsey District Council (LCC) [REP5-047]	<b>Community Benefits</b> LCC response to First Written questions 1.13.6 [REP3-042] refers to a variety of projects and community benefits. It notes that provision of community benefits is not a material consideration in determining renewable energy planning applications. WLDC [REP3-044] also states that the use of a community to 'compensate' affected persons is also not an appropriate mechanism to address such matters. Ips are invited to comment further on such measures and provide any relevant updates on this aspect.	WLDCs position on this matter has not altered.	The Applicant notes this comment and seeks to assure WLDC that it remains the Applicant's ambition to continue dialogue in relation to community benefits once the examination has closed on 8 <sup>th</sup> May 2024.
STR-05	2.13.4	7000 Acres [REP5-051]	<b>Community Benefits</b> LCC response to First Written questions 1.13.6 [REP3-042] refers to a variety of projects and community benefits. It notes that provision of community benefits is not a material consideration in determining renewable energy planning applications. WLDC [REP3-044] also states that the use of a community to 'compensate' affected persons is also not an appropriate mechanism to address such matters. Ips are invited to comment further on such measures and provide any relevant updates on this aspect.	7000Acres agree with the points made by WLDC that a community fund or its use cannot be deemed an appropriate mechanism to address those impacted by the development or be any sort of valid mitigation. The concept of a community fund should therefore not be given any weight in the planning decision, particularly as there is no "mandate" for such a mechanism within the Order.  7000Acres 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 material produced by the Applicant .  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.	Please refer to the Applicant's response to questions 2.13.4 in <b>WB8.1.34 The Applicant's Response to ExA's Second Written Questions [REP5-039]</b> .  The Applicant seeks to assure 7000 Acres that it remains the Applicant's ambition to continue dialogue in relation to community benefits with the host authorities once the examination has closed on 8 <sup>th</sup> May 2024.
<b>2.14 Transport and access, highways and public rights of way (ProW)</b>					
TRA-01	2.14.2	Lincolnshire County Council (LCC) [REP5-042]	<b>Collision Data</b> In response to WQ1.14.9 (Collision Data), LCC states that <i>"the dDCO still seems to give too much power to applicant"</i> [REP3-042]. Please can LCC provide more specific details, and the Applicant may also wish to comment.	See response to Question 2.5.3 above	Please refer to the Applicants response to question 2.5.3 above in this document.

Ref	ExA FWQ's	Respondent	Question	Response	Applicant's Comment
TRA-02	2.14.4	West Lindsey District Council (LCC) <b>[REP5-047]</b>	<p><b>Joint Construction Traffic Management Plan</b></p> <p>The Outline Construction Traffic Management Plan <b>{REP4-038}</b> refers to a Joint Construction Traffic Management Plan at 7.2 (xxv) that such a document "could" be produced. This was discussed during ISH4 <b>[EV-029]</b>. The Applicant and Local Authorities should be progressing this element, including providing a form of wording to give confidence that congestion can be avoided at critical points where projects are being accessed or constructed simultaneously.</p> <p>Ips are requested to provide an update, including on views to the changes to the dDCO <b>[REP4-024]</b> in Requirement 2.</p>	<p>WLDC have provide a suggested framework for a commitment to a co-ordinated approach to managing construction traffic with other developments in the event two or more projects are constructed at concurrently.</p> <p>WLDC raises no further concerns beyond this matter.</p>	<p>The Applicant acknowledges receipt of the suggested framework for joint construction traffic management andis content the measures set out therein are consistent with the Applicant's commitments to Joint CTMP measures as set out at 7.2 point (xxv) of <b>WB6.3.14.2_C Environmental Statement Appendix 14.2: Construction Traffic Management Plan - Revision D [REP4-039]</b>.The Plan is secured by Requirement 15 of Schedule to the draft DCO <b>[EX6/WB3.1_G]</b>.</p>
<b>2.15 Water Environment including Flooding</b>					
No responses to questions received.					

### 3 Applicant's Responses to Deadline 5 Submissions

#### 3.1 Submissions by Host Planning Authorities

##### Lincolnshire County Council [REP5-041] and Nottinghamshire County Council [REP5-043]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
LCC/NCC-01	Cultural Heritage	Trent Valley Archaeology	<p><b>West Burton List of Actions</b></p> <p><i>NCC and LCC to provide further information and evidence on the area forming the Order Limits in terms of its relative sensitivity and archaeological significance.</i></p> <p>The Trent Valley flood plain has significant archaeology from the Palaeolithic period onward covering every period of human activity.</p> <p>Farndon Fields is an extremely rare Late Upper Palaeolithic open flint-knapping site on the Trent flood plain which is of international significance and it shows activity by humans when they are just a few kilometres from the glacier ice of the last Ice Age. You will not find Late Upper Palaeolithic sites by geophysical survey and desk based assessment alone and there are undoubtedly more such sites to be found along the Trent Valley flood plain.</p> <p>Recent evaluation work in the Trent Valley flood plain has identified previously unrecorded archaeology including Neolithic pits and flint tools and Bronze Age</p>	<p>The Applicant agrees that land within the Trent Valley has a potential to contain sensitive archaeology. The Applicant refers to the <b>Written Summary of the Applicant's Oral Submissions at the Issue Specific Hearing (ISH1) [REP1-055]</b>, whereby the Applicant detailed that for the Shared Cable Corridor Route which traverses land adjacent to the River Trent, the evaluation trial trenching targeted areas where archaeological remains had been identified, as well as a blanket sample of 'blank' areas. With both the Solar sites and the shared cable corridor the evaluation trial trenching demonstrated a high correlation with the results of the geophysical survey. No archaeological sites were identified solely by the evaluation trial trenching. So it was considered to verify the effectiveness of geophysical survey for identifying the presence / absence, as well as the extent of archaeological sites.</p> <p>The Applicant highlights the need for a flexible approach to evaluation trenching with consideration to baseline information and, where</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>burnt mounds which again were not identified through desk based assessment or geophysical survey.</p> <p>DN Riley's aerial photographic surveys in the 1970s identified a palimpsest of archaeological features of a range of dates either side of the Trent across the whole flood plain and into the terraces either side. The range of archaeology includes Iron Age square barrows not previously identified outside of Yorkshire, Roman villas and settlements, and Iron Age into Roman period brickwork-pattern field systems which survive above ground in nearby Sherwood Forest. When archaeological field evaluation is undertaken in this landscape far more archaeology has been found to be present.</p> <p>Roman settlements have been found on Tiln Farm solar park which were not identified by geophysics but were identified through trial trenching. We're getting an increasing understanding of the hierarchy of Roman settlement through the Trent Valley through a range of techniques, from air photos and geophysics to trenching and fieldwalking.</p> <p>The Order Limits sit within the Trent flood plain and is part of this complex and highly significant archaeological landscape. Archaeology is a finite resource and it is essential that currently surviving</p>	<p>available, the results of non-intrusive evaluation. The Applicant considers that the sample of evaluation trenching requested 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>The Applicant respectfully disagrees with the proposition that a site with different baseline conditions, such as Tiln Farm, whereby non-intrusive techniques were not reliable in identifying buried archaeological remains, should be considered adequate justification for a high sample of blanket trenching on a site where non-intrusive techniques, such as the Scheme, have been tested by evaluation trial trenching and proven to be reliable. The Applicant considers this to be in discord with national and local policy and guidance, please see the Applicant's Response to 2.7.1 of the ExA Second Written Questions <b>[REP5-039]</b>.</p>



Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			archaeology is identified and recorded in order to advance our understanding and provide public benefit.	
LCC/NCC-02	Cultural Heritage	Archaeological Evaluation	<p><i>LCC and NCC to provide specific comments in relation to:</i></p> <p><i>a. If the Secretary of State were to agree that sufficient pre-consent archaeological evaluation has taken place, how their other concerns could be addressed through specific amendments to the Applicant's WSI.</i></p> <p><i>b. With reference to the need for future monitoring of impacts on the underlying archaeological resource, for example in relation to the comment regarding ground compaction from concrete shoes, the LPAs are asked to clarify what specific provisions are being sought within the Applicants management plans.</i></p> <p>A. There will need to be post-consent evaluation phases to cover the full Order Limits to inform appropriate levels of archaeological mitigation including preservation in situ, strip map and record and archaeological excavation proportional to the level of significance of the surviving archaeology as well as potential design changes to avoid preservation in situ areas and any nationally significant or equivalent sites.</p> <p>b. Preservation in situ areas must include mitigation measures to ensure the preservation in situ areas are protected from development works which could damage or destroy the surviving archaeology. There will</p>	<p>In the event that the Secretary of State is minded to agree with LCC and NCC that there is a requirement for further trenching to inform the mitigation measures or detailed design of the Scheme, the Applicant believes that such trenching can be undertaken post-determination of the DCO application, and in advance of the construction of the Scheme. A without prejudice archaeological WSI <b>[REP5-033]</b> has therefore been prepared that includes a programme of further 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>The Applicant reiterates that issue b 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. There are 10 areas within the main solar sites that</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>be significant ongoing constraints in the construction and decommissioning phases which will affect not only the number of solar panels but the development works themselves around the preservation in situ areas including plant activity and the placement of associated infrastructure such as compounds and access routes.</p> <p>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 will need an Archaeological Clerk of Works to ensure that any preservation in situ areas are monitored appropriately to ensure compliance, and the management strategy for the preservation in situ areas will need to be included in all management plans to ensure the protection measures stay in place throughout the development.</p>	<p>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 Scheme is not considered to cause a greater level of impact to that currently caused by plant movement associated with agricultural activity.</p>
LCC/NCC-03	Cultural Heritage	Trial Trenching	<p><i>Option C</i></p> <p>In the light of the WSIs produced by the Applicant we were asked by the Examining Authority to propose a third option.</p>	<p>The Applicant respectfully disagrees with LCC and considers that sufficient evaluation, proportionate to the stage at which the Scheme is at, has been undertaken to inform the DCO Application and any mitigation works required as part of the written</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>We recommend that the Applicant undertake the previously agreed 2% trenching with a 2% contingency across the remaining 79% of the Order Limits. The full final evaluation report will need to be produced in a timely fashion as the trenching results are required as baseline evidence to inform reasonable, proportionate and fit for purpose site-specific mitigation to be agreed across the Order Limits.</p>	<p>scheme of investigation (as set out in 6.3.13.7 Environmental Statement – Appendix 13.7 Archaeological Mitigation WSI (Written Scheme of Investigation) <b>[REP5-016]</b> as secured by Requirement 12 of Schedule 2 in <b>WB3.1_G Draft Development Consent Order Revision E [EN010132/EX6/WB3.1_G]</b>.</p> <p>In the event that the Secretary of State is minded to agree with LCC and NCC that there is a requirement for further trenching to inform the mitigation measures or detailed design of the Scheme, the Applicant believes that such trenching can be undertaken post-determination of the DCO application, and in advance of the construction of the Scheme. A without prejudice archaeological WSI <b>[REP5-033]</b> has therefore been prepared that includes a programme of further 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>

Lincolnshire County Council [REP5-040]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
LCC-01	ISH 5	Introduction	<p><b>POST HEARING SUBMISSIONS ON BEHALF OF LINCOLNSHIRE COUNTY COUNCIL AT DL5</b></p> <p><i>Introduction</i></p> <p>1. Lincolnshire County Council ("LCC") attended ISH 5 held virtually on Wednesday 13<sup>th</sup> March 2024. A summary of LCC's oral representations for the hearing is set out below. This document is limited to addressing matters where there was an element of disagreement at the ISH, all other matters on the agenda were either agreed or LCC had no comments to make.</p>	The Applicant notes this comment.
LCC-02	ISH 5	Hearing arrangements	<p><i>Purpose of the ISH</i></p> <p>2. Mr McBride on behalf of LCC set out its disagreement of the decision to hold this ISH virtually, drawing the Examining Authority attention to the Council's concerns and disappointment of this decision.. It seems to the Council that this is another example of the objective to progress the examination process quickly disregarding the opportunity for the host authorities and local communities to have the ability to hear the most critical topics of the examination in person choosing instead to use the much less desirable virtual format for the purposes of speed rather than quality examination of the issues.</p>	The Applicant refers to its Written Summary of the Applicant's Oral Submissions & Responses at Issue Specific Hearing 5 and Responses to Action Points <b>[REP5-037]</b> .

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>3. From the very early stages of the expansion of the number of pre-application NSIPs in Lincolnshire and in particular this geographical area the Council highlighted its concerns about the process of hearing these applications in an silo way initially to the Planning Inspectorate and subsequently to the Examining Authority for each of the applications that have reached examination stage.</p> <p>4. In the early stages of the dialogue with the Planning Inspectorate a meeting was held with case managers from the Planning Inspectorate, host authorities and the developers representatives. At this meeting the Council made it clear that given the unprecedented circumstances of the number of such applications in a small geographical area progressing at a similar timeline to examination that an innovative approach is necessary to examining the applications to ensure the cumulative impact of these application is looked at holistically.</p> <p>5. Sadly despite initial positive indications from the Planning Inspectorate and the Cottam Examining Authority about how this could be done as we approach the conclusion of the third of the examinations in practice little progress has been made to address the Council's concerns. The decision to hold the hearing today in a virtual way compounds the</p>	

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			<p>Council's view that the process seems to be all about speed rather than ensuring those most affected by the proposed development can at least be present whilst the most critical topics are examined in an open floor hearing rather than this less than desirable virtual way. To provide further evidence of this the recently commenced Viking Carbon Capture Storage Examination (26 March 2024) between Immingham and Theddlethorpe (Lincolnshire) included a suggestion by the ExA to hold hearings virtually – this was opposed by all the host authorities and the developer due to concerns about the ability for local communities to become engaged when hearings are held virtually.</p> <p>6. This examination heard at the preliminary meeting and other occasions from 7000 acres of the poor broadband connection in this area limiting the ability of their members and other local residents to hear and participate in a virtual hearing. In the view of the Council the decision to hold this hearing virtually gives the impression of the Examining Authority being dismissive about the consequences of a development of the scale and complexity involved that it cannot make the effort to hear the most critical parts of the examination in person. I am sure that is not the Examining Authorities intention but that is the</p>	

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			<p>perception it gives to the Council and local communities.</p> <p>7. The other examinations have seen different approaches with the Cottam examination only giving a very brief amount of time to landscape matters due to the time constraints of the venue. Again, I am sure this was not intentional to limit the amount of time given to this topic. However, this seems at odds to the Council with the commitment given by the Planning Inspectorate and the Cottam Examining Authority that whilst it is not possible to hold joint sessions with other Examining Authorities every effort should be taken to ensure cumulative issues are considered in detail during each examination. This has been sadly lacking in both this examination and by the ExA for Cottam consequently not giving the Council or local communities the confidence that those initial commitments of how the examinations will be heard has proved to be the case in reality. At the other end of the spectrum for one of the venues that was used for the Gate Burton hearings, which was slightly distant from affected local communities, the Planning Inspectorate required a minibus was available 3 times a day to be used for any residents who wished to be transported to the venue to view the proceedings. Yet for this ISH it was decided to hold the session virtually depriving the representatives of 7000 acres from</p>	

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			<p>participating due to poor connectivity in the area. This shows an unacceptable level of inconstancy denying those from local communities as well as some professionals who wished to participate today from being able to do so.</p> <p>8. In addition this Examining Authority may or may not be aware of the unprecedented number of NSIPs being promoted in Lincolnshire at various stages of progression which currently stands at 22. In recent weeks the County has been subject to the consultation of a new overhead transmission line and associated substations which will compromise of 140 km of overhead lines across Lincolnshire. The perception from Councillors and local communities is that Lincolnshire is being seen as a soft target for developers wishing to progress energy infrastructure developments.</p> <p>9. Whilst this may or may not be the case the Council considers that these communities and local residents deserve that every effort is made by those hearing the evidence for these applications to do so in appropriate forums so that if the decision is to grant consent than those communities can at least know that the evidence was heard and tested in the most appropriate way to give the confidence that the Secretary of State will</p>	



Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>have all the evidence in front of them to ensure the most appropriate decision is made.</p> <p>10. In summary it is the Councils view that the decision to hold today's Issue Specific Hearing virtually does not give the Council confidence that if consent is ultimately granted every opportunity has been given to those local communities wishing to test the evidence to the level they are entitled to. Communities facing the significant change in landscape and impacts resulting from the scale of development before this examination deserve at least for the examination to take place in a way that they can be part of so as to give them the confidence to accept the decision whatever that may be.</p>	
LCC-03	Cultural Heritage	Mitigation and Trenching	<p><i>Cultural Heritage</i></p> <p>11. Mr Adams, LCC's Senior Historic Environment Officer and Ms Allan Infrastructure Archaeologist attended ISH 5 and commented as follows:</p> <p>12. In their view, there needs to be enough evaluation to inform the mitigation strategy, currently there is insufficient baseline evidence for 4/5ths of the redline boundary due to insufficient trenching.</p> <p>13. The number and size of NSIPs in Lincolnshire and Nottinghamshire has grown very rapidly and as evaluation phases for NSIPs has progressed we do</p>	<p>The Applicant refers to its Written Summary of the Applicant's Oral Submissions &amp; Responses at Issue Specific Hearing 5 and Responses to Action Points <b>[REP5-037]</b>.</p> <p>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>

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			<p>agree that there has been insufficient trenching which risks setting a dangerous precedent. Curators across the country are on a steep learning curve regarding the extent of the impact across these schemes as the specific impacts across the redline boundary are not included in the submission documents. It's clear to us now that 1% or 2% trenching isn't sufficient to undertake an adequate assessment and this has informed the emerging regional guidance requiring 3 – 5% trenching.</p> <p>14. Evaluation trenches need to cover known and suspected areas of archaeology and also the so-called “blank” areas because trenching will reveal archaeology which has not been identified by other evaluation techniques, for example burials do not show up in geophysical survey, and in cropmarks later activity may mask earlier surviving archaeology. We call evaluation trenching ‘ground-truthing’ because it's the only way of confirming the nature, date and significance of the buried archaeological remains.</p> <p>15. In this landscape (for example for Cottam Solar Project) unexpected human remains were found and there was no indication of their presence from desk based information or geophysical survey results. The unexpected skeletons were serendipitously found as the trenching was targeting nearby features which</p>	<p>The Applicant agrees that due to superficial geological deposits as a result of the Heckington Fen Solar Park's location within the Fens, geophysical anomalies of an archaeological origin were masked by geological and pedological changes in the substrata. As such evaluation trial trenching identified buried remains that were not identified by geophysical survey. The Geological formations within Scheme are not comparable to Heckington Fen, and there is no evidence to suggest geology has masked archaeological features within the Scheme. As evidenced in <b>C8.2.6 Comparison of Archaeological Evaluation Investigations on Solar Schemes [REP4-001]</b> a trenching sample of 1.63% trenching was undertaken for Heckington Fen, which is noted by the Applicant to be less than that requested by LCC for the Scheme.</p> <p>The Applicant respectfully disagrees with LCC and considers that sufficient evaluation, proportionate to the stage at which the Scheme is at, has been undertaken to inform the DCO Application and any mitigation works required as part of the written</p>

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			<p>were unrelated. These Saxon skeletons were found in a very delicate state just 20cm below the ground surface and the shallow depth of these individuals means they would have been crushed and destroyed by piling, by ground anchors, by trenches dug for cables, or by the compaction of machines during the development groundworks if they had not been accidentally discovered. There will be confirmation bias when you're only looking at where you already know things are, if these trenches had not been dug these individuals would not have been discovered and they would have been destroyed.</p> <p>16. 79% of the redline boundary has not been evaluated by trenching and there will be as yet unknown surviving archaeology which will be damaged or destroyed by the development process. Archaeology not identified through evaluation trenching will be lost without mitigation, without recording, and without public benefit.</p> <p>17. Developmental impact includes piling for hundreds of thousands of spikes or piles, cable trenching, associated infrastructure and mitigation measures such as scrapes and wildlife ponds. There is potential for compaction during construction and decommissioning. Through the lifetime of the scheme</p>	<p>scheme of investigation (as set out in <b>6.3.13.7 Environmental Statement – Appendix 13.7 Archaeological Mitigation WSI (Written Scheme of Investigation) [REP5-016]</b> as secured by Requirement 12 of Schedule 2 in <b>3.1_G Draft Development Consent Order Revision G [EX6/WB3.1_G]</b>).</p>

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			<p>there will be refits which involve ripping out the old infrastructure and putting in new.</p> <p>18. In archaeological terms as a profession we are coming to realise that solar schemes are at least as damaging to archaeology as residential developments.</p> <p>19. Trenching fieldwork stopped in 2022 and we still don't have the final reports so we can't assess the significance of the archaeology which has so far been discovered. There was and still is time to undertake trenching across the redline boundary pre-determination to inform the ES and the site-specific mitigation strategy. Trenching is essential for mitigation, an example is Heckington Fen, a Lincolnshire NSIP where majority of archaeological mitigation areas were identified by the trenching results.</p> <p>20. In terms of project management and risk management the lack of investigation across almost 80% of the redline boundary defers a high level of risk to the developer in a post-consent situation of dealing with unexpected archaeology while the work programme has already commenced.</p>	
LCC-04	Landscape and Visual	Mitigation and Cumulative	<p><i>Landscape and visual</i></p> <p>21. Contrary to the Applicant's assessment, which identifies beneficial landscape effects on both</p>	The Applicant refers to its Written Summary of the Applicant's Oral Submissions & Responses at Issue

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>landscape character areas and individual contributors to landscape character, Mr Brown on behalf of LCC has assessed the project as resulting in adverse impacts on landscape character. The Applicants assessment does not provide appropriate justification for assessing several beneficial landscape effects that have been judged would occur through the construction and operation of a large solar development.</p> <p>22. Whilst establishing planting will add a positive element to this landscape and vegetation removal, as shown on the Hedgerow Removal Plans contained with Appendix C of the Outline Landscape and Ecological Management Plan, is relatively minimal, this is in the context of extensive change to land use over a large area, affecting the current sparsely settled and quiet agricultural character, which is currently unprecedented in the county in terms of scale. LCC has considered whether the secured mitigation balances out the change but concluded that the urbanising element in rural agricultural land is a definite, significant and adverse change. Mitigation planting goes some way to reduce this but the result is an adverse impact.</p> <p>23. It is possible to calibrate these judgements to some extent – Gate Burton shares landscape character areas, including Regional Scale LCT- 4a: Unwooded</p>	<p>Specific Hearing 5 and Responses to Action Points <b>[REP5-037]</b>.</p> <p>21. The West Burton Solar Project is considered to lead to adverse and neutral landscape effects during Construction and Year 1 phases of the Scheme, but by Year 15, following establishment of the proposed mitigation and landscape enhancement planting, effects on certain receptors are considered beneficial, but only ever at most, minor. No Significant (adverse or beneficial) In-Combination effects are identified. Please also refer to the Landscape and Visual Impact Assessment <b>[APP-046]</b>.</p> <p>Beneficial Landscape effects are derived from the significant amount of landscaping provided by the environmental masterplan. Across the West Burton Scheme, there would be approximately 7.1km of new native hedgerow will be planted, 13.7ha of woodland and over 900ha of various grassland types.</p> <p>This new landscaping has been designed to build upon and positively respond to the aims and management guidelines of the Regional and Local Landscape Character Assessments. For example, the planting of large blocks of woodland have been avoided, instead native woodland shelter</p>

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			<p>Vales and this applicant recorded no benefits to landscape receptors in their report. Another way to calibrate is that if someone was sent to undertake an assessment of this LCA, how would the project, if constructed, impact that assessment? In our view, the scheme and solar development would become a defining feature in that landscape and in the LCA. This speaks to the change and the adverse nature of the effect.</p> <p>24. Mr Brown outlined his concerns regarding cumulative landscape and visual effects: No residual adverse cumulative effects were identified within the applicants LVIA, and only a few adverse cumulative landscape effects were identified at the construction or operation (year 1) phases. Cumulatively, Mr Brown on behalf of LCC has assessed the project would bring about significant effects when assessed alongside the proposed Gate Burton, Cottam and Tillbridge Solar schemes. The mass and scale of these projects combined would lead to adverse effects on landscape character and visual amenity over an extensive area. The landscape character of the local, and potentially regional area, may be completely altered, particularly when experienced sequentially travelling through the landscape: creating perception of an 'energy landscape' as opposed to rural or agricultural one at present. These sequential effects would be</p>	<p>belts and individual trees have been utilised to support the existing character of this area. Where visible from within the wider landscape, the new planting would reinforce the well layered landscape with a backdrop of wooded vegetation in places on the horizon. Both new and existing vegetation would have established and begun to mature, creating a much stronger structure to the landscape locally, retaining and enhancing the overall character of the area.</p> <p>Adverse visual effects are typically associated with changes to the nature of views as a consequence of elements of the infrastructure being introduced into the view. Significant adverse effects generally occur where a receptor is within close proximity to the development allowing for direct views of the array or an overall appreciation of the array locally to the receptor.</p> <p>22. Mitigation measures are set out in The Outline Landscape and Ecological Management Plan <b>[EN010132/EX6/WB7.3_E]</b> (the 'OLEMP') and will be secured through Requirement 7 in Schedule 2 of 3.1 Draft Development Consent Order <b>[EN010132/EX6/WB3.1_G]</b>. This includes the</p>

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			<p>experienced by users of transport routes and PROW while through traveling through this landscape, where there is the potential to have frequent views of solar development, even if glimpsed, potentially over several kilometres of travel. While these views would not necessarily be from scenic routes or long distance or promoted PROW, the frequency and extent of views would undoubtedly increase the significance of effect.</p>	<p>planting of new trees with a total area of new woodland (approximately 13.7ha) proposed across the Scheme (para. 4.4.4). The OLEMP also focuses on the gapping up of currently defunct hedgerows, creation of new hedgerows (approximately 7.1km) at boundaries where none exist (para. 4.3.11). There will also be planting around Public Rights of Way and where landscape and visual impact mitigation is required. In addition, limited opportunities for the replanting of old, removed field boundaries (where appropriate) have been pursued, historic hedgerow on West Burton 1 has been identified using 1940s Ordnance survey maps and will be re-planted (para. 4.3.2).</p> <p>At Deadline 4 the Applicant updated Schedule 2 Requirement 9 in the WB3.1_E Draft Development Consent Order Revision E <b>[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 minim of 26.6% biodiversity net gain in river units. This must be submitted to and approved by the relevant planning authority.</p> <p>23. The assessments reported in the Environmental Statements for West Burton and</p>

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				<p>Gate Burton have been undertaken independently. Appendix E of the updated 8.1.9_B Joint Report on Interrelationships between Nationally Significant Infrastructure Projects Revision B [<b>REP4-060</b>] summarises the respective findings.</p> <p>It is important to note that the site for the Gate Burton Energy Park is located within the Laughton Wood Area of Great Landscape Value (AGLV), which undoubtedly raises the inherent value of the receiving landscape, and thereby resulting in a higher significance of landscape effect associated with the proposed Gate Burton scheme than those effects associated with the West Burton Solar Project, which is located wholly outside of and separate from the Laughton Wood AGLV. As such direct comparison between the findings of the Gate Burton LVIA and the West Burton LVIA are difficult given that each scheme is located within a completely different receiving landscape with a different starting baseline.</p> <p>24. The cumulative impacts of the four NSIPs Cottam, Gate Burton, West Burton and Tillbridge have been considered within the Report on the Interrelationship with Other National Infrastructure Projects [<b>EX6/WB8.1.9_D</b>]. Within the report</p>



Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				<p>Section 6 undertakes a Cumulative Impact Assessment.</p> <p>Section 8.10 of the LVIA <b>[APP-046]</b> assesses the potential cumulative landscape and visual effects resulting from incremental changes caused by other past, present or reasonable foreseeable changes resulting from other local developments, together with the Scheme.</p> <p>The LVIA Cumulative Assessment Methodology is based on recognized national guidelines contained within GLVIA3. A full methodology (agreed by LCC) is included in Appendix 8.1.3 Methodology <b>[APP-072]</b>.</p> <p>The assessment of Cumulative Effects is defined in GLVIA3 at paragraph 7.3 as:</p> <p><i>'the additional changes caused by a proposed development in conjunction with other similar developments or as the combined effect of a set of developments, taken together'.</i></p> <p>GLVIA3 sets out at paragraph 7.4 that the challenge is to keep the task reasonable and in proportion to the nature of the project under consideration and that common sense has an important part to play in reaching agreement</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				<p>about the scope of the assessment and notes in this regard that:</p> <p><i>“When the competent authority and other stakeholders are uncertain about the preferred approach the landscape professional may have to exercise judgement about what is appropriate and proportionate and be able to justify the approach taken.</i></p> <p><i>It is always important to remember that the emphasis in EIA is on <b>likely significant effects</b> rather than on comprehensive cataloguing of every conceivable effect that might occur”.</i></p> <p>Cumulative landscape and visual effects relating to the Cumulative Developments have been considered at section 8.10 of the LVIA <b>[APP-046]</b>. The cumulative assessment has been undertaken in accordance with <b>ES Appendix 8.1 LVIA Methodology [APP-072]</b> that was agreed with LCC at the series of workshops as set out in <b>ES Appendix 8.4 Consultation [APP-075]</b>. The cumulative assessment is based on the additional changes caused by the Scheme in combination with other similar developments. This includes schemes with planning consent and schemes that</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				<p>are subject of a validated planning application that has not yet been determined.</p> <p>As set out within the Cumulative Assessment Methodology this includes three other solar projects; Cottam Solar Project; Gate Burton Energy Park and Tillbridge Solar.</p> <p>The Cumulative Assessment identifies there to be an Adverse impact on the following landscape receptors:</p> <ul style="list-style-type: none"> <li>• RLCT 3a Floodplain Valleys (Construction: Negligible Adverse – Not Significant).</li> <li>• BLCA LCT Trent Washlands (individual Policy Zones TWPZ21, TWPZ22, TWPZ23, TWPZ24 and TWPZ48) (Construction: Negligible Adverse – Not Significant).</li> <li>• Land Use (Construction: Minor Adverse – Not Significant).</li> <li>• Nationally and Locally Designated Landscape (construction, operation (year 1 and year 15) and decommissioning: Negligible Adverse – Not Significant).</li> </ul> <p>Cumulative visual effects relating to the Cumulative Developments have been considered at section</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				<p>8.10 of the LVIA <b>[APP-046]</b>. Cumulative Developments considered within the assessment of Cumulative Effects are set out in Para 8.10.8 of the LVIA. The cumulative assessment has been undertaken in accordance with ES Appendix 8.1 LVIA Methodology <b>[APP-072]</b> that was agreed with LCC at the series of workshops as set out in ES Appendix 8.4 Consultation <b>[APP-075]</b>. The cumulative assessment is based on the additional changes caused by the Scheme in combination with other similar developments. This includes schemes with planning consent and schemes that are subject of a validated planning application that has not yet been determined. As set out within the Cumulative Assessment Methodology this includes three other solar projects; Cottam Solar Project; Gate Burton Energy Park and Tillbridge Solar.</p> <p>The effects of travelling through local routes are considered throughout the visual assessment within the cumulative effects assessment in section 8.10 of LVIA <b>[APP-046]</b>.</p> <p>This has considered both the in combination and sequential visibility of the Cumulative Developments.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				<p>The cumulative effects assessment identifies there to be an Adverse impact on the following visual receptors:</p> <ul style="list-style-type: none"> <li>• Viewpoint LCC-A – Middle Street (construction, operation (year 1 and year 15) and decommissioning: Negligible Adverse (Not Significant)).</li> <li>• Viewpoint VP15 – Till Bridge Lane and Middle Street (construction, operation (year 1 and year 15) and decommissioning: Negligible Adverse (Not Significant)).</li> <li>• Transport Receptor – T005 / Lincoln Lane – between Tillbridge Lane &amp; Church Lane (construction, operation (year 1): Negligible Adverse (Not Significant)).</li> <li>• Transport Receptor – T058 / Northern Railway – Saxilby to Gainsborough (construction, operation (year 1 and year 15) and decommissioning: Minor Adverse (Not Significant)).</li> </ul> <p>More detail is provided within ES Appendix 8.2 Assessment of Potential Landscape Effects <b>[APP-073]</b>, ES Appendix 8.3 Assessment of Potential Visual Effects <b>[APP-074]</b> and within the Supplementary Landscape Effect Tables <b>[REP1-</b></p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				<p><b>058]</b> and the Supplementary Visual Effects Tables <b>[REP1-059]</b>.</p> <p>Turning specifically to Sequential visibility,</p> <p>GLVIA3 defines types of cumulative visual effect as either: Combined (in the same view) or Sequential, (different developments revealed in succession as a series of sequential views.)</p> <p>Table 7.1 regarding Cumulative visual effects states:</p> <p><i>“Sequential: Occurs when the observer has to move to another viewpoint to see the same or different developments. Sequential effects may be assessed for travel along regularly used routes such as <b>major roads</b> or <b>popular paths</b>:</i></p> <ul style="list-style-type: none"> <li>• <i>Frequently Sequential: Where features appear regularly and with short time lapses between instances depending on speed of travel and distance between the viewpoints.</i></li> <li>• <i>Occasionally sequential: Where longer time lapses between appearances would occur because the observer is moving very slowly and/or there are larger distances between viewpoints.”</i></li> </ul>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				<p>GLVIA3 goes on to state at para 7.34: <i>"Users of linear routes, especially footpaths or other rights of way, or transport routes, may potentially see the different developments revealed in succession as a series of sequential views."</i></p> <p>LCC are not explicit in their identification of where potential sequential visual effects would be experienced, however given GLVIA3s referral to major roads, it is important to note that the Department for Transport classifies Major Roads to include motorways and all class 'A' roads. These roads usually have high traffic flows and are often the main arteries to major destinations. Minor roads comprise 'B' and 'C' classified roads in addition to unclassified roads. Major roads locally to the West Burton scheme are limited to the A15 and the A1500, with all other roads locally being classified as being Minor.</p> <p>As set out within the LVIA, there is no anticipated intervisibility (cumulative or sequential) associated with the West Burton Solar Project and any of the other Cumulative Schemes from the A1500, and there is no visibility of the West Burton Scheme from the A15.</p> <p>GLVIA3 also suggests that popular paths should also be included within Sequential assessments, however, as confirmed by LCC, their consideration of sequential views would not be from scenic</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				<p>routes or long distance or promoted PROW, which are those typically considered 'popular paths'. As such, given the lack of intervisibility of the 4 schemes from Major roads and popular paths, it is unclear as to where LCC ascertain the sequential effects would be experienced from.</p> <p>GLVIA3 then goes on to state at para 7.38: "Higher levels of significance may arise from cumulative visual effects related to:</p> <ul style="list-style-type: none"> <li>• developments that are in close proximity to the main project and are clearly visible together in views from the selected viewpoints;</li> <li>• developments that are highly inter-visible, with overlapping ZTVs – even though the individual developments may be at some distance from the main project and from individual viewpoints, and when viewed individually not particularly significant, the overall combined cumulative effect on a viewer at a particular viewpoint may be more significant."</li> </ul> <p>Given that neither of the above factors are applicable to the West Burton Scheme, it must be assumed that even if there was sequential visual harm, (as suggested by LCC), that this could <u>not</u> be</p>



Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				considered to be of the highest level of significance.
LCC-05	Landscape Agriculture, soils and waste	Cumulative Effects	<p><i>Landscape, Agriculture and Soils and Waste Cumulative effects</i></p> <p>25. No residual adverse cumulative effects were identified within the Applicants assessment, and only a few adverse cumulative landscape effects were identified. LCCs position is that the cumulative landscape and visual effects of the development would bring about significant landscape and visual effects when assessed alongside the proposed Gate Burton, Cottam and Tillbridge Solar schemes. The mass and scale of these projects combined would lead to adverse effects on landscape character and visual amenity over an extensive area. The landscape character of the local, and likely regional area, may be completely altered, particularly when experienced sequentially while travelling through the landscape.</p> <p>26. In respect of agriculture and soils Mr McBride for the Council noted in response to the applicants evidence on agriculture and soils that this very much was a repeat of the evidence provided at ISH 4 in relation to this schemes impact on soils and agriculture. What is being asked today is to examine the cumulative impact of this scheme on agriculture and soils together and cumulatively with the other</p>	<p>25. See response points 21 – 24 above.</p> <p>26. The individual schemes do not have an adverse impact on the agricultural land resource at the sites, or the soil resource associated with that land. No adverse effects on farm businesses are identified for any of the schemes. Given the separation between the schemes there is limited potential for any cumulative adverse impact on any individual farm business. There is no plausible cause for a cumulative adverse impact on the agricultural land resource or the soil resource associated with it.</p> <p>27. Please refer to the Applicant's response to questions 2.1.4 and 2.3.7 in <b>WB8.1.34 The Applicant's Response to ExA's Second Written Questions [REP5-039]</b>.</p> <p>28. The Applicant notes this comment and has continued to engage with LCC through Statement of Common Ground. Please refer to the submitted version at Deadline 6 <b>[EX6/WB8.3.1_A]</b>. This takes the expected agreed form of the SoCG, with the final and signed version being submitted at Deadline 7.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>solar projects in Lincolnshire both DCOs and Town and Country Planning Act applications that are in the public domain. This has not been covered today and the Council would be grateful if this information can be provided to the examination to consider and assess before the close of the examination.</p> <p>27. In respect of waste Mr McBride on behalf of the Council draw attention to the examination of the concerns regarding the amount of waste that could be created from this project and the other solar NSIP schemes during the operational and decommissioning stage. What has emerged from other examinations and this one is a failure rate of 0.4% of panels per year for the duration of the development. Depending on the exact number of panels for other schemes this has been calculated at a potential 5,000 panels reaching end of life each year and if this is multiplied by all the NSIP solar schemes in Lincolnshire already known about this could represent a figure of around 60,000 panels per year which is not an insignificant amount. Therefore consideration as to how these redundant panels are to be sustainably disposed of needs to be addressed now and this is an issue that the Council is drawing to this and other Examining Authorities.</p> <p>28. The Council's is grateful that further information was provided by the applicant at DL4 based on</p>	

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			information provided to the Cottam examination but the Council has not yet had time to review this and provide feedback. This will be done in response to the ExAs 2 <sup>nd</sup> round of questions for DL5 and also through the SOCG for DL6	

**West Lindsey District Council [REP5-044]**

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
WLDC-01	Cultural Heritage	Study Area Selection	3. CULTURAL HERITAGE <i>a. Study area selection</i> WLDC had no further comments to make on the Study Area.	The Applicant notes this comment.
WLDC-02	Cultural Heritage	Baseline Assessment	<i>b. Whether there has been a reasonable baseline assessment of the archaeological resource and the nature of development impacts upon it.</i> WLDC had no further comments to make on the baseline assessment of the archaeological resource.	The Applicant notes this comment.
WLDC-03	Cultural Heritage	Mitigation	<i>c. Approached to mitigation and the management of identified non designated archaeological remains.</i>	The Applicant notes this comment.

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			WLDC had no further comments to make on the approach to mitigation and the management of identified non-designated archaeological remains.	
WLDC-04	Cultural Heritage	Assessment of Effects	<p><i>d. The assessment of effects of the scheme on the Stow Park medieval bishop's palace and deer park, the identified harm and consideration of mitigation measures.</i></p> <p>WLDC maintains its view set out in the LIR and Written Representation with regard to the unacceptable harm the West Burton Solar Project will have on the Scheduled Monument at Stow Park Medieval Bishop's Palace and Deer Park.</p> <p>ExA, Applicant and Historic England discussion</p> <p>WLDC noted the discussion regarding the degree of harm that the proposal will have upon the Stow Park medieval bishop's palace and deer park. The ExA recognised the clear disagreement between the applicant and Historic England regarding the extent of the harm. Historic England's (HE) position is that the proposal would clearly result in 'substantial harm' being caused to the scheduled monument as a consequence of the proposed works would intrude within its setting, causing impacts which would constitute 'substantial harm'.</p>	The Applicant disagrees with Historic England and West Lindsey District Council's submission and refers to the <b>Stow Park Cultural Heritage Position Statement [REP5-027]</b> , which details the composition of the Scheduled Monument and the contribution made by setting to its significance with consideration to the Historic England Official List Entry, the Applicant's justification for their conclusion that the level of harm is less than substantial harm, as well as the policy tests that are relevant to the Scheme within the former Stow Park deer park area.

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>HE further explained the strong relationship between the moated site (the bishop's palace) and the deer pale. Whilst acknowledging that the landscape is naturally different from how it would have been encountered in the medieval age, HE explained that experience of all park landscapes are kinetic. The setting, it's understanding and contribution to the significance of the Scheduled Monument is about movement through the space. There are good views across this landscape at various points, at which one can reconstruct the space visually and mentally and interpret how the landscape would have looked and how it relates to the understanding of the assets.</p> <p>HE explained that the introduction of solar arrays into this space would drastically transform this experience, with the introduction of modern infrastructure. Whilst the landscape has inherently altered over time, it is broadly similar being agricultural in character. The introduction of solar panels will result in the space no longer being that of a modified landscape. HE also confirmed that the various components of the ancient monument need to be considered as a whole.</p>	

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>In response, the applicant stated that they are in agreement with the listing of the scheduled monument and the three elements of the monument derive their significance from their archaeological and historic interest. The despite between the applicant and HE relates to the how the setting contributes to the significance of the scheduled monument.</p> <p>The applicant sought to justify their position in this regard by stating that the post-medieval landscape has been compromised by the railway line and the Ministry of Defence storage facility. As a consequence, the applicant considers that the landscape no longer feels like a former deer park when you stand within it, as most of it is not a modern agrarian landscape. The applicant also gave weight to the reversible nature of the scheme in justifying the acknowledged harmful impacts.</p> <p>In response to a question from the ExA regarding how the design of the scheme has sought to respond to the Scheduled Monument, the applicant confirmed that mitigation measures are limited due to any presence of solar arrays in the area would be considered harmful. Reducing the height of the panel would not significantly reduce</p>	

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>that impact, however the project has avoided directly impacting the boundary of the scheduled monument.</p> <p>In response to what measures they consider could or should be taken to mitigate the impacts, HE states that their view as the statutory body is that all panels from the areas adjacent (within) the Scheduled Monument would remove their concerns. HE stated that, in their view, it is very unusual that this has not already been designed out considering the designation of the asset.</p> <p>In response, the applicant stated that this would result in the loss of 128MW which would affect the feasibility of the project. In reply to a question from the ExA, the applicant confirmed that both fixed and tracking panel of a height of 4.5 metres are being considered and that reducing their height would not alter the conclusions in the ES.</p> <p>WLDC position</p> <p>WLDC wholly concurs with the view expressed by HE which reflects fundamental objection to the application set out in the Local Impact Report and Written Representation, in that unacceptable harm will be caused to the medieval bishop's palace and deer park Scheduled Monument.</p>	

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>WLDC wished to comment further on this position but was unable to do so during the hearing but wishes to take this opportunity to make clear its views clear.</p> <p>The starting position is to have regard to the statutory duty the decision maker has with regard to impacts of development upon listed buildings, conservation areas and scheduled monument. Regulation 3 of the Infrastructure Planning (Decisions) Regulations 2010 requires decision makers, when deciding applications for development consent which affects or is likely to affect a scheduled monument or its setting, to have regard to the desirability of preserving the scheduled monument or its setting. It is therefore clear that this statutory duty relates to the setting of scheduled monuments and not solely any direct physical harm.</p> <p>The schedule description for the bishop's palace and deer park scheduled monument is clear in that the historic importance of the designated Scheduled Monuments of the Bishop's Palace and the park pales are defined and bound by the deer park to which they relate and frame. The park was naturally a rural landscape and it is this character that is integral to the importance of the Scheduled</p>	



Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>Monument. Any degradation or erosion of that landscape character will cause significant harm to the setting of the Scheduled Monuments.</p> <p>NPS EN-1 (2023) requires great weight to the conservation of a heritage asset, irrespective of whether any potential harm amounts to substantial, total loss, or less than substantial harm to its significance (para. 5.9.25). Substantial harm to Scheduled Monuments should be “wholly exceptional” (para. 5.9.28). Where a proposed development will lead to substantial harm of a designated asset, the Secretary of State should refuse consent unless it can be demonstrated that the substantial harm to, or loss of, significance is necessary to achieve substantial public benefits that outweigh that harm or loss. Loss of significance relates to the setting of Scheduled Monument and not simply direct physical harm.</p> <p>Policy S57 of the CLLP requires proposals to protect, conserve and seek opportunities to enhance the environment of Central Lincolnshire. Development that will result in substantial harm to, or the total loss of, a designated heritage asset will only be granted permission where it is necessary to achieve substantial public benefits that outweigh the harm or loss (or subject to a</p>	

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>range of criteria relating to viability and use of an asset).</p> <p>The West Burton Solar Project ES concludes a 'large adverse' impact upon the bishops palace Scheduled Monument. WLDC consider this to equate to 'substantial harm' for the purposes of NPS, NPPS and CLLP policy.</p> <p>WLDC considers that the significance of an medieval deer park relates not only to the containment and protection of deer, but also the wider character of the landscape. As a consequence, this setting would experience substantial harm by the loss of rural character that would entail by the existence of solar panels.</p> <p>WLDC wholly disagrees with the applicant's attempt to justify the adverse impacts on the basis that the current landscape has changed from the original medieval landscape. This is clearly apparent as landscapes change over time, however the historic importance of the Scheduled Monuments are defined by rural landscape that still exists today. In it unquestionable that the assets are current read and understood in relation to the rural landscape character that they frame. The applicant, however, takes the position that, as the rural landscape has changed since</p>	

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>medieval times (albeit still a rural landscape that can be understood), the construction of modern solar panels of up to 4.5metres in heigh with modern utilitarian boundary fencing makes no difference in terms of that landscape character and the role it has in defining the setting of the Scheduled Monument.</p> <p>WLDC considers that the setting of the Scheduled Monuments would be materially harmed through the construction of solar panels and the fact no direct physical harm to the Scheduled Monuments does not avoid the statutory duty and policy requirement to conserve their setting.</p> <p>The approach taken by the applicant and their attempts to justify the acceptability of the impacts of the project on the Scheduled Monument has been flawed.</p> <p>The likely impacts and their acceptability expressed by HE does not come as a surprise to the applicant. HE made the applicant aware during the EIA scoping and statutory pre-application phases of the project that the siting of the solar panels within the setting of the scheduled monument would be unacceptable, providing well evidenced advice in doing so. The applicant has chosen to go against this advice</p>	

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>from the statutory body, and have sought to justify the impacts on the basis that the he removal of panels would be 'too detrimental to the scheme' and that it would be 'temporary and reversible' (Consultation Report, Appendix 5.13: Section 42 Applicant Response, pp.415-419). This justification is weak in that, no evidence has been provided to demonstrate what 'too detrimental to the scheme' means in policy terms; in any even the commercial viability of a project does not constitute a reason to override the statutory duty; and the lifespan of the project for 60 years means that the project should be considered 'permanent' and not a temporary impact.</p> <p>WLDC notes and agrees with HE's position that the removal of panels within the setting of the scheduled monument is require in order for the impacts to be acceptable. If the panels and infrastructure are not removed, WLDCs view is that the DCO application should be refused on the basis of unacceptable substantial harm that would be caused to the bishop's palace and deer park Scheduled Monument.</p>	
WLDC-05	Cultural Heritage	Cumulative Effects	<p><i>e. Cumulative impacts, on the wider landscape of heritage assets setting with specific reference to effects on Roman Villa at Scampton</i></p>	The Applicant notes this comment.

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>WLDC have no comments to make regarding the cumulative impact assessment on the wider landscape of heritage assets.</p> <p>WLDC noted the discussion regarding the updated assessment carried out by the applicant and Hes agreement with the conclusions.</p>	
WLDC-06	Landscape and Visual	Assessment	<p>4. LANDSCAPE AND VISUAL</p> <p><i>a. Review of design coherence and the assessment of landscape and visual effects</i></p> <p>WLDC have made previous comments in writing regarding the design methodology adopted by the applicant.</p> <p>Although WLDC were unable to make specific comments on this agenda item, previous comments remain reflective of its position with regard to the approach to overall scheme design, and how its fragmented and piecemeal layout has contributed to a scheme with far greater impacts than other schemes with the same installed capacity but that have been designed within contiguous and well-contained sites.</p>	<p>Although the Scheme comprises a series of independent parcels of land or Sites, they are set within an extensive agricultural landscape. Each site is set apart by their associated features such as robust hedgerows, woodland and tree cover, intervening settlements and the road and rail infrastructure. The Scheme is also offset from all key receptors such as settlement edges, individual residential properties, PRow and transport routes which further assist with its assimilation and dispersion across the landscape. The discrete parcels of land in the Scheme are distanced so that the Scheme would not be perceived in its entirety and the solar panels are distributed 'in and amongst' the landscape features allowing them to help assimilate into the landscape to a comfortable degree. The provision of a solar scheme with discrete parcels of land is therefore a more favourable approach than</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				having a single large site, as it allows for a distributed and less obtrusive deployment of the solar panels. The presence of the intervening landscape also provides scope for areas of mitigation and the ability to build upon the connectivity of green infrastructure and ecology and nature conservation and retain the existing landscape pattern.
WLDC-07	Landscape and Visual	Design Parameters	<p><i>b. Identification and control of design parameters, including post-consent</i></p> <p>WLDC notes that the applicant intends to respond to this agenda item in writing.</p> <p>WLDCs current view is that it doesn't readily identify significant value in the imposition of detailed design controls and parameters post-consent. For such measure to genuinely be effecting in guiding the design of the scheme, they should be imposed at the start of the pre-application process and be able to be influenced through the statutory consultation and EIA processes.</p>	<p>As discussed during ISH5 (see the <b>Written Summary of the Applicant's Oral Submissions at Issue Specific Hearing 5 [REP5-037]</b>), the <b>Concept Design Parameters and Principles [EX5/WB7.13_D]</b> contains fixed parameters and design, which is secured by requirement 5 in Schedule 2 of the <b>Draft Development Consent Order [EX6/WB3.1_G]</b>.</p> <p>The <b>Concept Design Parameters and Principles [EX5/WB7.13_D]</b> should be read alongside the Design and Access Statement <b>[EN010132/APP/WB7.6]</b>, which sets out the main design principles and design process undertaken for the Scheme.</p> <p>As is typical for NSIPs, the detailed design of the Scheme will take place after consent is granted and will be subject to the approval of the local authority. Section 1.2 was inserted</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				into the <b>Concept Design Parameters and Principles [REP5-094]</b> at Deadline 5, which clarifies the role of the design champion. The design champion will continue to perform the same functions through the post-consent detailed design stages, including in the preparation of the documents and plans secured through the requirements of the <b>draft Development Consent Order [EX6/WB3.1_G]</b> .
WLDC-08	Landscape and Visual	Management/control, Mitigation/enhancement	<p><i>c. Management/control of tree and hedgerow removal and management of mitigation/enhancement measure post-consent</i></p> <p>WLDC agree with LCCs position disagreeing with the assessment conclusions reached by the applicant. The extensive change in landscape character as a consequence of the proposed scheme will adverse through the construction of solar panel and associated infrastructure upon currently open rural agricultural land.</p> <p>WLDCs position is that it is understood that the conclusions of 'beneficial' impact reached by the applicant with regard to landscape and visual impacts are based upon the proposed mitigation planting. What is not clear however is how that proposed mitigation has been balanced with the</p>	<p>The Scheme is considered to lead to adverse and neutral landscape effects during Construction and Year 1 phases of the Scheme, but by Year 15, following establishment of the proposed mitigation and landscape enhancement planting, effects on certain receptors are considered beneficial, but only ever at most, minor. No Significant (adverse or beneficial) In-Combination effects are identified. No beneficial visual effects are identified within the LVIA <b>[APP-046]</b>.</p> <p>Mitigation measures are set out in The Outline Landscape and Ecological Management Plan <b>[EX6/WB7.3_E]</b> (the 'OLEMP') and will be secured through Requirement 7 in Schedule 2 of 3.1 Draft Development Consent Order</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>fundamental change in overall landscape character. When character (and not solely visual effects) are considered, the applicant has not explained how such a wide area of landscape character change can occur but be concluded as 'beneficial' solely due to boundary treatment reinforcements. WLDC is not clear if the applicant has given due weight to landscape character as an impact in itself, as opposed to only giving consideration to whether receptors can 'see' the development (visual effects not landscape character).</p> <p>WLDC maintains fundamental objections to the application based upon it adverse impacts on a wide area of landscape causing harm that outweighs the benefits of the project, particularly on a cumulative basis with other nearby projects.</p>	<p><b>[EX6/WB3.1_G]</b>. This includes the planting of new trees with a total area of new woodland (<b>approximately 13.7ha</b>) proposed across the Scheme (para. 4.4.4). The OLEMP also focuses on the gapping up of currently defunct hedgerows, creation of new hedgerows (<b>approximately 7.1km</b>) at boundaries where none exist (para. 4.3.11). There will also be planting around Public Rights of Way and where landscape and visual impact mitigation is required. In addition, limited opportunities for the replanting of old, removed field boundaries (where appropriate) have been pursued, historic hedgerow on West Burton 1 has been identified using 1940s Ordnance survey maps and will be re-planted (para. 4.3.2).</p> <p>At Deadline 4 the Applicant updated Schedule 2 Requirement 9 in the WB3.1_E Draft Development Consent Order Revision E [REP4-024] 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</p>



Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				<p>must be submitted to and approved by the relevant planning authority.</p> <p>Beneficial Landscape effects are derived from the significant amount of landscaping provided by the environmental masterplan. This new landscaping has been designed to build upon and positively respond to the aims and management guidelines of the Regional and Local Landscape Character Assessments. For example, the planting of large blocks of woodland have been avoided, instead native woodland shelter belts and individual trees have been utilised to support the existing character of this area.</p> <p>Please refer to the LVIA <b>[APP-046]</b> specifically Table 8.21 which sets out the strategic approach to the landscape design parameters that have been adopted in the process of developing the environmental masterplan and associated landscape mitigation measures.</p>
WLDC-09	Landscape and Visual	Cumulative Effects	<p><i>d. Assessment of cumulative landscape and visual effects.</i></p> <p>WLDC remain of the view that there remains a significant inconsistencies between the cumulative assessments carried out by each</p>	<p>The Applicant has responded to WLDC's Written Representation <b>[REP1A-004]</b> at Section 2.4 of <b>WB8.1.17 Response to Written Representations at Deadline 1 Part 1 [REP3-034]</b>.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>respective project. The conclusions vary significantly, which suggests an inconsistent application of methodology and a significant variation in professional judgement.</p> <p>This inconsistency is highlighted starkly in the Join Report on Interrelationships which remains a document that simply reports these inconsistencies and does not constitute a coherent and consistent cumulative assessment upon which the decision maker can rely.</p> <p>The fact that there is such a wide variation in conclusion leaves all parties, and particularly the Secretary of State, in a position where there is uncertainty regarding what the likely cumulative impacts are likely to be. This will inherently cause confusion and scope for inconsistency in decision making, especially where three of the NSIP projects could be determined at the same time.</p> <p>WLDC has maintained a consistent view in all examinations that a cumulative assessment that considers all scenarios must be carried out. In the absence of such an assessment, the SoS is limited, in WLDCs view, to only being able to refuse all three application, grant one of them, or grant all of them. There is no environmental information</p>	<p>The Applicant furthermore refers to ENE-01 above in specific regard to matters of "inconsistency" between the methodologies of assessment set out in the <b>Joint Interrelationship Report [EN101032/EX6/WB8.1.9_D]</b>.</p> <p>The Applicant reiterates its position that the assessment of cumulative effects in the <b>Environmental Statement [APP-039 to APP-061, REP1-012, REP3- 010]</b>, provides a sufficient level of detail to satisfy EIA Regulations 2017 Schedule 3 paragraph 1(b) and paragraph 4.2.3 of the recently adopted NPS EN-1 (Nov 2023).</p> <p>The Applicant is also confident that the approach is consistent with the provisions set out in NPS EN-1 (2011).</p> <p>That notwithstanding, the Applicant has provided a number of updated documents to update the cumulative impact assessment throughout the DCO application process, particularly as new projects are announced and more information about these projects becomes available. At Deadline 5 this included:</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>available to make a decision on any other combination (e.g. grant 2 of the 3 applications).</p> <p>The cumulative assessment for the West Burton Solar Project has not properly considered and explained its conclusions for the 60 year lifespan for Gate Burton, Cottam and west Burton cumulatively. There is no proper reassessment to explain how the additional 20 year lifespan proposed mid-examination for Cottam and West Burton has been dealt with, including what weight has been given to an additional 20 years period.</p> <p>At 'acceptance' stage of the West Burton project there was Cottam with a 60 year lifespan, Cottam with a 40 year lifespan and West Burton with a 40 year lifespan. Following the increase in the lifespan of Cottam and West Burton by a further 20 years each, the applicant has simply updated a summary chapter of the ES and stated 'no change' to the magnitude of impacts. The lack of proper assessment and explanation as to how this conclusion has been reached is unacceptable and renders the EIA inadequate for decision making purposes. At no stage has the applicant acknowledged any change to impacts whatsoever despite two NSIP-scale project now being proposed to exist for an additional 20 years each</p>	<ul style="list-style-type: none"> <li>• <b>WB8.2.5_A Technical Note on Cumulative Effects of Additional Schemes Revision A [REP5-030];</b> and</li> <li>• <b>WB8.4.23.1 ES Addendum on Cumulative Effects [REP5-015]</b></li> </ul> <p>The Applicant is confident that the implications of the Scheme lifetime being up to a maximum of 60 years is suitably set out in <b>WB6.2.23_B Summary of Significant Effects Revision B [REP3-010]</b> and <b>8.2.3 Review of Likely Significant Effects at 60 Years [REP1-060]</b>. The methodology for how each topic has comparatively assessed the likely significant effects of a 40-year Scheme versus a 60-year Scheme are explained in <b>[REP1-060]</b>.</p> <p>The Applicant understands that the "24% replacement figure" referred to by WLDC is derived from the anticipated panel failure (and therefore replacement rate) of 0.4% per annum over a 60 year operational lifetime of the Scheme. With regard to mechanism for monitoring if the ES assessment conditions are exceeded, the Applicant defers to its answer to Question 2.9.3 in <b>WB8.1.34 The Applicant's Response to ExA's Second Written</b></p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>to 60 years. WLDC does not consider this to be credible as there will inherently be some change to the impacts and professional judgement have been applied to reach them.</p> <p>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 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</p>	<p><b>Questions [REP5-039].</b> The Applicant furthermore refers to Part 2, paragraph 5(3) of the draft DCO [EX6/WB3.1_G] which sets out that in regard to maintaining the proposed development, the draft DCO "does not authorise the carrying out of any works which are likely to give rise to any materially new or materially different effects that have not been assessed in the environmental statement." Failure to comply would therefore constitute a breach of the DCO which is automatically a criminal offence and thus the Applicant is confident that this will be complied with.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			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-10	Landscape and Visual	Cumulative Effects	<p>5. CUMULATIVE IMPACTS</p> <p><i>a. Overview of the approach to the consideration of cumulative effects:</i></p> <p><i>i) Applicant to provide an overview including methodology, the likely significant effects identified, any updates and the approach to ongoing collaboration.</i></p> <p><i>ii) Consideration of whether other plans or projects need to be included in the cumulative assessment.</i></p> <p><i>iii) Consideration of whether an appropriate level of detail has been considered at construction, operational and decommissioning stages, particularly in terms of how construction activity and mitigation would be co-ordinated.</i></p> <p><i>b. Topic based discussion (if not already covered in ISH3 and ISH4 discussions):</i></p> <p><i>i) Climate change</i></p> <p><i>ii) Construction traffic management</i></p>	<p>Please refer to agenda item 5 in <b>Written Summary of the Applicant's Oral Submissions at Issue Specific Hearing 5 [REP5-037]</b>.</p> <p>With regard to the lifespan and temporary nature of the Scheme, please refer to the Applicant's response to question 2.1.4 in <b>WB8.1.34 The Applicant's Response to ExA's Second Written Questions [REP5-039]</b>.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p><i>iii) Cultural heritage</i></p> <p><i>iv) Landscape</i></p> <p><i>v) Biodiversity and Ecology</i></p> <p><i>vi) Soils and ag</i></p> <p><i>vii) Socio-economic</i></p> <p><i>viii) Waste</i></p> <p><i>c. Any other points not already covered on cumulative assessment and impacts</i></p> <p>WLDCs position on the approach taken to the assessment of cumulative impacts are set out in the summary of the discussion regarding landscape and visual impacts above and were not, and will not, be repeated here.</p> <p>The concerns expressed regarding the unilateral extension of the project lifespan to 60 years by the applicant without demonstrating how the implication of the extension of time has been assessment equally applies throughout the ES. All chapters that reference the 40 year lifespan have inherently been assessed on that basis, and no explanation of the additional weight given to the additional 20 years has been given in these chapters.</p>	

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>WLDC maintain the view that the application must be considered as a permanent project for the purpose of decision making as the length of time goes beyond what a 'temporary' project could reasonably be considered.</p>	

### 3.2 Submissions by 7000 Acres

#### 7000 Acres [REP5-048] – Comments on the Applicant's Deadline 4 Supporting Video – dated 5 March 2024

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
7A-01	Principle of Development  Landscape and Visual Impact	Flyover Video and Presentation of Information	<p><i>Introduction</i></p> <p>7000Acres has repeatedly raised concerns over how the Applicant has attempted to downplay the impact of this scheme, and the cumulative impact of the growing number of solar NSIPs in the region.</p> <p>This footage using Google Earth is yet another attempt to conceal the true impact of this industrial scheme (Deadline 4 Rep 4-099 using Google Earth Data) .</p> <p><i>Google Earth "Flyover"</i></p> <p>Google Earth imagery of rural locations is frequently several years out of date, so can the Applicant confirm this imagery is current? Imagery currently available on Google Earth Pro for the region shown states it was updated in July 2020, 4 years ago. Commercial satellite data is readily available and would be a valid source of terrain imagery.</p> <p>The "Flyover" does not display any means for the viewer to orientate themselves, such as a compass heading. The lack of orientation, combined with the random and meandering nature of the "flythrough", varying speeds and heights makes it hard for a viewer to assess the scale of the multiple solar industrial NSIPs.</p>	<p>The voluntary aerial flyover for the Scheme <b>[REP4-098]</b> has not been produced to inform the assessment process. It has been produced to demonstrate the geographical extent of the 4 Solar NSIP Schemes contained within the Joint Report on Interrelationships between Nationally Significant Infrastructure Projects - Revision C <b>[REP4-059]</b>. This was not requested by the ExA of this Scheme but by the Cottam Solar Project ExA. It has only been produced for this Scheme for consistency with Cottam. 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 6.4.2.1 Environmental Statement - Figure 2.1 - Cumulative Assessment Site Plan <b>[APP-140]</b>, which was submitted as part of the original DCO application in March 2023.</p> <p>The diagrams used in the Phase 1 consultation materials were illustrative of the types of equipment proposed as detailed designs has not been developed. However, the materials presented at the Phase 2 consultation included representative elevations. The page entitled</p>



Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>Furthermore, the current imagery lacks the Steeple Solar, One Earth and Stow Park schemes, all of which have a significant cumulative effect on the visual impact in the region.</p> <p><i>Industrial Nature of the Scheme</i></p> <p>The Applicant has made no attempt to show the industrial nature of their scheme. In particular, none of the solar panels are shown and neither is the BESS. By overlaying the current rural landscape with some pastel colours and field numbers downplays the visual impact the solar industrial scheme will actually have on the region. The use of pastel colouring, through which the furrows, crops and tracks in the field are still visible, is not a valid representation of the industrial nature of these solar projects. As a minimum, the solar panels and BESS must be shown.</p> <p>By merely colouring in some fields the Applicant has made no attempt to show the vertical extent of their scheme. Furthermore, the pale colours used are not representative of the brutalist architecture being imposed on a rural area.</p> <p><i>Visual Impact</i></p> <p>Even though the "flythrough" is incomplete and flawed, it starts to show the monumental impact that West</p>	<p>'Indicative examples of screening and ecological buffers' within <b>Consultation Report Appendix 5.7: Phase Two Community Consultation Materials (Part 3 of 3) [APP-031]</b> includes labels showing that the solar panels would have a height of 4.5m.</p> <p>Throughout the pre-application and examination process, the Applicant has sought to provide material that accurately represents the Scheme and its likely impacts.</p> <p>At Deadline 5, the Applicant submitted a <b>Technical Note on Cumulative Effects of Additional Schemes [REP5-030]</b> which sets out likely significant cumulative effects based on published information relating to all relevant schemes.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>Burton and the multiple other schemes will have on this farming region.</p> <p><i>Further Examples of the Applicant Providing False Imagery</i></p> <p>The video is consistent with earlier material used by Island Green Power during the Public Consultation for the Cottam and West Burton schemes. This diagram clearly shows the solar panels being no higher than the security fencing, i.e. 2.5m high. Nowhere in the document sent to local residents, or on any of the material provided during the public meetings was it shown that the Applicant intended to use unprecedented 4.5m high tracking panels. Local residents had to interrogate the PEIR to find out the Applicant's true intent.</p> <div data-bbox="748 890 1429 1189" data-label="Diagram"> <p><b>Components of a typical solar project</b></p> <ol style="list-style-type: none"> <li>1. Solar Energy</li> <li>2. Fencing</li> <li>3. Solar Panels</li> <li>4. Inverter (DC to AC power converter)</li> <li>5. Landscape Area</li> <li>6. Substation</li> <li>7. Energy Storage</li> <li>8. Underground Cable</li> </ol> <p>Cottam and West Burton Phase 1 Consultation Leaflet (IGP, 2022)</p> </div> <p><i>Summary</i></p>	

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>In summary, the Applicant has a long track record of providing inaccurate and misleading imagery. This deliberately downplays the considerable impact from this scheme, and the cumulative impacts from the numerous solar NSIPs in the local area.</p> <p>The Google Earth “flythrough” does not give a true impression of the various schemes, because:</p> <ul style="list-style-type: none"> <li>• it is incomplete and does not show all the relevant schemes, such as Steeple Solar;</li> <li>• it does not show the industrial nature of the schemes, merely colouring parts of the rural landscape;</li> <li>• it does not show the vertical extent of the solar panels, BESS and other industrial features;</li> <li>• it is difficult to gain a true impression of the impact due to the lack of orientation cues, the meandering way the flythrough occurs, along with varying heights and speeds.</li> </ul> <p>Even taking into account the flaws detailed above, the “flythrough” has started to show the monumental impact this and the other solar NSIPs in the immediate area will have on the farming landscape.</p> <p>This dissembling use of Google Earth is consistent with the other tactics the Applicant has employed to downplay the major impact that using 4.5m high sun</p>	

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>tracking solar panels will have on this rural landscape. The Applicant has consistently failed to apply a reasonable worst-case assessment when assessing the impact on the landscape, instead they have made over reliance on "professional judgement".</p> <p>To assist the ExA, we have submitted a copy of a map showing the latest update on the vast acreage covered by the solar NSIPs and sub NSIPs in the local area.</p> <p>A note of caution, this map might shortly be out of date as we are aware of other solar NSIPs being launched in the coming months!</p>	

**7000 Acres [REP5-049] – Comments on the Response to the Environmental Statement ES Addendum 21.1: Human Health and Wellbeing effects**

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
7A-02	Human Health and Wellbeing	Assessment Methodology	7000 acres has concerns with the Applicant's statement that this document is "suitably comprehensive and a proportionate assessment" for the following reasons. The way this has been written clearly demonstrates that a person with a health background has not been involved. A desktop review does not take into account local intelligence to advise and provide a balanced view. This needs to be provided by the local stakeholders in health. Elements of this report on important issues are simply stated as "no significance" without the knowledge and base to make comments. The author is a Town Planner with no health background (from the LANPRO website and from his involvement in the West Burton session where he participated as an expert). Therefore, we do not recognise the author as an expert.	<p>Please refer to the Applicant's response to:</p> <ul style="list-style-type: none"> <li>• Question 2.6.4 in <b>WB8.1.34 The Applicant's Response to ExA's Second Written Questions [REP5-039]</b>;</li> <li>• Section 2.9 of <b>WB8.1.18 Response to Written Representations at Deadline 1 Part 2 [REP3-035]</b>, in response to previous representation <b>[REP1A-015]</b>;</li> <li>• Section 2.2 in <b>WB8.1.31 Applicant's Response to Deadline 4 and Deadline 4A Submissions [REP5-038]</b>; and</li> <li>• <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>.</li> </ul> <p>As discussed during <b>Issue Specific Hearing 4 [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 healthcare or medical professional. This also is the case for Health Impact Assessments. The professional ability, background, and level of experience of the chapter authors and supporting</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				team at Lanpro is set out in <b>6.3.1.1 Environmental Statement – Appendix 1.1 Statement of Competence [APP-062]</b> .
7A-03	Human Health and Wellbeing	Issues with Addendum	<p>These are the issues with this addendum on human health and health and wellbeing:</p> <ul style="list-style-type: none"> <li>• This report does not specifically outline potential health outcomes, something which should be reported. How does solar improve health? What are the positive and negative impacts? In our 7000 acres WR we have outlined potential health outcome risks which have not been adequately addressed. We will comment later on their deductions in this report.</li> <li>• This addendum does not have a literature review attached. In Chapter 15/21, their references are very scanty on health with papers biased towards the energy sector. We would expect more papers to back up their claims within this addendum.</li> <li>• We believe that it is important to interpret the data correctly. For this to occur, one needs to interrogate the data and for that reason, the searches on data to inform an opinion has been unsatisfactory. For this to occur, people in the health sector deep dive data to fully understand what it is telling us. Therefore, a desktop review from a distance will not highlight local issues, especially if the local stakeholders have not been involved. This report is</li> </ul>	The Applicant notes this comment and addresses the points in full in 7A-04 to 7A-30 below.

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>low on stakeholder knowledge. Data needs to be thoroughly scrutinised.</p> <ul style="list-style-type: none"> <li>• There has been very little critical assessment by the applicant as to their process and evaluation.</li> <li>• They have not identified the gaps in their methodology and assessments. We would like to know what the unintended consequences will be. These need to be identified</li> <li>• More importantly, there is no balanced approach to understanding and reporting impacts.</li> <li>• There is nothing in this report as to how they will identify health inequalities or how they will mitigate against this e.g. the Traveller site at Odder and concerns around flooding which will affect this community with health consequences. In Traveller groups we must recognise literacy and digital exclusion. On average this group have life expectancies 10 15 years shorter than the general population (Quality and Human Rights Commission). For this group, sending them information and letters is not adequate. They need face to face contact. Did IGP engage with them directly? Another important excluded group are carers. Has IGP engaged with the local carer's association?</li> </ul>	

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<ul style="list-style-type: none"> <li>• It does not feel very democratic. People have rights to participate in major decisions that affect their lives. People need to be informed in a balanced way to do this. Most people in our area are currently unaware of the long-term consequences these schemes will have on them, that is because a balanced view has not been articulated. Merely stating this scheme will generate electricity for x amounts of homes means to local people, my home, free electricity! The reach has not been far enough.</li> <li>• How will these schemes maximise health and wellbeing benefits. Clearly, this has not been articulated. Over 15 years people will get used to seeing rows and rows of panels in their fields. That does not articulate the health benefit.</li> <li>• The process has not been participatory due to the right stakeholders being engaged to give the local intelligence and debate their concerns going forward, especially the cumulative impact.</li> <li>• More qualitative data is required. The only qualitative data supplied was Census data from 2011 (Figure 18.4 Environmental Statement Chapter 18: Socioeconomics, Tourism and Recreation). Ask us how this scheme will make us feel emotionally,</li> </ul>	



Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>physically and mentally so that that there is well-balanced feedback through an independent survey.</p> <ul style="list-style-type: none"> <li>• How will the applicant propose to monitor the implementation and identify indicators to measure health and wellbeing e.g noise levels or health management plans which have not been included within this report. They should set parameters to monitor health.</li> <li>• Governance issues especially around decision making and probity. This should be clearly demonstrated which is not the case. 7000 Acres see all these schemes as one scheme.</li> </ul>	
7A-04	Human Health and Wellbeing	Health Impact Assessment	The Applicants legal team advised during a West Burton hearing, that guidance on health and wellbeing was constructed from Institute of Environmental Management and Assessment (IEMA) guidelines.	The Applicant confirms this.
7A-05	Human Health and Wellbeing	Methodology	Reference 2.12: Flooding, Ground contamination, Noise and Vibration, Glint and Glare, Air Quality, Socio-economics and Recreation, Waste and EMF are all by products of the scheme which affect health. Most fall under the heading of health protection. However, when looking at health within populations, one needs to look beyond these headings to really understand how schemes like these can affect the people who live and work within the affected areas concerned. Therefore,	The Applicant refers to Agenda items 5a) and 5b) of <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> which sets out why these determinants of health (i.e. where there is a determinable pathway to health and wellbeing impacts) have been considered in this assessment,

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>understanding Population Health Management is important, as this will help to identify and reduce health inequalities by defining the wider determinants of health, health behaviours and lifestyles, places and communities in which we live and an understanding of integrated health and care system (Health and Social Care Act 2022). It is for this reason that 7000 acres is requesting a full Health Impact Assessment with the right stakeholders who hold the local data intelligence and that a balanced opinion can be obtained to guide the examiners who ultimately advise the Secretary of State. The cumulative effect of all these schemes is massive. In this report there is very little on both physical and social health and given that this area has a large elderly population, this has implications in the context of a rural area. 7000 acres have presented this within their WR. Using GP QOF data highlights disease profiles such as Respiratory, Heart, Mental Health, Neurological and Musculoskeletal disorders and Cancer, of which we have patients with all and some with multiple conditions living within our communities. 7000 acres has highlighted issues within the Equality Impact statement around those vulnerable and protected characteristics. We have also pointed out the Core20Plus5 work within the NHS which looks at health inequalities which could be impacted by this scheme. We have also pointed out that this scheme and others</p>	<p>and the data sources to undertake this assessment.</p> <p>Community fragmentation has been assessed by way of community severance. The assessment in (Table 14.24 of <b>6.2.14 Environmental Statement - Chapter 14 Transport and Access [APP-052]</b> identifies a temporary negligible adverse effect during construction. This is not a significant effect, and there are no anticipated instances of community severance once the Scheme is operating, as there are no long-term impacts on the use of the highway or PROW network for access between or within communities.</p> <p>The Applicant does not consider that the Scheme will disproportionately affect younger people or adversely contribute towards existing emigration from rural communities. The measures in the <b>Outline Skills, Supply Chain and Employment Plan Revision A [EX6/WB7.10_B]</b> are aimed to improve employment and education opportunities in and around the Scheme's location, and may go some way (even if limited by scope during the Scheme's operational life) to mitigating emigration of younger people from these communities.</p> <p>The Applicant also refers to its responses to references 7A-08, 7A-11 and 7A-17 in <b>WB8.1.31</b></p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>may potentially fragment communities and social networks due to the impact of this and other schemes affecting economic and environmental living conditions with indirect effect on health and health outcomes. There needs to be a clear understanding of how communities directly live off the land. How does one mitigate against outward migration of young people, which leaves potential gaps in social care?</p>	<p><b>The Applicant's Response to Deadline 4 and Deadline 4A Submissions [REP5-038]</b> and section 2.8 of <b>WB8.1.18 Response to Written Representations at Deadline 1 Part 2 [REP3-035]</b>.</p>
7A-06	Human Health and Wellbeing	Assessment Methodology	<p>In 2.2.3 by not providing a distinct assessment of human health and wellbeing, how can one adequately set out a summary of health and wellbeing impacts?</p>	<p>The Applicant refers to its submissions on Agenda items 5a) and 5b) of <b>WB8.1.28 Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 4</b> and <b>Responses to Action Points [REP4-071]</b> and 7A-11 in <b>WB8.1.31 The Applicant's Response to Deadline 4 and Deadline 4A Submissions [REP5-038]</b>.</p>
7A-07	Human Health and Wellbeing	Assessment Methodology	<p>2.2.5 This was a desktop health assessment, which does not, in our view, address the local issues. The author clearly has a limited understanding of health issues and this why certain significant areas of health were missed in the original DCO. Areas such as mental health, constitutional lifestyle factors, understanding rural health issues, and the fabric of our society such as social networks and how they will be affected and how deprived areas will benefit socioeconomically other than to state jobs and training potential will be on offer.</p>	<p>The Applicant refers to paragraphs 4.3.16-4.3.18 of <b>WB8.4.21.1 Environmental Statement - ES Addendum 21.1: Human Health and Wellbeing Effects [REP4-077]</b> with regard to the scope of the assessment undertaken, and how this was agreed with PINS and statutory undertakers.</p> <p>The Applicant furthermore reiterates that it is confident that the scope and detail of assessment</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			This needs a deeper understanding from the examiners as we are not sure the applicant has an understanding of the issues in deprived areas and perhaps paying lip service.	is proportionate to the likely health impacts as a result of the Scheme.
7A-08	Human Health and Wellbeing	Professional Opinion/ Health Impact Assessment	2.2.6 How does the author, a Town Planner, mitigate against health issues? 7000 acres requests a wider health professional opinion through a proper health Impact Assessment to mitigate the impact of this and the other schemes. We also request a session on health. We welcome the Public Health report on solar farms and their impact in Lincolnshire.	<p>The Applicant refers to its response to reference 7A-02 above in this document.</p> <p>The Applicant notes that socio-economic and health impacts were discussed in detail at ISH4 and 7000 Acres made detailed submissions on health impacts during this hearing.</p> <p>Embedded and additional mitigation against health impact have been compiled from mitigation against impacts subject to the technical chapters listed in Table 21.5.1 in <b>6.2.21 Environmental Statement - Chapter 21 Other Environmental Matters [APP-059]</b> and are signposted at paragraphs 21.5.30 and 21.5.32-33 <b>[APP-059]</b>. This is repeated in more detail at Section 3.2 of <b>WB8.4.21.1 Environmental Statement - ES Addendum 21.1: Human Health and Wellbeing Effects [REP4-077]</b>.</p> <p>Furthermore, the Applicant also understands that as of Deadline 6, the public health report referenced has not yet been published.</p>
7A-09	Human Health	Rural Area	3.1.1. Our environment is recreational. This is a rural area so how does one mitigate against this when solar	The Applicant has considered the recreational use of the countryside and the use of specific

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
	and Wellbeing		panel heights are 4.5 metres high (5 metres to the highest point on the panel), creating a claustrophobic effect for those living close to them.	recreational facilities and features therein in <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b> .  The Applicant also seeks to clarify that the maximum height of the assessed tracker panels, when at full tilt angle, is 4.5m as measured from ground level, as secured by <b>WB7.13_D Concept Design Parameters and Principles Revision D [REP5-094]</b> .
7A-10	Human Health and Wellbeing	Noise	3.3 Please refer to 7000 acres WR on Noise. In particular, we have questioned the methodology and given that much of this is subjective, urban testing applied to rural settings fails because of this. Operational noise will only become apparent when the scheme is up and running and this in itself is a worry as we know that these schemes emit significant noise.	Please refer to the Applicant's responses to 7000 Acres' representations on Noise and Vibration <b>[REP1A-022]</b> , which is outlined in Section 2.15 of <b>WB8.1.18 Response to Written Representations at Deadline 1 Part 2 [REP3-035]</b> . The Applicant refers to its response to reference 7A-20 in <b>WB8.1.31 The Applicant's Response to Deadline 4 and Deadline 4A Submissions [REP5-038]</b> .
7A-11	Human Health and Wellbeing	Health Impact Assessment	Table 3.6 7000 acres requests a Health Impact Assessment. We note the authors reference to this. We believe all the schemes should be seen as one. The size and scale of these schemes in our area has a cumulative effect to warrant one single Health Impact Assessment which we believe the examiners of all the	Cumulative health impacts from the NSIPs in the Till Valley Area are summarised in paragraphs 21.5.37-43 in <b>6.2.21 Environmental Statement - Chapter 21 Other Environmental Matters [APP-059]</b> , and set out in more detail at Section 3.5 of <b>WB8.4.21.1 Environmental Statement - ES</b>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			schemes will require when presenting their findings to the Secretary of State. (see 4.3.18)	<p><b>Addendum 21.1: Human Health and Wellbeing Effects [REP4-077].</b></p> <p>No request by a statutory body has been requested for a single, joint HIA across these Schemes, and it is the Applicant's position that this would be disproportionate.</p> <p>The Applicant also refers to its response to reference 7A-08 in <b>WB8.1.31 Applicant's Response to Deadline 4 and Deadline 4A Submissions [REP5-038].</b></p>
7A-12	Human Health and Wellbeing	PRoW	3.3.14 (including 3.3.15) There is little substance around these statements to make comments on significant effect. We suggested data needs to be interrogated and perhaps a deeper dive to challenge. Health is not only about desirability of public rights of way and recreational routes.	<p>Section 3.3 of <b>WB8.4.21.1 Environmental Statement - ES Addendum 21.1: Human Health and Wellbeing Effects [REP4-077]</b> provides signposting to the human health effects that are assessed in the Environmental Statement, which consist of hydrology flood risk and drainage, ground conditions and contamination, noise and vibration, air quality, socio-economic, tourism and recreation, waste and major accidents and disasters.</p> <p>The only significant effect therein identified was the health and wellbeing impacts from the Scheme directly relating to socio-economics, tourism and recreation. Specifically it relates to the adverse impact on long-distance recreational routes (Trent Valley Way and National Byways) as a result of</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				<p>impacts on their desirability and use from visual impacts, diversions and closures. This impact is temporary and is only experienced during construction of the Grid Connection Cable.</p> <p>The Applicant is confident that the assessment of health impacts is sufficient.</p>
7A-13	Human Health and Wellbeing	In-Combination Effects	<p>3.4.7 In combination effects "The only effects relating to human health and wellbeing are in-combination transport and access effects resulting from the carrying out of multiple Works packages of the Scheme. These in-combination effects impact upon the wellbeing of non-vehicular road users and public right of way users". Implying "angry" residents as a health issue demonstrates arrogance and a total lack of understanding around human health. Green spaces are important to the rural population, so destroying this has a negative impact, especially on mental health.</p>	<p>The Applicant seeks to clarify that paragraphs 3.4.7 <b>[REP4-077]</b> describes that recreational highway and PRow users may be affected in-combination by works from multiple parts of the Scheme (for example if walking, cycling, or horse riding around Ingleby, recreational highway users may encounter construction traffic from WB2 and the Cable Route).</p> <p>The Applicant has made no implication that this has any relation to ""angry" residents" and has considered the relevant receptors appropriately.</p>
7A-14	Human Health and Wellbeing	Health Impact Assessment-Construction	<p>5.1.4 "the only significant adverse effect to human health and wellbeing, which is short term and temporary moderate adverse effect to physical and mental health wellbeing is due to potential repeated closures of the Trent Valley Way and National Byways for cable laying and drilling works." They then say" the human health and impact does not outweigh the benefits the scheme is able to provide at a local and</p>	<p>The Applicant respectfully disagrees with this conclusion, and is confident that the assessment is proportionate to the likely health impacts as a result of the Scheme, and that the outcomes of the assessment are suitably evidenced. The Applicant refers to its response to reference 7A-02 above in this document.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>national level". If this is the only significant adverse effect on human health, then we think that a Health Impact Assessment is definitely required given the complexity required beyond the authors view to assess the impact of this scheme and others will have on our area. Besides, this is a biased view by an author who has no real depth and understanding of health issues other than those required around construction and decommissioning. Glint and Glare and EMF have been covered separately by 7000 acres.</p>	
7A-15	Human Health and Wellbeing	Employment	<p>3.5.13 7000 acres challenges the benefits of this scheme and others as potential enablers of health and wellbeing in relation to reducing deprivation, especially in Gainsborough by increasing access to employment and education. There is no detailed plan of how they intend to do this and we feel they do not understand the context of what this means considering they did not recognise initially the issues within Gainsborough town (see 7000 acres WR). We feel they are paying lip service to this and the applicant needs to be challenged by the examiners on how they intend to uplift this community. Their intention needs to be interrogated. There is a link between employment, education and health. However, we feel these schemes offer very little benefit as the intent is to bring in outside trained workers to build the schemes. That is why they have looked at the FTE GPs in the area. More data is required around this. They point</p>	<p>The Applicant considers the assessment of socio-economic impacts in the <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b> is robust and the mitigation measures outlined in section 18.8 are appropriate. These measures include the <b>WB7.10_A Outline Skills, Supply Chain and Employment Plan - Revision B (Clean) [EX6/WB7.10_B]</b> to support employment and education uplift in deprived areas, which is secured by way of Requirement 20 of Schedule 2 to the <b>draft DCO [EX6/WB3.1_G]</b>. This Requirement puts obligation on the Applicant to provide a full Skills, Supply Chain and Employment Plan that is "substantially in accordance with the outline"</p>



Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			out the loss of agricultural workers, however there is a supply chain to this that is local and regional which needs to be considered, so the knock-on effect is much greater. This may have a detrimental effect to those remaining farmers who themselves are vulnerable (protected characteristics).	version, and for the plan to be "implemented as approved" by the relevant planning authorities.  From the information provided in the submission, it is not clear what protected characteristics for the purposes of the Equality Act 2010 are being referred to. The Applicant submitted an Equality Impact Assessment with the DCO application [APP-321].
7A-16	Human Health and Wellbeing	BESS	4.2 BESS fires would only be a significant health risk if the battery units caught fire. More of a health protection risk with possible contamination of the soil and water courses. EMF is covered by a separate author.	The Applicant notes this comment.
7A-17	Human Health and Wellbeing	Landscape and Rural Area	4.2.4-8 West Lindsey District Council Green Strategy October 2012 report stated," that in 15 year's time, West Lindsey will be a place where there is a better-quality environment to make people healthier. It recognised that we are an important agricultural area that feeds the nation, and that the landscape, the built-up areas and the historic environment retains its unique character, and needs to be protected and enhanced to the benefit of all that being visitors, business and residence. It stated that we the people need to become greener in the way we live our lives! "	The Applicant refers to paragraphs 4.3.7-4.3.11 of <b>WB8.4.21.1 Environmental Statement - ES Addendum 21.1: Human Health and Wellbeing Effects [REP4-077]</b> , which sets out how landscape and visual impacts have been considered in their relationship to long-term health and wellbeing impacts.  The Applicant is confident that the Scheme does not disproportionately impact upon members of the population due to age (as a protected characteristic) as there are no significant effects

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>Older people move to rural areas to have good health in their later years, also to be financially secure, have good social connections and feel that their lives are meaningful and purposeful. Age is regarded as one of the protected characteristics. Green spaces are good for wellbeing. There are concerns these schemes will increase loneliness and isolation, and at worse fragment social networks as highlighted in our WR. The examiners are quite right to raise the issue around the change in landscape having a detrimental impact on the desirability of the locality to live well (given the local NHS ambition: Start well, Live well and Age well and soon to be published NHS Joint Plan 2023 -2028). This will have a negative impact on residential amenity and enjoyment where people live, which then has an effect on physical health and mental wellbeing. The argument that this will improve for subsequent generations does not hold. In 15 years, older people will not want to come to live here as there will be no benefits to rural living, especially to gain health. The positive impact of green space improving mental health is the key.</p> <p>The Examiner is right to challenge the methodology. We have covered these points earlier. Rural issues are very different to urban and this differentiation in the DCO and this addendum clearly demonstrates the deficiency in knowledge. There is a real risk that over the 60-year period this area could become a wasteland, especially if</p>	<p>from community severance, or impacts upon access to services.</p> <p>The Applicant refers to Agenda item 5b) of <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> which sets out some of the examples of how the Applicant has accounted for differences between rural and urban settings for assessing sensitivities to health impacts.</p> <p>Furthermore, the Scheme land must be operated and maintained in accordance with the <b>WB7.14_D Outline Operational Environmental Management Plan Revision D [REP5-020]</b>, and <b>WB7.3_D Outline Landscape and Ecological Management Plan - Revision D [REP4-045]</b>. These documents are secured by Requirement 14 and 7 respectively in Schedule 2 to the <b>dDCO [EX6/WB3.1_G]</b>.</p> <p>At the end of the operational life of the Scheme, the Scheme will be decommissioned. The requirement to decommission the Scheme is secured via requirement 21 in Schedule 2 to the <b>dDCO [EX6/WB3.1_G]</b>.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			new technologies in renewables become a reality. Imagine what this will present to health if this occurs. At best this could be a future major "health inequality"!	
7A-18	Human Health and Wellbeing	Assessment Methodology, Physical Health	4.3.1 "The Applicant is confident that physical health impacts from the Scheme have been suitably assessed through the individual ES topics described previously in this document". 7000 acres cannot agree with this statement as no Health Impact Assessment has been carried out as described earlier taking local issues into consideration using in depth local intelligence	The Applicant reaffirms its position and refers to its response to reference 7A-11 above in this document
7A-19	Human Health and Wellbeing	Agricultural Employment	4.3.6 The worst-case scenario approximately 17 FTE agricultural jobs will be lost. What will be the total loss for all the schemes and the knock-on effect for the suppliers and the agricultural sector as a whole when 13,000 acres in this area is lost to solar development. This has implications for health and wellbeing when you look at the cumulative effect, especially on the families affected. So, we question the authors statement that the likely impact will be low. "Employment" is a wider health determinant and this needs further evaluation.	<p>The Applicant notes this apparently references Cottam Solar Project [EN010133].</p> <p>Please refer to the Applicant's response to question 2.2.2 in <b>WB8.1.34 The Applicant's Response to ExA's Second Written Questions [REP5-039]</b>, and response to 7A-131 in <b>WB8.1.18 Response to Written Representations at Deadline 1 Part 2 [REP3-035]</b>.</p> <p>Paragraph 18.10.10 of <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b> identifies an estimated cumulative loss of 38 FTE agricultural jobs in the Local Impact Area, which amounts to 1.0% of the baseline agricultural employment. This results in a cumulative long-term moderate-minor</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				adverse effect. This is not a significant effect. The <b>Technical Note on Cumulative Effects of Additional Schemes [REP5-030]</b> confirms that there are no additional, or changes to significant cumulative effects relating to socio-economics, tourism and recreation.
7A-20	Human Health and Wellbeing	Assessment Methodology	4.3.7 "the Applicant is confident that the significance of assessed effects for operational effects has been sufficiently considered and that the long-term mental health and wellbeing effects from the Scheme are not significant". "The magnitude of the assessed long-term mental health and wellbeing impacts takes account of the potential for these to be permanent amongst some members of the population, whilst there is potential for this to reduce over time as peoples' perceptions of the Scheme change of its lifetime". "The assessment of mental health and wellbeing throughout the operational lifetime of the Scheme has had regard to the length of time over which the effects will occur". On what basis is this statement made, ONS data 2011? No qualitative survey has been carried out and nor has there been an attempt by the applicant to understand the mental health issues in this area e.g. the number of patients with depression or long-term mental health conditions. We raised concerns that depression rates are rising in the over 65's. Perhaps our local mental health trust as part of a Health Impact Assessment	<p>The Applicant refers to paragraphs 18.5.23-25 of <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b> which identifies prevalence of common mental disorders and disabilities among adults based on 2022 Office of Health Improvement and Disparities data. This is the same data used in the Lincolnshire and Nottinghamshire JSNAs.</p> <p>Please also refer to the response to HW-05 above in this document which sets out the local health trusts that were consulted at EIA Scoping and Section 42 consultation stage, and which responded to those consultations.</p> <p>The Applicant also refers to its response to reference 7A-11 above in this document.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			could contribute. We know that mental health in rural communities is a problem in Lincolnshire and that this is a concern.	
7A-21	Human Health and Wellbeing	Landscape and Rural Area	4.3.9 "an effect on personal perception of the landscape and its mental health and wellbeing value is dependent on subjective interpretation of the landscape as a whole and of individual views by an individual and collective set of receptors. Residual visual effects at the 15-year assessment point [REP2-052] are location specific and based on viewpoint". Has this been assessed by a recent independent qualitative survey? This statement is speculative and not evidence based through data collection. In 15 years' time, this area might be wasteland where no one wants to live because rural life is not appealing. If this statement was true, why do urban people like to get out into the rural areas? Green space helps to rejuvenate the soul, improving people's mental health. Ask the tourists who regularly use the Airbnb's in our area.	<p>The Applicant notes this apparently references Cottam Solar Project [EN010133].</p> <p>The statement made at paragraph 4.3.9 [REP4-077] is based on <b>6.2.8 Environmental Statement - Chapter 8 Landscape and Visual Impact Assessment [APP-046]</b> and its associated appendices (principally [REP1-058] and [REP1-059]) which has been undertaken by a suitably qualified Landscape and Visual Impacts expert.</p> <p>The Applicant is confident that the potential landscape and visual impacts of the Scheme have been suitably assessed and any pathway to health and wellbeing impacts (and to tourism) have been suitably and proportionately considered.</p> <p>The Applicant also refers to its response to reference 7A-18 in <b>WB8.1.31 The Applicant's Response to Deadline 4 and Deadline 4A Submissions [REP5-038]</b>.</p>
7A-22	Human Health and Wellbeing	Landscape and Rural Area	4.3.10 Landscape and the environment are wider deterrents of health, and this is important to a way of life in rural areas. Take this away, over time as stated previously, this creates "grief and loss", which then	Paragraph 4.3.10 should be read in context with the surrounding paragraphs 4.3.8-4.3.11 [REP4-077]. Paragraph 4.3.10 sets out the pathways of in-combination considerations towards individual and

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>turns into depression and anxiety with resultant long term mental health problems (long term mental health is a protective characteristic).</p>	<p>community amenity or sense of place, and thus the link between landscape impacts and health and wellbeing impacts. These paragraphs together set out the outcomes of these considerations, explaining the subjectivity of the response to changes in the landscape and visual environment, and why this therefore does not translate to a population health and wellbeing impact requiring further assessment in Section 21.5 of <b>6.2.21 ES Chapter 21 Other Environmental Matters [APP-059]</b>.</p>
7A-23	Human Health and Wellbeing	Health Impact Assessment	<p>4.3.11 "it was concluded that no express assessment of the mental health and wellbeing impacts would be required, as the likely effects would not be significant. Hence, the assessment of impacts upon individual and community amenity or sense of place was not included at Section 21.5 of C6.2.21 ES Chapter 21 Other Environmental Matters [APP-056]". In population health, it is a known fact that there is importance of "place" and that communities in which we live shape our health. This needs to be recognised, and in the case of rural settings, people choose to live there for the benefits the environment offers to their health and wellbeing. It is all about neighbourhoods and the social networks and connections on which rural people thrive. It's a way of life. Destroy this, and health will be affected (see 7000 acres WR report). Our biggest asset is the wide-open</p>	<p>The Applicant notes this apparently references Cottam Solar Project <b>[EN010133]</b>.</p> <p>To the extent it is referring to paragraph 4.3.11 of <b>WB8.4.21.1 Environmental Statement - ES Addendum 21.1: Human Health and Wellbeing Effects [REP4-077]</b>, the Applicant refers to its response to reference 7A-22 above in this document. The Applicant also refers to its response to reference 7A-11 above in this document. Section 2.9 of <b>WB8.1.18 Response to Written Representations at Deadline 1 Part 2 [REP3-035]</b>, in response to 7000 Acres' previous representation <b>[REP1A-015]</b>.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>spaces (countryside), and that should be respected. The role of communities in supporting good mental health is critical. Removing this way of life creates high level psychosocial stressors, which affect both physical and mental health, as well as the social fabric of our society. It might not be evident to all at the moment, however over time this has the potential to escalate. Therefore, we need a full Health Impact Assessment to be carried out particularly to look at the health outcomes over time.</p>	
7A-24	Human Health and Wellbeing	Mental Health and Wellbeing	<p>4.3.12 "Assessment of the impacts of the consultation and examination process have not been undertaken as it was not considered that these would have significant impacts on mental health and wellbeing". The applicant has admitted that the impacts have not been undertaken when it comes to mental health. "The Applicant considers that the level of consultation provided, including targeted consultation for residents most likely to be affected by visual changes to their setting, and the level of information produced about the Scheme, the DCO process, and how members of the public can engage, demonstrates that there has been a forthcoming in its approach to informing members of the public". 7000 acres believes the targeted area was not large enough to inform people of the consequences of this and other schemes. They should have gone well beyond those who are close to the schemes because as</p>	<p>The Applicant refers to its response to reference 7A-22 above in this document.</p> <p>The Applicant is confident that the level of consultation undertaken prior to the DCO Application being made is suitable as set out in <b>5.1 Consultation Report</b> and its appendices <b>[APP-022 to APP-037]</b>.</p> <p>The Applicant refers to Section 2.8 of <b>WB8.1.18 Response to Written Representations at Deadline 1 Part 2 [REP3-035]</b>, in response to 7000 Acres' previous representation <b>[REP1A-014]</b> on the <b>Equality Impact Assessment [APP-321]</b>.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>previously stated, "place" is important to our health. Just because you live in Gainsborough or Saxilby, does not mean that you will not be affected. People drive through the countryside, gain inspiration which helps their mental health. Villages and towns are inextricably linked to rural areas that surround them. "the Applicant considered that the responses issued to comments made by written and oral representations during the examination process have been accurate and informative to ensure that Interested Parties have enough information to make an informed judgement of the Scheme. the Applicant is confident that appropriate measures were made to ensure hard-to-reach groups". We disagree with this. 7000 acres has over 1000 members. Not all have participated in the process. Given this and all the schemes it is impossible to keep up with all the information to make an informed judgement, whether pro or against solar. That is why we have asked for qualitative surveys (independent of IGP/LANPRO) to understand how this and the other schemes will make us feel emotionally, physically and mentally. Regarding the hard to reach, we feel this has not been adequate (see above comments on this and the 7000 acres WR on the Equality Impact Assessment)</p>	
7A-25	Human Health	Mental Health and Wellbeing	4.3.13" In considering the mental health and wellbeing impacts of the pre-application and examination process, the level of significance of changes to different	Paragraph 4.3.13 <b>[REP4-077]</b> was written in response to comments made by interested parties making written representations to the



Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
	and Wellbeing		<p>sections of the affected communities will vary to a large degree. The level of awareness and involvement in the examination process may impact upon participants' mental health and wellbeing adversely through stress and focus on the most negative aspects of the Scheme, particularly for participants of multiple DCO examinations. Conversely, these participants may also be most informed of the process and thus less likely to suffer mental health and wellbeing impacts as a result". 7000acres finds this statement to be discriminatory and we would like this withdrawn with an apology. To state that those who participated through multiple DCO examinations focused on the negative aspect of the scheme, implying that these participants mental health and wellbeing were affected through stress from participating is quite ludicrous. It takes courage to get up and speak at open sessions. 7000 acres has over 1000 members, many have not been able to participate for various reasons, so a statement like this is quite insulting. This shows a lack of respect for the participants. For many people, due to commitments and daily life, they are not able to participate. It does not mean they do not share the same anxiety as the participants. That is why we have called for a Health Impact Assessment and qualitative independent surveys to refute this notion. We call on the examiners to challenge this.</p>	<p>examination. The representations referred to raise concern about the mental health implications of the DCO application and examination process itself and the number of DCO applications being made in the Till Valley Area, and across Lincolnshire more broadly. The Applicant has therefore based its assumptions on these oral and written representations about how the examination of the Scheme and other projects is affecting those interacting with it. The Applicant certainly did not intend to insult or disrespect any person based on oral presentations at hearings, nor on their ability to attend such events.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
7A-26	Human Health and Wellbeing	Health and Care Facility capacity	<p>4.3.14 "The effects to health and wellbeing on existing residents who have pre existing health conditions and therefore are more sensitive to changes to healthcare access are also not significant". An influx of say 2000 workers into this area for all the schemes is equivalent to one FTE General Practitioner. It does not take into account the extra staff required to service that practitioner. This needs discussion with the local NHS (Lincolnshire Integrated Care Board) who is responsible for General Practice provision. Access is particularly challenging at the moment, so any increase to GP lists is important to understand especially in the context of temporary resident patients. Also, to single out high users (pre-existing health conditions) is unfair as the NHS belongs to all. Other high use services are the Urgent Treatment Care facilities at both Gainsborough and Lincoln who really need to understand the impact of this influx. These facilities are run by the Community Trust. This is why one needs a Health Impact Assessment to understand how local services work. Potentially, this could impact on our already busy Acute service (United Lincolnshire Hospital Trust). Therefore, we disagree with the statement "that is not significant".</p>	<p>The Application refers to Section 18.10 of <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b> which sets out the assessment of cumulative effects on access to healthcare services. The assessment estimates a peak net employment uplift of 3,263 FTE employees in the year 2026 (para. 18.10.14 <b>[APP-056]</b>). The majority of these are expected to already be living, working, and accessing healthcare within the Local Impact Area, and therefore will not contribute an additional amount to requiring access to healthcare services.</p> <p>The cumulative assessed schemes are anticipated to generate a worst-case inward migration of 649 employees from outside the Local Impact Area (para. 18.10.15-16 <b>[APP-056]</b>) who would require additional access to healthcare services. This amounts to a temporary 0.3% increase in the population of the Local Impact Area (Bassetlaw and West Lindsey), which could induce a peak cumulative medium-term temporary minor adverse effect. Existing patients with pre-existing health conditions have been explicitly identified as they are more sensitive to impacts on access to healthcare.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
7A-27	Human Health and Wellbeing	Assessment methodology – Inequality and deprivation	4.3.15 “Where comments have been raised specifically regarding groups with known health or deprivation inequalities in the communities affected by the Scheme, the Applicant is confident that these inequalities have been sufficiently accounted for in the assessment of health and wellbeing impacts”. We disagree. No conversation has been had with the local Integrated Care System where there are experts on health inequalities. This is a very highly specialised area. A HEAT (Health Equity Assessment Tool) has not been carried out. This would be a requirement of a Health Impact Assessment. This tool identifies health inequalities for any project. Furthermore, the author was unaware of the NHS commitment to the Core20Plus5. This could be impacted by this and the other schemes with regards to health inequalities. A desktop review has not highlighted any of this so that the author cannot be confident that inequalities have been sufficiently accounted for. An example was referenced in the WR noise 7000 acres submission around partially sited people and exposure to solar scheme noise as they have heightened hearing (senses). See 7000 acres WR submission for other examples. They even state “that any vulnerable groups within the community are likely to be disproportionately impacted by the Scheme with regard to socio-economic impacts, direct physical health	<p>The Applicant furthermore reiterates that it is confident that the scope and detail of assessment is proportionate to the likely health impacts as a result of the Scheme, and that the outcomes of the assessment are suitably evidenced.</p> <p>The Applicant also refers to its response to reference 7A-05 in this document and 7A-17 in <b>WB8.1.31 The Applicant's Response to Deadline 4 and Deadline 4A Submissions [REP5-038]</b>.</p> <p>The Applicant would also like to clarify that the Office for Health Improvement and Disparities is one of the succeeding government bodies to Public Health England (as of 1<sup>st</sup> October 2022), and as such OHID Fingertips and PHE Fingertips refers to the same online resource. As such, this has been used in the determination of baseline health conditions in the Local Impact Area (see paragraphs 18.5.23-25 of <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b>).</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>impacts, nor at a greater risk of social isolation as a result of the Scheme". 7000 acres believe there is a real risk that vulnerable people will be impacted by the scheme. Our WR has given examples (Traveller Community, Military Veterans, Single parents, Learning disabled, the elderly , those with long term mental health problems, and of course farmers in the community because of the high suicidal risk in this group). A full Health Impact Assessment would identify if this was the case. NHS local data is essential "there are anticipated to be no significant effects to the health and wellbeing of vulnerable or isolated groups". This is an assumption which needs to be backed with hard evidence with deep dive data and local intelligence. There is a huge data source available for reference that can be used by people outside the NHS e.g PHE fingertips.</p>	
7A-28	Human Health and Wellbeing	Assessment Methodology	<p>4.3.16 "The Applicant confirms no additional consultation was undertaken as it was considered that the comments received were sufficient to be able to undertake the human health assessment in accordance with the Scoping Opinion. No request for a Health Impact Assessment was made prior to the application of this DCO, nor has the scope and methodology of the human health assessment thereafter been called into question by a local authority or statutory body for health". 7000 acres have always advocated that the</p>	<p>The Applicant reiterates that it is confident that the agreed scope and detail of assessment is proportionate to the likely health impacts as a result of the Scheme, and that the outcomes of the assessment are suitably evidenced.</p> <p>The Applicant also refers to its response to reference 7A-08 above in this document.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>applicant should have produced a Health Impact Assessment. The applicant has stated that no Health Impact Assessment was made prior to the application for this DCO, nor was the scope and methodology of the human health assessment thereafter been called into question by the local authority and statutory body for health. How can anyone doing a desktop review understand the local issues without gathering local intelligence data form the local sources. Specialists in the field of population health management, those with expertise on health outcomes and health inequalities are best placed to provide opinions. The cumulative impact is our primary concern. The Local Authority is now grappling with many applications in our area and maybe this changes things for them.</p> <p>"The Applicant is confident that the scope and methodology of the human health and wellbeing assessment undertaken has sufficiently addressed concerns raised during the pre-application process, and that any comments raised during the examination process have been adequately responded to". 7000 acres has always disagreed with the methodology as this has been weak. Much of the methodology has been written referenced more towards an urban slant than rural. They have not used well recognised approaches such as the WHIASU framework nor the well-recognised Public Health England document "Health Impact</p>	

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>Assessment in spatial planning: A guide for local authority public health and planning teams”, October 2020. The document still has a slant towards a more urban environment. This document does give a flow chart and advice on whether or not a Health Impact Assessment should be carried out. The IEMA Guidance was referenced and we have provided a separate document Additional Comment. Given the scale of all the schemes, and the fact that there are huge gaps within this assessment, framing what is required of an applicant around health issues is significant. This requires critical analysis of the data through a deep dive, using the local statutory bodies such as Public Health Lincolnshire, the local NHS and other local organisations such as MIND, Age UK and the Institute of Rural Health which is based at the Lincolnshire University. This could have provided in depth data to form an opinion beyond the desktop review done by LANPRO, especially local issues. The LANPRO literature research was poor, with only three references to census data and one to the Health and Social Care Act 2012. They also referenced the Corringham Neighbourhood Plan which in no way sets out the health issues for this area. 7000 acres is requesting a specific hearing on health as well as a Health Impact Assessment be completed across all of the schemes so as to minimise negative and maximise the positive health impacts so</p>	

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			as to reduce health inequalities which should become evident as these schemes materialise. The local Joint Strategic Needs Assessment and the local plans of both the Trent and IMP Primary Care Networks are critical to health moving forward in this area.	
7A-29	Human Health and Wellbeing	Additional Comments	4.3.17 Please note the Additional Comments document where 7000 Acres has appraised the Guidance documents against the assessments made within the following documents: Human Health and Wellbeing Environmental Statement Chapter 18: Socio-Economics and Tourism and Recreation EN010132/ APP/WB6.2.18 and the Environmental Statement Chapter 21: Other Environmental Matters EN010132 APP/WB6.2.21 as well as the document: Response to the Environmental Statement ES Addendum 21.1: Human Health and Wellbeing effects.	Please refer to the responses to 7A-31 to 7A-53 below.
7A-30	Human Health and Wellbeing	Cumulative effects, Health Impact Assessment	4.3.18 The cumulative effect warrants a full Health Impact Assessment	The Applicant refers to its response to reference 7A-11 above in this document.

**7000 Acres [REP5-050] – Additional Comments – Appraised West Burton EIA and Health Addendum as per the Institute of Environmental Management and Assessment (IEMA) guidelines**

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
7A-31	General	Professional Competence of Applicant Team	The applicant made reference to the Institute of Environmental Management and Assessment (IEMA) Guides during the Issue Specific Hearing 4 (ISH4) West Burton Examination. 7000 Acres has read the relevant guidance and would like to make comment referencing both Cottam and West Burton Environmental Impact Assessments in producing the Human Health and Wellbeing content within the Socio-economic section, both of which were prepared by LANPRO as well as the Addendum document. This might be useful for the examiners to understand the lack of content provided by the applicant in relation to this important subject, which 7000 Acres believes has been written by a Town Planner and not an expert in this field. We believe a desktop review is not satisfactory, as this does not reflect the local Lincolnshire issues for this area, particularly as this is a major development which will have an impact for sixty years. 7000 Acres also feels that the lawyer for the applicant who passed a comment on this at the special hearing does not have sufficient knowledge or expertise in matters of health to make such an assessment.	<p>The Applicant refers to its response to reference 7A-02 above in this document.</p> <p>The Applicant furthermore reiterates that it is confident that the agreed scope and detail of assessment is proportionate to the likely health impacts as a result of the Scheme, and that the outcomes of the assessment are suitably evidenced.</p>



Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
7A-32	Health and Wellbeing	Consultation with Public Health Bodies	The guidance advises early engagement with health professionals on screening and scoping to scrutinise and agree the population and health scope. They advise this needs to be proportionate and compliant and advise the use of a health professional to define health related significance by involving health stakeholders. In the scoping document referenced, they recommend the Director of Public Health for the relevant local authority, in this case Professor Derek Ward who is the Lincolnshire Director of Public Health. They also advise the relevant local Integrated Care Systems representatives (Lincolnshire Integrated Care Partnership and Board), the Acute, Mental and Community Trusts (United Lincolnshire Hospital Trust, Lincolnshire Partnership Foundation Trust, and the Lincolnshire Community Health Services). All these agencies have specialists including data analysts who could provide population-based statistics which would be relevant to the EIA assessment on human health and wellbeing.	The Applicant refers to the response to reference HW-05 above in this document which sets out the statutory and non-statutory health bodies that were consulted at EIA Scoping and Section 42 consultation stage, and which responded to those consultations.
7A-33	Health and Wellbeing	Scope of Assessment	The guidance gives clear advice as to what is required in the EIA scope. It states clearly that it is good practice to complete a Health Impact Assessment, especially for major developments. As these schemes require complex proposals and that population and human health factors should be factored in, the EIA format of including only human receptors in relation to air or	With regard to the requirement for a HIA, please refer to the Applicant's response to question 2.6.5 in <b>WB8.1.34 The Applicant's Response to ExA's Second Written Questions [REP5-039]</b> .

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>water quality and noise or light disturbance misses this important fact. The socio-economic chapter should typically include the implications on public services (includes health services), education and employment</p> <p>The guidance is clear around outcome measures and is clear on the competencies required to conduct such an assessment. Interpreting and understanding the determinants of health wellbeing in the context of populations is essential, especially in the context of a rural development. By focusing in the EIA on biophysical issues related to environmental hazards and health protection, the authors fail to consider what are the real issues facing populations with regards to human health and outcomes, and therefore are unable to identify the resultant health inequalities. This is evident from the LANPRO produced health documents including the Equality Impact Assessment. They point out, Public Health is a specialty. Health Impact Assessments identify the health impacts of a scheme.</p>	<p>In relation to health determinants, the Applicant also refers to its response 7A-05 above in this document.</p> <p>The Applicant is confident that the assessment of human health and wellbeing impacts from the Scheme has been undertaken in accordance with IEMA guidance.</p>
7A-34	Health and Wellbeing	Assessment Methodology	<p>The guidance document states that the significance of an effect is usually a matter of expert professional judgement and that this should be informed by references to evidence based and practitioner guidance. Desktop research only scratches the surface and does not do justice to population health and the impacts their scheme would have on communities and the wider system. Furthermore, the applicant provided</p>	<p>The Applicant is confident that the assessment of human health and wellbeing impacts from the Scheme has been undertaken in accordance with IEMA guidance:</p> <ul style="list-style-type: none"> <li>• Effective Scoping of Human Health in Environmental Impact Assessment (2022); and</li> </ul>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>very little research evidence around human health to, evidence within their EIA, including their Addendum document. This is required to reach robust and evidence-based conclusions. Local Public Health and Integrated Care Services involvement is imperative to ensure data is interpreted correctly, population health needs and outcomes are not affected and that schemes like this could affect health inequalities as well as impact local NHS and Public Health initiatives. This is a major gap within the EIA document by the author. Would their scheme have the potential to widen health inequalities within this group (population based)? Rural population health is very different to urban.</p>	<ul style="list-style-type: none"> <li>Determining Significance For Human Health In Environmental Impact Assessment.</li> </ul>
7A-35	Health and Wellbeing	Health Inequalities	<p>Population health significance should reflect the potential for widening or narrowing health inequalities between defined populations and relevant sub population groups. An example would be vulnerable groups such as the elderly of which there is a higher proportion living in our rural communities. The subgroup would be those with for example dementia. In the EIA there is not much on population level effects, neither positive nor negative.</p>	<p>The Applicant refers to its response to 7A-34 above in this document.</p>
7A-36	Health and Wellbeing	Assessment of Significant Effects	<p>The guidance is clear that both major and moderate effects are to be considered significant. If that is the case, appropriate evidence and justification is required. This is rarely demonstrated in their EIA especially</p>	<p>The Applicant refers to its response to 7A-34 above in this document.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			around mental health and its relationship to physical health and social cohesion within communities. We advocate and are in support of the guidance as to expert judgement by professionals in understanding these potential impacts this scheme may have. This sixty-year scheme will have an effect and this clearly needs to be evaluated in the appropriate way by both quantitative and qualitative data plus expert guidance framed for examiners to make an informed opinion.	
7A-37	Health and Wellbeing	Assessment of mental health	The guidance clearly states that parity should be given to both physical and mental health across the analysis of bio-physical, social, behavioural, economic, and institutional influences on population health outcomes. 7000 acres has always stated that there has not been much emphasis in the applicants EIA document on physical health, nor a clear understanding how their scheme and the others will impact on mental health within our communities. The author did attempt this in the response to key and outstanding comments on human health and wellbeing in the Addendum document paragraph 4.3. We have submitted our comments in the 7000 Acres response to the Addendum.	The Applicant refers to its response to 7A-34 above in this document.  The Applicant has responded to 7000 Acres comments in respect of <b>WB8.4.21.1 Environmental Statement - ES Addendum 21.1: Human Health and Wellbeing Effects [REP4-077]</b> at 7A-02 to 7A-30 above.
7A-38	Health and Wellbeing	Health inequalities in older	We raised the issue of depression increasing in the 65 year plus group. This needs to be understood in the context of rural communities. Pensioners choose to live	The Applicant refers to its responses to 7A-17 and 7A-34 above in this document.

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
		population groups	in rural areas to gain benefit from the open spaces and rural life. Many are living on their own. Those with cancer who live in rural areas are already at a disadvantage. These sub group populations need further evaluation to ensure health inequalities are not widened further.	
7A-39	Health and Wellbeing	Mitigation	The guidance states that significant conclusions should not take into account unsecured mitigation. This guidance advises that it should include a qualitative statement indicating the expected effect. 7000 Acres have called for an independent qualitative survey on a population well informed on the issues, which is non-biased. This should extend beyond the 500-metre buffer.	<p>Assessments of health impacts are made on the basis of embedded mitigation, or additional mitigation as secured by the management plans set out in the Requirements in Schedule 2 of the <b>dDCO [EX6/WB3.1_G]</b>.</p> <p>The Applicant also reiterates (as stated during agenda item 5 at the <b>Issue Specific Hearing 4 [REP4-071]</b>) that the 500m buffer is only in respect of health impacts arising from noise and air quality effects. All other health impacts are assessed at a wider level as determined by the technical chapter they relate to, or in the Local Impact Area as a whole.</p>
7A-40	Health and Wellbeing	In-combination effects	In combination effects are the intra project effects. The guidance states clearly that the applicant needs to collate the effects identified for each determinant of health by populations or sub-populations. They are required to make a list of relevant determinants of health and their level of effect. This covers age, sex, and constitutional factors, individual lifestyle factors, social	<p>The Applicant refers to its response to 7A-34 above in this document.</p> <p>For clarity, the Applicant has determined the population as the entire population of the Local Impact Area, and has identified sub-populations as population groups that have been identified as</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>and community networks and finally general socio-economic, cultural and environmental conditions. In the applicant's Document 21.1 Environmental Statement Addendum: Human Health and Wellbeing effects (Cottam January 2024; West Burton February 2024) Paragraph 3.4, the author does not seem to have grasped what is required. He concentrates on Hydrology Flood Risk, Ground Conditions and Contamination, Noise and Vibration, Glint and Glare, Air Quality, Socio-economic, Tourism, Recreation, Waste and finally other Environmental factors. This should all be described in terms of population and sub populations e.g the population would be those over 65 years of age, a sub population could be carers. 7000 Acres has made reference to this within their Written Representation. Evidence suggests that in rural settings, loneliness and isolation is increasing. Understanding sub population data is important to identify, as the scheme itself may widen health inequalities and may lead over time to poorer health outcomes for that group. 7000 Acres feels the author has failed to understand the guidance. Importantly, what is the mitigation offer?</p>	<p>being more susceptible to changes to due health characteristics (such as those with long-term health problems).</p> <p>Glint and glare and socio-economic, tourism and recreational impacts were the only areas identified with additional in-combination effects, none of which were assessed as significant.</p>
7A-41	Health and Wellbeing	Cumulative effects	<p>The guidance describes the cumulative effects as the inter project effect (referenced against 2.1.2 of the ExQ2). They advise that this should be determined (raised in the Addendum which was requested). The</p>	<p>The Applicant refers to its responses to 7A-17 and 7A-34 above in this document.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>guidance states "the magnitude should be appraised in the light of the combined effect, and that this should provide a combined level of effect to reflect the likely implications for public health". Again, this is assessed as above without taking into account populations and sub populations using the determinants of health. Island Green Power have two schemes in our area not considered as one, which should have been the case (they describe their schemes as such in the cumulative effect as separate schemes (see paragraph 3.5.1 in both documents). This is absurd as both schemes have an incremental impact. They reference "Professional judgement has been applied to determine the Zone of Influence for each ES topic". Had a health professional been involved, there would be a clear understanding around the element of population health and the impact. Sadly, the author has failed to realise the population link within these schemes.</p>	
7A-42	Health and Wellbeing	Cumulative effects	<p>The guidance is clear, the combined public health effect is where is where a population is affected by multiple determinants of health and a large proportion of the same individuals within that population experience the combination effect e.g lifestyle, community and activities due to large scale change. This should differentiate urban from rural e.g high level of retired pensioners who out of choice move into rural areas for health gain and lifestyle, join walking groups and rural</p>	<p>The Applicant refers to its responses to 7A-17 and 7A-34 above in this document.</p> <p>The NHS Lincolnshire Joint Forward Plan 2023-2028 was published by NHS Lincolnshire Integrated Care Board (ICB) on 2 April 2024. The Applicant has no record of being invited to comment on the preparation of this document.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			community groups for wellbeing. This group benefit from green open spaces, some for mental health reasons such as military veterans, who perhaps have post-traumatic stress disorder, who when their natural environment is altered at scale will worsen their health outcomes due to deterioration in physical health. This will increase our rural depression rates which are projected to increase, therefore a poor outcome. This needs to be determined and should be factored in when considering the Lincolnshire Joint Forward Plan.	The Applicant understands this document is primarily focussed on the strategic delivery of NHS services in Lincolnshire. The Applicant does not consider that the Scheme significantly impacts upon the ICB's ability to deliver such services.
7A-43	Health and Wellbeing	Cumulative effects	The guide is clear that whoever scopes the EIA should be a practitioner of health and the practice should reflect this role. This should be part of the public health endeavour. We understand the author of the LANPRO document on socio-economics, which includes Health and Wellbeing, was a Town Planner. We have highlighted the deficiencies within the EIA document and the Addendum.	<p>The Applicant refers to the response to HW-05 above in this document which sets out the statutory and non-statutory health bodies that were consulted at EIA Scoping and Section 42 consultation stage, and which responded to those consultations.</p> <p>The Applicant refers to its responses to 7A-02 and 7A-34 above in this document.</p> <p>The Applicant has responded to 7000 Acres comments in respect of <b>WB8.4.21.1 Environmental Statement - ES Addendum 21.1: Human Health and Wellbeing Effects [REP4-077]</b> at 7A-02 to 7A-30 above.</p>



Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
7A-44	Health and Wellbeing	Description of direct and indirect effects	Key guidance states that the applicant should describe direct and indirect significant effects. They should also provide a description of forecasting methods. 7000 acres finds very little around this within their documents.	The Applicant refers to its response to 7A-34 above in this document. <b>Chapter 2 EIA Process and Methodology [APP-040]</b> outlines how future baselines are determined, which is adopted in the topic specific chapters. Indirect impacts are also assessed in these chapters, for example, see paragraphs 18.4.8 and 18.4.12 of <b>6.2.18 Environmental Statement - Chapter 18 Socio Economics Tourism and Recreation [APP-056]</b> and paragraphs 9.7.14, 9.7.22, 9.7.23 and 9.7.66 of <b>6.2.9 Environmental Statement - Chapter 9 Ecology and Biodiversity [APP-047]</b> .
7A-45	Health and Wellbeing	Assessment Scope and Methodology	The applicant should describe "what are the relevant health issues that are likely and those that will have the potential to significantly affect population health?" 7000 Acres have demonstrated issues in the applicant's documents to demonstrate that they have little knowledge and understanding around population health. In particular, their scope should have differentiated between rural and urban health, which would have demonstrated an understanding of health issues relevant to both. This must take into account the local issues with evidence provided.	The Applicant refers to its responses to 7A-17 and 7A-34 above in this document.
7A-46	Health and Wellbeing	Health Outcomes and Governance	In the health section, we do not see the Governance arrangements set out especially around decision making and probity. The applicants should have	The Applicant refers to its response 7A-34 above in this document.

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>requested an outside source to complete the EIA on Human Health and Wellbeing (that includes the Equality Impact Assessment). A Health Impact Assessment seeks to inform and enhance the decision-making progress, and hence good Governance would recognise this and would want to mitigate against impacts to ensure improvement in health and health equity. This is important in the context of the guide, which states the objective of the EIA is to ensure a high level of protection of the environment and of human health. The guide recommends that a steering group be formed to formalise the Governance of health stakeholder inputs and consensus building. Was this done? If so, this should be documented and be transparent in the EIA, especially to avoid areas such as conflict of interest and issues around probity. The applicant has not demonstrated any ethical considerations within their EIA around health. 7000 Acres would like clarity around this.</p>	
7A-47	Health and Wellbeing	EIA Scoping	<p>The guide states that wider determinants of health approach should be determined by EIA scoping. 7000 acres would have liked to have seen this approach particularly around population health. The guidance suggests a separate Annex for this. This would ensure population groups are also listed to support identifying gaps where there is the potential for significant health inequalities. The guide talks about the health pathways</p>	<p>The Applicant refers to its response 7A-34 above in this document</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			being complex with health outcomes affected by multiple determinants. This is significantly lacking in their supporting documents.	
7A-48	Health and Wellbeing	Consultation	They advise the pre application should be discussed with Public Health. 7000 acres has asked for further clarity around this.	<p>The Applicant refers to the response to reference HW-05 above in this document which sets out the statutory and non-statutory health bodies that were consulted at EIA Scoping and Section 42 consultation stage, and which responded to those consultations.</p> <p>In addition, the following non-prescribed consultees were consulted at Section 42 statutory consultation (Table 5.10.4 of <b>5.10 Consultation Report - Appendix 5.10 - Section 42 Consultation Materials [APP-034]</b>):</p> <ul style="list-style-type: none"> <li>• Age UK Lincolnshire and South Lincolnshire</li> <li>• Age UK Nottingham and Nottinghamshire</li> <li>• Lincolnshire Deaf Association</li> <li>• Nottingham Deaf Society</li> <li>• Lincolnshire Autistic Society</li> <li>• Autistic Nottingham</li> <li>• Disability Nottinghamshire</li> <li>• Lincoln and Lindsey Blind Society</li> </ul>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				<ul style="list-style-type: none"> <li>Lincolnshire Traveller Initiative Health and Safety Executive</li> </ul> <p>Those who responded to the Section 42 statutory consultation, their comments in full, and the Applicant's response to their comments, are set out in <b>5.13 Consultation Report - Appendix 5.13 - Section 42 Applicant Response [APP-037]</b>:</p> <ul style="list-style-type: none"> <li>Autistic Nottingham</li> </ul>
7A-49	Health and Wellbeing	EIA Scoping	Again, the guide states that the applicant should look for the likely and potential significant effects to human receptors, community amenities or services with likely and potential significant population health implications. A good example again is the provision of care, issues around loneliness and isolation in the over 65-year group.	The Applicant refers to its response 7A-34 above in this document.
7A-50	Health and Wellbeing	Assessment Outcomes and Mitigation	We have highlighted the importance of the application addressing health outcomes which should be identified, whether positive or negative. Health experts would be needed to address these. The aim is to improve population health and reduce inequalities. 7000 Acres does not see anything in their documents to mitigate against the mental health impact.	The Applicant refers to its response 7A-34 above in this document. The impacts of the Scheme to human health have been assessed in <b>6.2.21 Environmental Statement - Chapter 21 Other Environmental Matters [APP-059]</b> and <b>Environmental Statement Addendum 21.1: Human Health and Wellbeing Effects [REP44-077]</b> .

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
7A-51	Health and Wellbeing	Statements of Common Ground	7000 Acres has not seen a formal statement of common ground with public health stakeholders (this should include the Integrated Services). If so, why is this not within the applicants Health documents within the EIA?	The Applicant confirms no Statement of Common Ground with any statutory public health stakeholders has been undertaken, as none have been requested by relevant statutory bodies, nor by the Examining Authority.
7A-52	Health and Wellbeing	Data Sources	The guide states that the data sources should target health outcomes and health indicators. The applicant's documents around data were not satisfactory as they failed to do deep dives beyond the desktop review and interrogate the data with experts in health, such as the local sources as discussed previously. In fact, the applicant's author did not feel using Quality Outcomes Data was relevant. This data is a health indicator.	The Applicant refers to its response 7A-34 above in this document.
7A-53	Health and Wellbeing	Consultation	As far as 7000 Acres is aware, there was no specific engagement with the community on health and wellbeing issues.	The Applicant confirms that any community engagement on matters of health and wellbeing were integrated with other technical topics rather than as a standalone topic.

### 3.3 Submissions by Parish Councils and Statutory Bodies

#### Historic England [REP5-057]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
HEng-01	Cultural Heritage	Scheduled Ancient Monument	<p>Key points made by Historic England in ISH5</p> <ol style="list-style-type: none"> <li>1) Policy does not differentiate between harm to an asset caused by direct physical action and setting impacts both are potential sources of harm, which can be less than substantial or substantial.</li> <li>2) Substantial Harm to the significance of a Scheduled Monument can be caused by setting impacts upon its significance.</li> <li>3) The harm at Stow Park is substantial.</li> <li>4) The significance of The medieval bishop's palace and deer park, Stow Park as a bounded architectural space can still be experienced as a whole despite the dissection by the railway, one can appreciate and understand the park kinetically from the Palace moving through the park southwards over the railway via the modern bridge</li> </ol>	<p>The Applicant refers to their response to reference HE-06 above in in section 2.7 of this document.</p> <p>The Applicant respectfully disagrees that the harm at Stow Park is substantial and refers to the <b>Stow Park Cultural Heritage Position Statement [REP5-027]</b>, which details the composition of the Scheduled Monument and the contribution made by setting to its significance with consideration to the Historic England Official List Entry, the Applicant's justification for their conclusion that the level of harm is less than substantial harm, as well as the policy tests that are relevant to the DCO application and the proposed development within the former Stow Park deer park area.</p>

### Marine Management Organisation [REP5-060]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
MMO-01	Draft Development Consent Order	Protective Provisions	The MMO has received no questions or comments regarding submissions made in Deadline 4 and in turn have no comments to provide for Deadline 5. 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.

### Canal & River Trust [REP5-054]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
CRT-01	The Scheme	Order Limits	<p>We have examined the Examining Authority Second Questions and the Deadline 4 and 4a documents and wish to make the following comments:</p> <p><i>Land South of Marton Grid Connection Options Report</i></p> <p>The applicants Deadline 4 Submission WB2.2C Land Plan - Revision C does not result in any changes to the site area and we therefore conclude that the applicant has resolved that a change in the site area is not necessary in this location, as was the case for the Cottam Solar Project.</p>	<p>The Applicant confirms that the conclusion of the Land South of Marton Grid Connection Options Report [REP2-009] was that no change to the Order limits were necessary in the locations analysed within the report.</p> <p>For separate reasons, an alteration to the visibility splay in the vicinity of the locations featured in the Grid Connection Options Report [REP2-009] was applied for as a part of the change request application submitted on 19 January 2024. This was because a review of the construction access points to ensure coordination with the access points for the Gate</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				Burton Energy Park and Cottam Solar Project indicated that construction access AC110 required a longer visibility splay to the north. Details of the visibility splay change can be found in Section 3.5 of WB9.2 Change Application and Consultation Report <b>[AS-056]</b> and can be seen on a plan in Appendix 1 of the same document.
CRT-02	Option Agreement	Option Agreement	<p><i>Land Agreement</i></p> <p>The parties continue to negotiate the agreement for the rights required for the project in respect of the cable dredging tip (parcel 07-121). We are confident agreement will be reached prior to the end of the Examination.</p>	The Applicant notes this comment.
CRT-03	Crossing Schedule	HDD	<p><i>Crossing Schedule</i></p> <p>We note that the applicants Deadline 4 Submission - WB7.15B Crossing Schedule - Revision B includes revisions to the use of HDD in proximity to the southwest corner of the Trusts western dredging tip, with the note that "Proposed HDD under River Trent to extend until west of flood defences" and include HDD beneath hedgerow H148 and the seasonally wet ditch.</p>	The Applicant notes this comment.
CRT-04	Crossing Schedule	HDD	<p><i>Technical Note on HDD and cabling under the River Trent</i></p> <p>We note the production of this document to aid the Marine Management Organisation (the MMO) and our</p>	The Applicant notes this comment.



Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			inclusion in this document at paragraph 2.2.8 with regards to the depth of the drill beneath the River Trent.	
CRT-05	Cumulative Impact	Joint Interrelationships Report	<p><i>Joint Report on Interrelationships</i></p> <p>We note that Appendix A of the Joint Report on Interrelationships between Nationally Significant Infrastructure Projects the entry dated 10/08/23 has been amended.</p>	The latest version of the Joint Interrelationship Report is submitted at Deadline 6 <b>[EX6/WB8.1.9_D]</b> .

### Brampton Parish Village Meeting [REP5-052]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
BPVM-01	Principle of Development Soils and Agriculture Alternatives and Design Evolution Ecology and Biodiversity Other Environmental Matters	Location and scale of the Scheme Food Security	<p>I want to echo the comments I have submitted in the past, in the light of the further expansion of this project. Our village is located close to the proposed NI project. It will impact on every property in our village and on the the golf club which is located adjacent to our village.</p> <p>The project is simply too large for a small rural community - it will dominate the area for decades to come.</p> <p>We are particularly concerned about the impact of such a large development will have on food security, in a country that already cannot produce enough</p>	Please refer to the Applicant's response to BVPM-02 to BVPM-05 in <b>WB8.1.2 The Applicants Response to Relevant Representations [REP1-050]</b> . The Applicant has undertaken a detailed assessment of the impacts of the Scheme, which are set out in the <b>Environmental Statement [APP-038 to APP-061, REP1-012, REP3-010]</b> .

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
	(Human Health)		<p>food for our population - this cannot be supplemented elsewhere.</p> <p>The impact on wildlife and bio-diversity remains a question without convincing mitigating answers. This in a country that has already suffered one of the most significant reductions in bio-diversity in Europe.</p> <p>Thirdly, the personal impact on our village mirrors the negative impact that will be suffered across West Lyndsey. Mental health issues are a real risk; house values may well suffer a negative impact; access to the countryside as an amenity will suffer, changing from a green rural landscape to a black industrial landscape.</p> <p>The only logical reason to pursue this line of development is the location of two redundant power stations, giving ready access to the national grid. It appears that all other impacts and arguments have been collected and completely disregarded.</p> <p>The consultation process is a sham - set up to ensure process is followed, but as a national project, and contrary opinions serve no purpose. There is no sense of an actual democratic process. I am appalled.</p>	

**Cadent Gas Limited [REP5-053]**

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
CG-01	Draft Development Consent Order	Protective Provisions	<p>We act on behalf of Cadent Gas Limited ("Cadent") in relation to the application for the West Burton Solar Project Development Consent Order (the "Application").</p> <p>We write to provide an update on behalf of Cadent.</p> <p>Cadent has previously submitted both a Relevant Representation (RR-032) and a Written Representation (REP1A-028) in this matter.</p> <p>With reference to the content of those previous submissions, we note that commercial terms between the Applicant and Cadent have been agreed, and that these have now been formalised by way of a completed agreement. There is no disagreement regarding the protective provisions benefitting Cadent, and provided they are included on the face of the Order when made, Cadent has no outstanding concerns. Please accept this letter as Cadent's formal notice of the withdrawal of their existing representations regarding the Application.</p> <p>For the avoidance of any doubt, the Examining Authority should place no weight on any of the withdrawn representations.</p>	The Applicant notes this comment and confirms that agreement has been reached with Cadent.



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

#### Katherine Powell [REP5-074]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
KP-01	Cumulative Impact	Cumulative	I have great concerns over the size of the proposed plan not only the physical size of the panels themselves but also the amount of them especially with the other 3 proposed solar farms being so close in proximity it will feel almost claustrophobic the amount of them. I am concerned what it will look like and how it will affect local wildlife that will no longer have access to these areas. It seems strange that they are going to be taking away agricultural land where we can grow food for the whole country especially at a time when we are having problems sourcing and importing food from abroad. I think we should be spending more time insisting that new housing developments put solar panels on their roofs rather than taking away agricultural land.	Please refer to the Applicant's response to 7A-01 in <b>WB8.1.31 The Applicant's Response to Deadline 4 and Deadline 4A Submissions [REP5-038]</b> .

#### Richard Anthony Farley [REP5-080]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
RF-01		Cumulative Solar efficiency Skills and Supply Chain	Hello, Hello is anybody listening?  I am extremely concerned that the West Burton solar energy development and indeed along with all the other similar proposals, are not being considered in a fair and pragmatic way. The process doesn't appear to give any	Please refer to the Applicant's response to 7A-01 in <b>WB8.1.31 The Applicant's Response to Deadline 4 and Deadline 4A Submissions [REP5-038]</b> on cumulative development.

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>appreciation or understanding of what impact all these projects will have on our countryside and their associated local communities. The local population is not being adequately served by these planning hearings and their views are not being sufficiently considered. It is all too complicated and far too extensive given that the planning processes for all these individual projects, which are at different stages, are being considered concurrently. It is virtually impossible to keep abreast of all the proceedings. However I suspect this is intentional in the vain attempt to minimise objections.</p> <p>The planning process for such massive developments should be with consent NOT imposition. As it stands, it is forcing local communities to rally around themselves in an attempt to defend their historic way of life against the onslaught of moneyed big business supported by all their representation. Frankly it is reprehensible that they are considering such far reaching proposals to people's lives in such a cavalier fashion.</p> <p>We have now arrived at a situation where the overall density of the proposals for Tillbridge, Gate Burton, West Burton and Cottam 1, within our immediate area, appears to be approaching 50% coverage of the overall landscape. This is scandalous when there is clearly such an overwhelming objection to the proposals. After all there are far more suitable alternatives to achieve this</p>	<p>Please refer to the Applicant's response to ALT-02 on efficiency of solar and GEN-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>Nations drive to zero emissions than destroying 15,000 acres of fertile farmland, and which should continue to be employed for providing food for the nation.</p> <p>When will the Government wake up and realise that generating solar energy at this latitude is just one big con. a money making exercise. The companies blatantly shout about their schemes providing energy for say 200,000 homes, yet whilst this may be achievable for perhaps a few days in midsummer, what will they generate in the middle of winter or even most of the year? Why can't we see some power outputs from existing solar farms before carpeting vast swathes of agricultural green belt and creating industrial deserts.</p> <p>Finally and very topically unlike other sources of renewable energy which are advantageous to our economy, solar energy will only benefit the Chinese since we totally reliant on them for the importation of solar apparatus. Seemingly they have the monopoly owing to their access to certain raw materials and the fact that much of it is also manufactured utilising the Uygur population as forced labour. This also comes at a time when our relationship with China is somewhat stretched through malicious Cyber activity so it would be even more disastrous to shackle ourselves with an ongoing commitment to solar energy.</p>	

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			Whilst I fully appreciate the attractiveness of the existing grid connections, due cognisance must be given to the impact and damage these proposals will have on local communities some of which have existed for a 1000 years. Our village Brampton is even mention in the Domesday book!	

**Richard Whiting [REP5-081]**

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
RW-01	Site Selection	Rooftops	there appears to be no consideration being made to local communities regarding this vast network of solar panels. Our village of Brampton and the area near us will be completely surrounded by these unacceptable panels, destroying farmland and the countryside. There must be better uses on industrial and commercial buildings without destroying our countryside	The Applicant refers to their previous responses in relation to alternative sites for solar installation at ALT-01 in <b>WB8.1.19 Response to Written Representations at Deadline 1 Part 3 [REP3-036]</b> .

**Dr Terence David Organ [REP5-069]**

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
TDO-01	Soils and Agriculture	Food Security	In the news this week we have been told that food prices will rise because the UK has to pay more import duty. If this is true then, surely, we should want to produce as much food as possible at home. In the light	Please refer to the Applicant's response to TDO-01 on food security in <b>WB8.1.31 The Applicant's Response to Deadline 4 and Deadline 4A Submissions [REP5-038]</b> .



Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>of the ever increasing UK and global population, starvation is going to be more widespread in the future. How is it then, that the government are seeking to encourage wealthy international organisations to cover our precious land with solar panels at enormous profit to themselves and at the taxpayers expense? It does not make sense, when with more thought these panels could go on the roofs of new and existing buildings. We are losing land to housing and other developments continually. Perhaps there is no alternative for this. Solar panels on roofs are a sensible alternative to loss of food producing land. I understand that land has been downgraded to make this and other applications possible. Is that true? Furthermore the applicants wish to widen our country lanes and rip out the carbon dioxide removing trees and hedges to do so. If all these plans are approved we are faced with 13,000 acres of industrialised solar zones within a 6 mile radius around us, a total change in the nature of our rural area. We could possibly accept this if there was no choice but there is a choice. Finally, we have had solar panels on our roof since 2011. We have done this because we do take climate change very seriously. Even with a generous supplementary payment from the government, they scarcely pay their way. Changing the circuitry, replacing the inverter with all its rare metals and now, installing batteries is expensive.</p>	<p><b>The Applicant's Written Summary of Oral Submissions &amp; Responses at Issue Specific Hearing 1 and Responses to Action Points [REP1-052]</b> describes, at page 12 that <i>"the Applicant agrees that rooftop solar is desirable and should be deployed, but that this must be in addition to ground mounted large scale solar, as it is not a viable alternative"</i> for reasons described in Section 7.6 of the <b>Statement of Need [APP-320]</b>.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			Recent payments received are significant: June to August 2023 £1042.26, December 2023 to February 2024 £243.95; 23.4% in the winter when we need the most electricity compared with the summer. Solar panels are not the answer, but, at best they should go on roofs. This application and the others should be rejected and more thought given to the best approach to controlling climate change.	

**Helen Mitchell [REP5-070], [REP5-071]**

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
HM-01	Option Agreement	Agreement with landowners	Taken from a Facebook group I follow. This £1000 figure was confirmed by a farmer on an episode of Countryfile, aired on 7th April 2024. Surely, if farmers feel that renting their land for a mere £1000 per acre per annum is worth their while, then more needs to be done to make farming more affordable for farmers, to continue to use the land for which it was intended – growing crops . This is all so wrong.	The Applicant notes this comment. An assessment of the farming circumstances of the farm businesses who own and occupy the agricultural land within the Scheme can be found in Chapter 19 Soils and Agriculture <b>[APP-057]</b> from paragraph 19.8.13 onwards, with consideration given to the impacts upon these businesses during the construction, operation and decommissioning stages, along with cumulative effects.
HM-02	Climate Change	Carbon footprint	Taken from Roof Tops Not Crops Facebook group February 2024  Rethinking Solar on Farmland: A Closer Look at the Numbers	The thought experiment is useful in highlighting the many different options that are needed to be brought forward to combat climate change. Any heat island effects are anticipated to be very

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>In the global race towards sustainable energy, the deployment of solar panels on farmland has been heralded as a forward-thinking solution to reduce carbon emissions. However, when we delve deeper into the data and consider the broader environmental impacts, a paradox emerges. Could the widespread replacement of vegetation with heat-absorbing solar panels inadvertently contribute more to global warming than the CO2 emissions they are meant to offset?</p> <p>The Greenhouse Thought Experiment</p> <p>Our thought experiment, comparing two greenhouses—one filled with solar panels and the other with tomato plants—serves as a microcosm for this larger issue. The solar panel greenhouse absorbs sunlight, generating electricity but also emitting heat, whilst the plant-filled greenhouse uses sunlight for photosynthesis, cooling the environment through transpiration and sequestering CO2.</p> <p>The question is, which greenhouse would be hotter?</p>	<p>localised and are not predicted to affect any surrounding receptors.</p> <p>For carbon sequestration, Defra R&amp;D project SP08016<sup>6</sup> is clear that reverting arable land to grassland is very effective at storing carbon in the soil. Please see the Applicant's response to SOI-06 above.</p> <p>The Applicant considers that the <b>Statement of Need [APP-320]</b> together with the policy assessment in the <b>Planning Statement [EX6/WB7.5_C]</b> demonstrate a considered evaluation of the balance between the benefits and potential impacts of the Scheme.</p> <p>In relation to the use of rooftops for the installation of solar panels, please refer to the Applicant's response to comment reference 7A-32A within <b>Applicant's Response to Deadline 4 and Deadline 4A Submissions [REP5-038]</b>.</p> <p>In terms of the coverage of the site by vegetation and its role in supporting biodiversity and other related ecosystem services, the Scheme will result in the reversion of approximately 600ha of arable</p>

<sup>6</sup> Defra 2009. Best Practice for Managing Soil Organic Matter (SOM) in Agriculture - SP08016 <https://randd.defra.gov.uk/ProjectDetails?ProjectId=15536>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>To understand the full impact, we need to consider several key factors:</p> <p>Heat Island Effect: Solar panels absorb a significant amount of sunlight, converting some into electricity and releasing the rest as heat. This can exacerbate the local heat island effect, potentially raising temperatures in the surrounding area.</p> <p>Carbon Sequestration: Plants, particularly in agricultural settings, play a crucial role in absorbing CO2 from the atmosphere. Removing these plants for solar panel installation diminishes the land's capacity to sequester carbon, a critical process in mitigating global warming.</p> <p>Albedo Effect: Vegetation generally has a higher albedo compared to solar panels, meaning plants reflect more sunlight back into the atmosphere, helping to cool the Earth's surface. Replacing green spaces with dark solar panels reduces this reflective capacity, potentially contributing to temperature increases.</p> <p>Ecosystem Services: Beyond carbon sequestration, vegetation provides a range of ecosystem services, including supporting biodiversity, regulating water cycles, and preventing soil erosion. The loss of these services can have cascading effects on the environment.</p>	<p>land to diverse grassland types for the operational phase. In doing so, annual disturbance through cultivation, harvesting and crop spraying will cease, allowing the ecosystem services described in the representation to flourish.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>A Call for a Balanced Approach</p> <p>This analysis suggests that while solar energy is an invaluable part of our transition to renewable resources, its implementation—particularly on farmland—warrants a more nuanced approach. Maximising the use of existing structures, such as rooftops and non-arable lands, for solar panel installation could offer a compromise, allowing us to harness solar energy without compromising the ecological and cooling benefits provided by vegetation.</p> <p>Engaging in an Informed Discussion</p> <p>We invite you to engage with this complex issue. By examining the data and considering the broader environmental implications, we can foster a more informed and balanced discourse on the best paths forward in our sustainable energy journey. Your insights and perspectives are crucial as we navigate the challenges and opportunities of integrating solar energy into our landscapes in a way that truly benefits our planet.</p>	
HM-03	Noise	Construction Noise	<p>I am fully in support of all of the groups against farmland solar projects, including the views of 7000 Acres. Their REP4-088 7000 Acres Deadline 4 Submission - Supporting Video is shocking. In the words of my young daughter, 'what is that disgusting sound?' The thought that we would be surrounded by</p>	<p>The Applicant notes that the video that was submitted by 7000 Acres [REP4-088] relates to a difference project.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>these in our pleasant and tranquil countryside is extremely upsetting.</p> <p>This video of the construction of Cleve Hill Solar Park on You Tube is also a true insight into what we will have to endure if this and the other 3 mega solar parks proposed for this immediate area are given the go ahead.</p>	<p>The likely impacts of noise and vibration, including any anticipated impacts to residential properties, have been assessed in Section 15.7 of <b>6.2.15 Environmental Statement – Chapter 15 Noise and Vibration [APP-053]</b>. The noise and vibration effects are not anticipated to be significant.</p>
HM-04	Principle	General	<p><i>[The submission reproduces an article by Matt Ridley published in The Telegraph, entitled 'Solar farms are taking us back to the dark ages' and dated 3 April 2024]</i></p>	<p>The Applicant notes this submission, which relates to a separate scheme in Wiltshire.</p>

#### Andy Johnson [REP5-064]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
AJ-01	Landscape and Visual Impact	Aerial video	<p>Hi due to being overseas unable to use the platform for Interested Party so please accept the comments below:</p> <p>Visual impact - WB video</p> <p>The video produced to help substantiate the visual impact has been edited / produced in such a way to show virtually nothing of the impact of this project.</p> <p>1, The proposed solar developments fail to include adjacent proposals - these increase the cumulative effect</p>	<p>The voluntary aerial flyover for the Scheme <b>[REP4-098]</b> has not been produced to inform the assessment process. It has been produced to demonstrate the geographical extent of the 4 Solar NSIP Schemes contained within the Joint Report on Interrelationships between Nationally Significant Infrastructure Projects - Revision C <b>[REP4-059]</b>. This was not requested by the ExA of this Scheme but by the Cottam Solar Project ExA. It has only been produced for this Scheme for consistency with Cottam.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>2, The panels themselves have not been overlaid onto the land nor fencing &amp; CCTV points</p> <p>3, No distance calculations from housing, public access points etc</p> <p>4, No height indications of panels / fencing / CCTV points</p> <p>5, No visual representations when looking across the site horizontal</p> <p>6 Land elevation - no reference to land height changes and impact accordingly</p> <p>What has been produced does not in any way represent in part or whole the visual impact of the proposed development and therefore should be wholly rejected as a submission.</p>	<p>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 6.4.2.1 Environmental Statement - Figure 2.1 - Cumulative Assessment Site Plan <b>[APP-140]</b>, which was submitted as part of the original DCO application in March 2023.</p>

**Diane Allison [REP5-068]**

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
DA-01	Landscape and Visual Impact	Cumulative Impact	<p>The drone footage shows just how inappropriately large in scale the proposal is in relation to the villages &amp; surrounding farm land. I do not object to solar, I've had solar panels on my house for 14 years, but a development on this scale is just too big for me &amp; what</p>	<p>Please refer to the Applicant's response at GEN-01, 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
			I consider to be the detrimental impact on the environment,	

### Samuel Rawding [REP5-084]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
SRa-01	Landscape and Visual Impact	Cumulative Impact	<p>I feel it is so important to understand that this is one of many solar project happening within such a small area. That area is my home.</p> <p><a href="https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010132/EN010132-001627-Lanpro">https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010132/EN010132-001627-Lanpro</a></p> <p>Video Submission.mp4 If you can, this link shows the total impact these solar farms will have. It is clearly a scatter gun technique. But it is just so horrible that such an amount of good farming land has to be sacrificed in this way</p>	Please refer to the Applicant's response at GEN-01, in <b>WB8.1.19 Response to Written Representations at Deadline 1 Part 3 [REP3-036]</b> .

### Simon Skelton [REP5-085, REP5-087, and REP5-086 (MAP)]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
SSk-01	General	Issue Specific Hearing 5	I was unable to attend the ISH5 as this was an online event only, I have no ability to join online and as all other ISH have been blended events the decision for	The Applicant notes this comment and notes that written submissions (such as this submission by



Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			this one not to be, is not in the spirit of public engagement and fairness.	Mr Skelton) carry the same weight as oral submissions.
SSk-02	Landscape and Visual Impacts	Cumulative impacts Site Layout and Design	<p>I believe Landscape was one of the topics. My views on this are as follows.</p> <p>Solar farms of this size and scale will become ugly and industrial wastelands within the landscape.</p> <p>Like the Cottam Solar Project also by IGP, the WPSP is split over many sites spreading its impact over a wider area and in many directions. All other solar plants in this country are on single contiguous sites to limit impact from any given viewpoint. This approach is clearly nothing more than a desperate land grab with the scheme acreage being made up by using numerous parcels of land and being forced to create fragmented and sprawling schemes having untenable impact. This is not good planning as the Applicant suggests. If it was then farmland would have been chosen closer to the Grid connection and away from people's homes. This has not happened on either of the IGP schemes.</p> <p>The use of horrific 4.5m high panels is unprecedented in the UK. These are not fit to be used in areas of human habitation and shows further disregard for the landscape and residents. 4.5 metres are not low level panels as suggested should be used by Solar Energy UK and the Building Research Establishment. These monsters cannot be screened in the UK countryside</p>	<p>Mitigation has been proposed to address and minimise adverse effects on the character and visual amenity of the landscape. This is in line with the agreed methodology and the hierarchy of approach advocated by the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition and matters agreed with LCC at the series of workshops set out in Appendix 8.4 <b>Consultation [APP-075]</b>.</p> <p>For example, ES Figure 8.13.26 of the <b>Viewpoint Photography and Photomontage [APP-219]</b> shows the fencing and panels set back from the highway and also from the existing and proposed hedgerows to allow for the proposed thickening and growth of new hedgerows. The photomontage also shows how the planting mitigation has been designed to enhance the landscape character of this location with new native tree and shrub planting, improvements to existing hedgerows and new hedgerows.</p> <p>The LVIA at section 8.5 <b>[APP-046]</b> has also taken account of recognised documents and guidance such as The Historic Landscape Character</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>and the case for such panels is a laughable one, with the Applicant claiming a small amount of extra electrical yield... from solar, the lowest yielding form of electricity generation! Increasing potential profits at the expense of the landscape and communities. Inefficiency of solar is both in terms of electrical yield (between 9 and 11% of installed capacity) and its massive land consumption and associated loss of continued meaningful agriculture. The tiny amount of additional output claimed by the Developer is not worth the exponential amount of additional impact caused by using such massive apparatus. These panels would take this massacre of our landscape to another level.</p> <p>This opportunistic 2,000 acre plus proposal on so much disaggregated land, with its oversized infrastructure would be ruinous on its own but bearing in mind the cumulative 13,000 acres of solar proposals in a 6 mile radius, means that this region would become a SOLAR INDUSTRIALISED ZONE, like found nowhere else in the developed world! This is mass vandalism and for a fraction of the power that we once had feeding into the 400kv Grids at West Burton and Cottam. A retrograde step without doubt.</p>	<p>Assessment of the County of Lincolnshire (September 2011) to ensure the Scheme has been designed in a way that is sensitive to the historic landscape. The relevant section for the Scheme is TVL1 – The Northern Cliff Foothills.</p> <p>These mitigation measures are set out in The Outline Landscape and Ecological Management Plan <b>[EN010132/EX6/WB7.3_E ]</b> (the 'OLEMP') and will be secured through Requirement 7 in Schedule 2 of the Draft Development Consent Order <b>[EN010132/EX6/WB3.1_G]</b>. This includes the planting of new trees with a total area of new woodland (approximately 13.7ha) proposed across the Scheme (para. 4.4.4). The OLEMP also focuses on the gapping up of currently defunct hedgerows, creation of new hedgerows (approximately 7.1km) at boundaries where none exist (para. 4.3.11). There will also be planting around Public Rights of Way and where landscape and visual impact mitigation is required. In addition, limited opportunities for the replanting of old, removed field boundaries (where appropriate) have been pursued, historic hedgerow on West Burton 1 has been identified using 1940s Ordnance survey maps and will be re-planted (para. 4.3.2).</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>Most solar farms are only one or two hundred acres and their use of 2 metre low level panels means they could be effectively screened.</p> <p>Allowing the development of thousands of acres of 4.5m panels would be a catastrophic planning decision.</p> <p>The 3 solar NSIPs in the UK are all on single sites of considerably less land mass.</p> <ol style="list-style-type: none"> <li>1. Little crow NSIP 600 acres. Built.</li> <li>2. Cleve Hill 900 acres. Under construction. (The YouTube video shows disturbing levels of construction impact.)</li> <li>3. Longfield 1000 acres. Planned for construction.</li> </ol> <p>A 6-mile radius would be getting 13,000 acres of solar!</p> <ol style="list-style-type: none"> <li>1. WBSP.</li> <li>2. Cottam Solar Project.</li> <li>3. Gate Burton Energy Park.</li> <li>4. Tillbridge Solar.</li> <li>5. Steeple Renewables.</li> </ol> <p>With many more very close by, such as One Earth Solar, Fosse Green, and Great North Road Solar etc... PLEASE SEE "SOLAR INDUSTRIALISED ZONE" MAP PDF.</p>	<p>At Deadline 4 the Applicant updated the Biodiversity Net Gain Requirement, which is secured in Schedule 2 Requirement 9 in the <b>WB3.1_G Draft Development Consent Order Revision G [EN010132/EX6/WB3.1_G]</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 minim of 26.6% biodiversity net gain in river units. This must be submitted to and approved by the relevant planning authority.</p> <p>The LVIA's <b>[APP-046]</b> intention is also to address management prescriptions in order to future proof the custody of the landscape and to reflect the drivers for change that are identified in the various published character assessments. This review is secured in the OLEMP <b>[EN010132/EX6/WB7.3_E]</b> to ensure the management of the landscape reflects the pressure for change.</p> <p>Finally, in order to secure high quality design for the Scheme, the Landscape and Ecological Mitigation Plans will be developed in full detail covering both the soft and hard landscape works. Through the OLEMP <b>[EN010132/EX6/WB7.3_E]</b> , secured by Requirement 7 of Schedule 2 of the Draft Development Consent Order,</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>There are new proposals appearing every few months. It is just all solar. Cheap to install maybe but none of this "cheapness" is passed on to the customer.</p> <p>Map submitted with reference <b>[REP5-086]</b>.</p>	<p><b>[EN010132/EX6/WB3.1_G]</b> requires that these plans be submitted to and approved in writing by the local planning authority. The soft landscape works shall include types of planting (species), as well as number, density and specification of planting. The design objectives of the soft and hard landscape areas would be set out within a design code or guide as approved in writing by the local planning authority.</p> <p>Please refer to the LVIA <b>[APP-046]</b> specifically Table 8.21 which sets out the strategic approach to the landscape design parameters that have been adopted in the process of developing the environmental masterplan and associated landscape mitigation measures. These measures are particularly suited to a series of separate sites for the following reasons.</p> <p><b>Visual Buffers in Low-Lying Areas:</b> The low-lying areas between the separate Sites are effective as visual buffers on a horizontal plane. This likely helps in reducing the visual impacts of the panels.</p> <p><b>Existing Vegetation Network:</b> The intermediary areas between the separate Sites boast a strong network of existing vegetation providing structural benefits to the landscape. The existing vegetation</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				<p>also acts as a backdrop for the panels and helps them integrate, particularly in views towards the horizon.</p> <p><b>Watercourse Integration:</b> The watercourses are noted as distinct features in the landscape, and careful use of scattered tree and shrub planting helps reinforce their presence in a generous open context while setting panels back.</p> <p><b>New Planting and Green Infrastructure:</b> A key policy objective is the incorporation of new planting and green infrastructure in all landscape mitigation measures. The receiving landscape is designed to allow space for such green infrastructure between areas.</p> <p><b>Open Character and Celebration of the Landscape:</b> The areas between the separate Sites provide open character. Whilst this may not be a requirement in all locations, the character of these areas can be celebrated, emphasizing the importance of preserving these unique landscape qualities.</p> <p><b>Buffering of Public Rights of Way:</b> Public rights of way are buffered, maintaining accessibility while</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				<p>minimising the impact of the panels along these routes.</p> <p><b>Scope for extended appreciation of the landscape:</b> The areas between the Sites also provide scope for extended enjoyment of the landscape in these areas either through interpretation, access or exponentially.</p> <p><b>Retaining and Enhancing Time Depth:</b> The time depth within the landscape involves considering historical and cultural aspects such as the setting of settlements and the views of churches. The receiving landscape between the Sites provides scope to preserve and enhance the time depth of the landscape.</p> <p>Although the Scheme comprises a series of independent parcels of land or Sites, they are set within an extensive agricultural landscape. With large tracts of land between each parcel, each is set apart by their associated features such as robust hedgerows, woodland and tree cover, intervening settlements and the road and rail infrastructure. The Scheme is also offset from all key receptors such as settlement edges, individual residential properties, PRoW and transport routes which further assist with its assimilation and dispersion across the landscape. The discrete</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				<p>parcels of land in the Scheme are placed so far apart that the Scheme would not be perceived in its entirety and the solar panels are distributed 'in and amongst' the landscape features allowing them to help assimilate into the landscape to a comfortable degree.</p> <p>The provision of a solar scheme with discrete parcels of land is therefore a more favourable approach than having a single large site, as it allows for a distributed and less obtrusive deployment of the solar panels. The presence of the intervening landscape also provides scope for areas of mitigation and the ability to build upon the connectivity of green infrastructure and ecology and nature conservation and retain the existing landscape pattern.</p> <p>Regarding the comments stating the site should be a single site, the 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></p>
SSk-03	Need for the Scheme	Efficiency of solar	The Operator will get their handsome CfD payment/subsidy whether demand requires power or not and the consumer will get to foot this bill together with the associated costs for energy backup for dull and dark conditions. Deployed in this way, solar is	Please see the response to SIPC-24 of the <b>Applicant's Responses to Relevant Representations [REP1-050]</b> for an explanation of the need for the Scheme and the Site suitability.

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>expensive. It is only cheap for the Developer/Operator. They would get rich at our expense.</p> <p>Solar is reliably, unreliable.</p> <p>It is merely a whim that we are displacing agriculture with ineffective solar schemes in this country. What is so sickening, is that they will stand idle in the fields for half their life and for the other half they would generate not even close to their nameplate capacity. What a waste of land and vital Grid connections.</p> <p>What this scheme will achieve along with its many sisters is the destruction of our landscape, communities, and the social fabric of this agricultural region.</p> <p>Solar is not a Primary Generator for the UK and must not be allowed to consume more land than all the other utility projects combined. (There are 130GW of solar on the National Grid TEC register, this could cover over 600,000 acres of farmland!)</p> <p>These giant solar schemes would start and end their lives as the largest building sites on Earth. The videos of the Cleve Hill construction are terrifying. Solar on farmland of this magnitude is clearly flawed. Other countries would laugh at this current trend going on in this small, dull, and densely populated island.</p>	<p>Climate Change poses a significant threat to mankind and its effects will be felt across borders. The need for renewable energy to reduce these effects is highlighted in government policy, which states solar is a key part of this.</p> <p>Government's analysis concludes that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar" [NPS EN-1 (November 2023), Para 3.3.20]. It therefore follows that the Scheme will, if consented, mark a critical step in delivering on a pathway to a sustainable future.</p> <p>Sections 7.5 and 7.7 of Statement of Need <b>[APP-320]</b> provide evidence to support the suitability of the proposed location and the proposed scale of the Scheme.</p>



Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>Vast land loss and industrialisation for such little electricity generation is not in the country's best interests and these schemes do not have public support.</p> <p>An off ramp for solar promoted in this way is now available.</p>	
SSk-04	Landscape and Visual Impact	Cumulative impact	<p><b>Response to REP4-098 Supporting Video flyover footage.</b></p> <p>Having just viewed this damning visual aid, I would like to comment on this sickening footage and the level of proposed solar development in one area. Firstly, it fails to show the "Steeple Renewables" proposal, which is now the fifth NSIP for the area and is just across the river from the Gate Burton Energy Park. (See map PDF) This fifth proposal should be added to the flyover for the ultimate benefit of the Secretary of State. These 5 NSIPs all fall within a 10km/6-mile radius and cover a staggering 13,000 acres of farmland, with not one rooftop or brownfield site being used. The footage also fails to show the aggressive proportions of the 4.5m high solar panels proposed for the WB and Cottam solar projects. This giant infrastructure is not used anywhere else in the UK, and for good reason. (Heckington Fen abandoned their proposed use during consultation.) The footage does however highlight cumulative effect, poor site selection and bad design. It</p>	<p>The voluntary aerial flyover for the Scheme <b>[REP4-098]</b> has not been produced to inform the assessment process. It has been produced to demonstrate the geographical extent of the 4 Solar NSIP Schemes contained within the Joint Report on Interrelationships between Nationally Significant Infrastructure Projects - Revision C <b>[REP4-059]</b>. This was not requested by the ExA of this Scheme but by the Cottam Solar Project ExA. It has only been produced for this Scheme for consistency with Cottam. 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 6.4.2.1 Environmental Statement - Figure 2.1 - Cumulative Assessment Site Plan <b>[APP-140]</b>, which was submitted as part of the original DCO application in March 2023.</p> <p>In relation to the use of rooftops for the installation of solar panels, please refer to the Applicant's response to comment reference 7A-32A</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			also shows an uncontrolled avalanche of solar applications in the neighbourhood. It is evident that the Developer has underestimated the landscape with the sites chosen and their setting within this area of Great Landscape Value. There is a large body of evidence testifying to the value placed on this highly visible and unique landscape by local people. This accumulation of 5 solar proposals also shows the Developer's lack of ambition for brownfield sites and rooftops, as not one has been incorporated into this scheme. it is clear to me that the Government's push for a "Rooftop Revolution" is slipping away, and our small country is losing control of its energy and food industries, not helped by Solar Greenwashing, which will inevitably contribute to net zero failures, rising energy costs and economic decline.	within <b>Applicant's Response to Deadline 4 and Deadline 4A Submissions [REP5-038]</b> .

**P Mitchell [REP5-077]**

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
PMi-01	General	Opposition to Scheme	I concur and support fully with the Interested Parties who have either spoken so compellingly against the West Burton Solar Project at Open Floor Hearings and / or submitted relevant representations to the Examining Authority opposing this scheme and the cumulative effects of Cottam Solar, Gate Burton Solar	The Applicant notes this comment.


Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			and Tillbridge Solar projects and believe their statements are factual and honest.	
PMi-02	Principle of Development  Landscape and Visual Impact	Aerial Flyover	<p>AERIAL FOOTAGE OF WEST BURTON SOLAR, COTTAM SOLAR, GATE BURTON SOLAR AND TILLBRIDGE SOLAR SITES</p> <p>These four (now six projects) are all within a 10 kilometre radius (6 miles). The scale of the impact on the quality food producing fertile farmland and countryside seen from the aerial footage of these four monstrous schemes is overwhelming and beyond harrowing. Stow Park Luminous Energy adjacent to West Burton 3 and Steeples Renewables are expressly within the scope of the aerial footage but even as the cumulative effects of these two projects increase the land grab to 13,000 acres, they have been excluded from the image. The aerial footage, predictably, has also failed to illustrate any of the predominantly 4.5m high tracking and non-tracking panels in situ, 7,000,000 from the four schemes, the BESS batteries, the associated infrastructure and the names of all the 30+ villages that will be affected and as such is not an authentic account. The aerial footage is misleading the public yet again and as also shown in the images below.</p>	<p>The voluntary aerial flyover for the Scheme <b>[REP4-098]</b> has not been produced to inform the assessment process. It has been produced to demonstrate the geographical extent of the 4 Solar NSIP Schemes contained within the Joint Report on Interrelationships between Nationally Significant Infrastructure Projects - Revision C <b>[REP4-059]</b>.</p> <p>This was not requested by the ExA of this Scheme but by the Cottam Solar Project ExA. It has only been produced for this Scheme for consistency with Cottam.</p> <p>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 6.4.2.1 Environmental Statement - Figure 2.1 - Cumulative Assessment Site Plan <b>[APP-140]</b>, which was submitted as part of the original DCO application in March 2023.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
PMi-03	Consultation	Misleading consultation material	<p>THE MISLED GENERAL PUBLIC – THE MISLED 30+ COMMUNITIES</p> <p>The images A B &amp; C below may be from 2021 onwards but they illustrate importantly how we were being misled and are still being misled in 2024 !</p> <p>Images A and B below misled the public as to the scale of West Burton and Cottam Solar projects and bore no resemblance to the thousands of acres of highly productive farmland and countryside that cumulatively these two projects, notwithstanding Gate Burton Solar and Tillbridge Solar, would seek to destroy. Island Green Power's terminology of hectares (not acres) in their descriptions added further to the public's confusion and it is clear to see why then, and throughout the Examination Process, the 30+ affected communities place no trust in the company nor its representatives. See Image 'C' on page 2 of this submission.</p> <p>Image A is taken from Island Green Power's West Burton and Cottam Solar Project Phases One and Two Consultation Leaflets produced in November 2021 and April 2022. Both leaflets on page 3 illustrate the 5MW Trethosa Solar project in Cornwall, an Island Green Power project – no reference to the acreage in the leaflets but an internet search I undertook at the</p>	<p>The Applicant acknowledges this comment and is confident that the level of consultation undertaken and information presented throughout the pre-application stage is in accordance with the Planning Act 2008 and associated guidance. This has been evidenced in <b>5.1 Consultation Report [APP-022]</b>, which was submitted to the Planning Inspectorate and accepted for examination.</p> <p>The Applicant has published photographs of operational solar farms within their portfolio and within the UK. These images served to help the community understand what a solar farm would look like when in operation. The Applicant notes that aerial maps depicting the site area were also included in pre-application consultation materials, detailing the scale of the Scheme.</p> <p>As part of the Landscape and Visual Impact Assessment (LVIA), the phase two consultation featured visualisations which illustrate how the specific scheme would appear if consented. The Applicant notes that the site location plan for the Scheme (<b>APP-006</b>) is available on the Examination Library documents page on the Planning Inspectorate's website.</p>


Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>time described the site as 25 acres . Why exclude the acreage next to the image at the time ?</p> <p>Image B is from Island Green Power's West Burton and Cottam Solar Project Phase Two Consultation Leaflet dated June 2022, illustrating the same 5MW Trethosa Solar project but showing a different panel image in close up ! There is wasted space at the top of the page, the image is pushed to the bottom of the page and reproduced at such an angle the panels appear almost flat !! These Consultation Leaflets were A5 in size (21cm x 15cm / 6" x 8") very small thus further reducing the visual impression and impact of not only Trethosa Solar but as stated above the impact of the West Burton Solar and Cottam Solar Projects.</p> <p>Although the above information contained on pages 1 and 2 may not be considered relevant at this stage of the Examination by the Examining Authority's Inspectorate I believe it demonstrates from the outset the difficulties the residents of the affected communities have experienced in participating in the process and therefore it should form part of this submission along with the further information contained herein.</p> <p>Persistent and excessive over use of the words 'may', 'anticipated' and 'could' throughout all aspects of the</p>	<p>The impacts of the Scheme, including on local communities, have been fully assessed through the <b>Environmental Statement [APP-039 to APP-060, REP1-012, REP1-073 and REP3-010]</b> that accompanies the application.</p> <p>In relation to food security, please refer to the Applicant's responses at LCC-21 in <b>WB8.1.17 Response to Written Representations at Deadline 1 Part 1 [REP3-034]</b> and SOI-01 in <b>8.1.2 The Applicants Responses to Relevant Representations [REP1-050]</b>.</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>Regarding the further points raised, please see the response to SIPC-24 of the <b>Applicant's Responses to Relevant Representations [REP1-050]</b> for an explanation of the need for the Scheme and the Site suitability.</p> <p>Climate Change poses a significant threat to mankind and its effects will be felt across borders. The need for renewable energy to reduce these effects is highlighted in government policy, which states solar is a key part of this.</p>


Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>Applicant's literature and documentation submitted to the Planning Inspectorate, even at this stage in the examination process, continues to denote that the Applicant, Island Green Power's mitigation statements, cannot be wholly relied upon. The Applicant has been particularly reticent and economic with its responses to so many aspects of this proposed solar scheme and Cottam Solar when questions have either not been answered or answers have been vague / inaccurate and / or misleading from the outset.</p>	<p>Government's analysis concludes that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar" [NPS EN-1 (November 2023), Para 3.3.20]. It therefore follows that the Scheme will, if consented, mark a critical step in delivering on a pathway to a sustainable future.</p> <p>Sections 7.5 and 7.7 of Statement of Need [APP-320] provide evidence to support the suitability of the proposed location and the proposed scale of the Scheme.</p>


Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<div data-bbox="1182 304 1335 373" style="border: 1px solid black; padding: 2px; display: inline-block;">IMAGE</div> <p data-bbox="801 379 931 405"><b>About us</b></p> <p data-bbox="801 427 1317 520"><b>Cottam and West Burton Solar Projects are being developed by Island Green Power, who are a leading international developer of renewable energy projects, established in 2013.</b></p> <p data-bbox="801 545 1323 635">Island Green Power has delivered 26 solar projects worldwide totalling more than 1GW of capacity. This includes 14 solar projects in the UK and Republic of Ireland. Their mission is to increase solar energy usage, making more renewable energy possible and saving thousands of tonnes of CO<sub>2</sub> in the process.</p> <p data-bbox="801 651 1317 708">Island Green Power is committed to responsible land use and believe that the development and delivery of large-scale solar farms can be achieved in harmony with their surroundings.</p>  <p data-bbox="801 1117 1151 1133">Island Green Power solar project in Trethosa, Cornwall</p>	

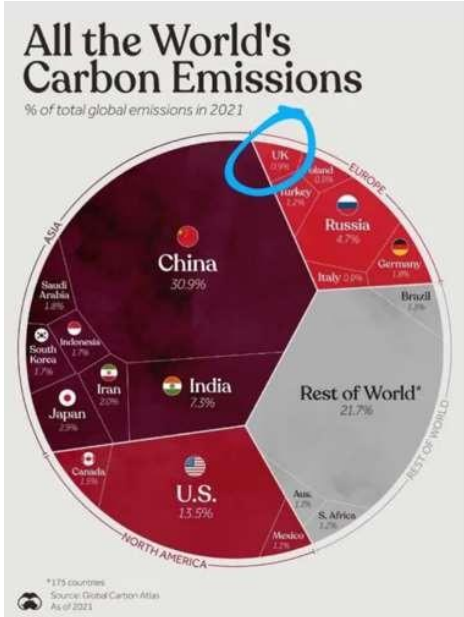
Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<div data-bbox="1173 308 1314 371" style="border: 1px solid black; padding: 2px; text-align: center;">IMAGE</div> <p data-bbox="781 456 1290 619">Both the Cottam Solar Project and West Burton Solar Project are classified as Nationally Significant Infrastructure Projects, because of the amount of renewable energy they will generate. This means we have to submit two separate Development Consent Order (DCOs) planning applications, one for each project. Although we will be submitting two DCOs applications, we recognise how close the projects are together and are developing the proposals in parallel. This consultation is for both projects to provide a joint opportunity to give feedback on either one or both projects, so you don't have to submit feedback twice.</p> <p data-bbox="781 635 1290 707">Copies of this leaflet, our feedback form, and the PEIR for each project are all available on our project websites: <a href="http://www.westburtonsolar.co.uk">www.westburtonsolar.co.uk</a> and <a href="http://www.cottamsolar.co.uk">www.cottamsolar.co.uk</a> and at the Community Access Points listed at the back of this leaflet.</p> <p data-bbox="781 722 1290 794">Please don't hesitate to get in contact with us if you have any questions about our phase two consultation, including to request copies of the consultation materials. You can reach us by using the contact details on the back page of this leaflet, including by email, phone or post.</p>  <p data-bbox="792 1114 1151 1129">An example of an island Green Power solar project in Cornwall</p> <p data-bbox="752 1198 1420 1343">Image C below is the same 5MW (five megawatts) Trethosa Solar project on the same 25 acres but shown on another website and the glint and glare can quite clearly be seen in this image yet the reproduced</p>	



Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>images in the Island Green Power Consultation Leaflets above of this submission have been cut down even further in size to disguise the glint and glare from the solar panels. Multiply the panels in this image below 10 times for a 250 acre solar site. Multiply the panels in this image 100 times for a 2,500 acres solar site. Multiply the panels in this image 500 times for 12,500 acres of solar site and then include the associated hardware BESS batteries, cctv, sub-stations and even more paraphernalia.</p> <div data-bbox="779 722 1406 1173" data-label="Image">  <p data-bbox="792 722 1366 758">Energysmart secured lease option with landowner and grid offer from Western Power along with planning permission. Shovel ready project was then sold to Island Green Energy who built the farm.</p> </div> <p data-bbox="748 1238 1424 1345">Image D illustrates the landscape of a large scale solar 'farm' in China. Although the entire scheme wasn't visible from the image available to display here it can</p>	

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>be seen this is still on a colossal scale. However, it states in the narrative that it is equally inefficient as while a Chinese solar farm may be billed as having a capacity of, for eg 200 megawatts, less than a sixth of that on average actually gets used. The reasons for a low capacity factor can include things over which they have no control, such as the weather but it also states there are other problems for this where power is lost along the huge transmission lines, many kilometres long, that connect distant solar farms to places that need electricity.</p>  <p>Image E below illustrates Kamuthi 648 MW Solar Plant, Tamil Nadu, India. The complete solar scheme wasn't visible from the image available to display here but again it can be seen this is on another monstrous</p>	

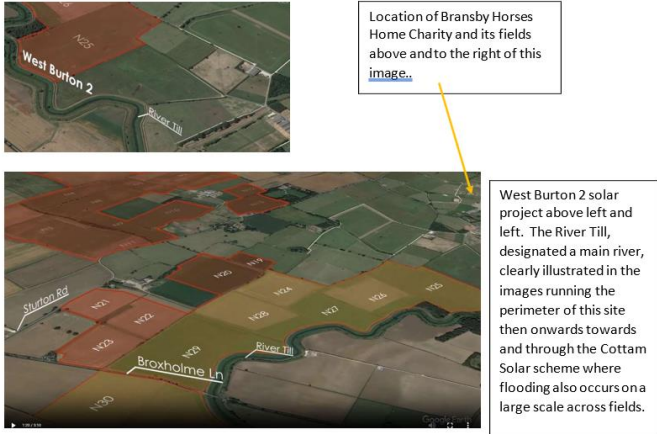
Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>scale and similar in MWs to West Burton Solar and Cottam Solar, albeit they are on parcels of land 1, 2 and 3 the effect from six cumulative solar plants, on 13,000 acres of farmland around the 30+ affected communities where tourism and agriculture lie at the heart of Lincoln and Lincolnshire's economy, will be nothing short of catastrophic.</p>  <p>These above two solar plants are in countries with enormous land mass compared to the UK:-</p> <p>India has 2,042,403 sq miles (3,286,927 sq kms), China 5,793,638 sq miles (9,323,957 sq kms),</p> <p>And the whole of the UK is 150,679 sq miles (242,495 sq kms). We are a tiny island in comparison to the other areas of the world where large scale solar of the</p>	

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response																																								
			<p>type shown on page 3 and what is proposed in England is located.</p> <ul style="list-style-type: none"> <li>• Compare the carbon emissions of the UK to the rest of the world in 2021 and see from the circled area on the chart below we produce a tiny fraction - 0.9% !</li> </ul>  <p><b>All the World's Carbon Emissions</b> % of total global emissions in 2021</p> <table border="1"> <thead> <tr> <th>Country/Region</th> <th>Percentage</th> </tr> </thead> <tbody> <tr><td>China</td><td>30.9%</td></tr> <tr><td>U.S.</td><td>13.5%</td></tr> <tr><td>India</td><td>7.5%</td></tr> <tr><td>Rest of World*</td><td>21.7%</td></tr> <tr><td>UK</td><td>0.9%</td></tr> <tr><td>Russia</td><td>4.7%</td></tr> <tr><td>Germany</td><td>1.8%</td></tr> <tr><td>Japan</td><td>2.8%</td></tr> <tr><td>Iran</td><td>2.0%</td></tr> <tr><td>South Korea</td><td>1.7%</td></tr> <tr><td>Indonesia</td><td>1.7%</td></tr> <tr><td>Saudi Arabia</td><td>1.6%</td></tr> <tr><td>Canada</td><td>1.5%</td></tr> <tr><td>Mexico</td><td>1.2%</td></tr> <tr><td>Am. S. Africa</td><td>1.2%</td></tr> <tr><td>Brazil</td><td>1.2%</td></tr> <tr><td>Italy</td><td>0.2%</td></tr> <tr><td>Turkey</td><td>0.2%</td></tr> <tr><td>Israel</td><td>0.2%</td></tr> </tbody> </table> <ul style="list-style-type: none"> <li>• West Burton Solar 1, 2 and 3 does not offer a sustainable future. It is oversized, incompatible with its surroundings and of little local community benefit. Lincoln / Lincolnshire and its communities are set to be devastated by the industrialisation of the</li> </ul>	Country/Region	Percentage	China	30.9%	U.S.	13.5%	India	7.5%	Rest of World*	21.7%	UK	0.9%	Russia	4.7%	Germany	1.8%	Japan	2.8%	Iran	2.0%	South Korea	1.7%	Indonesia	1.7%	Saudi Arabia	1.6%	Canada	1.5%	Mexico	1.2%	Am. S. Africa	1.2%	Brazil	1.2%	Italy	0.2%	Turkey	0.2%	Israel	0.2%	
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Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>landscape from this / these projects for financial gain when there are clearly better energy alternatives is difficult to comprehend and invokes scepticism / suspicion on this / these project's statement of purpose. Alternatives are available given the reported performance of UK offshore wind (and the potential of onshore wind) in line with current strategic planning policy, combined with the current growth rate in rooftop solar means that the UK is projected to be self-sufficient and actually able to export energy by the year 2030. Therefore there is no sound or science based planning reason for this project to be approved and this alone challenges the need to cover farmland and greenfield sites with huge solar installations. The risks of Island Green Power's proposals very much outweigh the hypothesised/speculated benefits put forward by them - we do not wish to lose the beauty and tranquillity of the Countryside.</p> <ul style="list-style-type: none"> <li>• Over a 40 - 60 year period there would be intolerable, constant disruption to the 30+ villages affecting the residents, the wildlife, the bio-diversity and the roads when the solar panels required replacing (every 20 years ?) and BESS batteries (every 10 years ?) from any one or all of these six schemes.</li> <li>• There are innumerable places for solar schemes such as motorway central reservations, supermarket</li> </ul>	


Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>car parks, brownfield land (Ministry of Defence bases) and then there are floating solar schemes and hydro-power schemes – we are an island surrounded by water. We do not have finite land yet we have a growing population.</p> <ul style="list-style-type: none"> <li>• I am supportive of the West Burton fusion project – it will bring infrastructure to the area and provide jobs for the future generations for years and only take up a miniscule amount of land in comparison to these calamitous solar projects ....these industrial scale solar schemes will not provide long term jobs for local people. In fact, it/they will be taking away farmland when many of our local residents are farmers.</li> <li>• Food security is important. We are at risk of endangering swathes of valuable agricultural land at a time when severe economic hardship and a war in Europe highlight the value of home grown food. The loss of agricultural land is insupportable and the loss of food production. It is expected that the Inspectorate will not support the loss of farms and green space at such a critical time for the food supply chain. Such a decision would defy logic.</li> <li>• Foreign investment seems to be a significant force in the market with little evidence of long term commitment to the UK. The community benefit offered to supporting communities touted by some of</li> </ul>	

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>these investors does not stand up to scrutiny and is frequently not transparent. There is, therefore, considerable and understandable public opposition to such a massive proposal. Most of those consulted have taken the view that this is not a potentially valuable nor viable contribution to the country's future energy needs but in fact a 'get rich quick' project for foreign investors. The Inspectorate must be aware of this as there are 13 NSIP solar schemes coming forward or are already under examination in Lincolnshire amounting to 26,000 acres of agricultural land.</p> <ul style="list-style-type: none"> <li>• Any purported community benefits 'dangled like a carrot' by Island Green Power, Low Carbon and Tillbridge Solar will be of little use to the residents as these won't even cover the decrease in property values in the area.</li> <li>• Flooding across England's farmland during the Autumn and Winter of 2023 and January 2024 where crops have been ruined with the resultant shortage of food that will occur in 2024 is further warning of the importance of protecting grades 3, 3a and 3b fertile agricultural land from industrial scale solar schemes of this nature.</li> </ul>	

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
PMi-04	Hydrology, Flood Risk and Drainage	Flooding of neighbouring properties	<p><b>BRANSBY HORSES HOME – FLOODING</b></p>  <p>This Charity's land is also on the flood plain around West Burton 2 solar where the River Till runs along the perimeter of the West Burton 2 site and the charity was severely affected when a number of fields belonging to it were under flood water in November 2019. They had to move 100 of the 450 animals to an alternative site, a number of planned fundraising events were cancelled and they suffered losses of about £200,000.</p> <p>The flood water rendered these field unable to support grazing for the horses.</p>	<p>The proposed solar schemes will not contribute to an exacerbation of flooding in the area. This is also the case for the other stated schemes.</p> <p>The embedded mitigation detailed in section 10.7 of <b>6.2.10 ES Chapter 10 Hydrology, Flood Risk and Drainage [APP-048]</b> will ensure there is no loss of flood storage as a result of the development and that the existing surface water run-off regime will be mimicked.</p> <p>There is no UK environmental managing guidance with regards to runoff from solar panel installations. However, research undertaken in the United States (US) by Cook and McCuen (2013) considered this comment and concludes:</p> <p>'The addition of solar panels over a grassy field does not have much of an effect on the volume of runoff, the peak discharge, nor the time to peak. With each analysis, the runoff volume increased slightly but not enough to require storm-water management facilities'. The research recommends that vegetation cover beneath the panels is well maintained or that a buffer strip is placed after the most downgradient row of panels.</p> <p>Bullet point 3 of paragraph 10.8.1 within <b>6.2.10 ES Chapter 10 Hydrology, Flood Risk and</b></p>



Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>Below are a few images of the flooding at Bransby Horses Home in 2019.</p>  <p>As can be seen from the following extract of the Bransby Horses Home Spring/Summer 2024 issue newsletter to supporters the serious matter of flooding again of their grazing land during the latter part of 2023 and early 2024 is a grave concern. On page 5 of this submission the Bransby Horses Home grazing land is in the same area of the West Burton 2 Solar project and in the fields on the East side of the B1241 Sturton by Stow to Saxilby 4.5m high tracking solar panels are proposed which during prolonged</p>	<p><b>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> <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>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>periods of persistent heavy rain would worsen flooding issues.</p>  <p>There is the emotional distress when a home is flooded, the wildlife lost, the River Till, fields, hedges and roads no longer visible as they become part of the flood plain as the River Till and dykes fail to cope with the volume of water.</p>	<p>The drainage strategy and detailed drainage design will be developed during the detailed design process. As secured by Requirement 11 in Schedule 2 of the <b>WB3.1_G Draft Development Consent Order Revision G [EN010132/EX6/WB3.1_G]</b> "No part of the authorised development may commence until written details of the surface water drainage scheme and (if any) foul water drainage system for that part have been submitted to and approved by the relevant planning authority."</p>
PMi-05	Other Environmental Matters (Human Health)	Mental health Impact upon wildlife	<p>The West Burton Scheme proposal will detrimentally affect Mental Health and Wellbeing, will detrimentally affect Biodiversity and Biodiversity Net Gain, it will detrimentally affect Landscape and Visual Effects, it proposes to infringe the use of Public</p>	<p>The assessments carried out by the Application in relation to human health and wellbeing are set out in <b>ES Addendum 21.1: Human Health and Wellbeing Effects [REP4-077]</b>.</p> <p>The Applicant refers to their previous responses in relation to cumulative impact on landscape</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
	Ecology and Biodiversity  Landscape and Visual Impact	Cumulative landscape impacts	<p>Footpaths/Public Rights of Ways (PRoW's) and so much more.</p> <p>People are moved by nature, they are moved by flora and fauna, the clouds changing and the weather. It changes their whole feeling and they can feel immense happiness and also immense melancholy but it fills them with hope and gives them a spring in their step. People go for answers when walking in the wide open countryside – we do not want to have to drive to find the wonder of the countryside elsewhere when we have this beautiful and uplifting land already surrounding our 30 villages because the area becomes industrialised through mammoth solar developments.</p> <p>There is so much wildlife in this area – local residents have photographed / witnessed - Barn Owls, Tawny Owls, Long tailed Tits, Kestrels, Great Tits, Red Kites, Chiffchaff, Linnet, Brown Hares, Long-eared bats, Pipistrelles, Hedgehogs, Roe Deer, Muntjac Deer, Butterflies, Dragonflies, Moths, Common Toads, Frogs, Lizards, Grass snakes, resident Swans, Canadian Geese, Badgers, Fox the list is never ending. The fields and hedgerows are their homes on the proposed West Burton and Cottam solar project sites. WHY destroy the habitat and wildlife already there ?</p>	<p>character in the response to ExQ 1.8.19 in <b>The Applicant's Responses to ExA First Written Questions at Deadline 3 [REP3-038]</b>.</p> <p>The impacts of the Scheme on the ecology of the Site and the surrounding area were assessed within <b>ES Chapter 9 Ecology and Biodiversity [APP-047]</b>. The conclusions are set out within <b>ES Chapter 23 Summary of Significant Effects [REP3-010]</b>.</p> <p>With reference to the wildlife listed in the representation, the habitats most frequently used and relied upon by these species will be retained and enhanced through the proposals, conferring a net benefit upon them. Hedgerows will be retained in full save for a small number of new or widened field openings for access, while several kilometres of new hedgerow and tree planting will take place. Grassy field margins will be widened and diversified specifically for the benefit of wildlife, while approximately 600ha of grassland will result from the cessation of agricultural cultivation, harvesting and spraying during the operation of the Scheme. Furthermore, extensive wetland creation specifically for wetland birds such as lapwing is proposed.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>We must protect and regenerate this existing habitat for the wildlife to prosper into the future not remove and replant which would lead to a bio-diversity net loss not net gain. Hedgerows are the 'reservoirs of life'.</p> <p>The communities of 30 villages will be affected, (including mine which will be completely surrounded and overwhelmed North, South, East and West for miles) whichever road I travel daily and also along the narrow, inter-twining country lanes between these villages. It is unimaginable having to consider living with this level of industrialisation of 10,000 acres of countryside for 365 days of the year for up to 60 years. No escape, encircled, imprisoned by four solar projects of this enormity a few miles from each other with all the horrendous hardware, whichever direction we look - Cottam, West Burton, Gate Burton and Tillbridge solar.</p>	<p>Cumulative landscape and visual effects relating to the Cumulative Developments have been considered at section 8.10 of the LVIA <b>[APP-046]</b> with findings set out within the individual receptor sheets within Appendix 8.2 <b>Assessment of Potential Landscape Effects [APP-073]</b> and Appendix 8.3 <b>Assessment of Potential Visual Effects [APP-074]</b>. Proposed cumulative sites are shown on LVIA Figure 8.14 <b>Cumulative Sites Augmented ZTV [APP-266]</b> and proposed cumulative developments are shown on LVIA Figure 8.15 <b>Cumulative Developments [APP-271]</b>.</p> <p>The effect of cumulative schemes has been considered within the specific context of the inter-relationship of the multiple proposed NSIP solar projects. Appendix E of the updated <b>Joint Report on Interrelationships between Nationally Significant Infrastructure Projects Revision D [EX6/WB8.1.9_D]</b> summarises the respective findings of these independent assessments.</p>

**Cheryl Felix [REP5-066]**

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
CF-01	Cumulative impact	Aerial footage	We have seen the aerial footage of the extent of these solar 'farms' and are appalled. £13,000 acres! And that's without the planned electricity pylons and the offshore wind turbines. Lincolnshire is becoming a dumping ground for energy infrastructure, and our countryside is being sacrificed on the altar of the nebulous great god Net Zero.	Please refer to the Applicant's response to GEN-01 in <b>WB8.1.19 Response to Written Representations at Deadline 1 Part 3 [REP3-036]</b> .

**Tracy Adderley [REP5-097]**

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
TA-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	The Applicant refers to its response to JPLPTA-01 in <b>WB8.1.31 The Applicant's Response to Deadline 4 and Deadline 4A Submissions [REP5-038]</b> .

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			cumulative effect of 10,000 acres of farmland lost and the industrialisation of the area as a whole. However this is not the whole picture since there are potentially 9 or more projects covering some 27,000 to 30,000 acres. It is clear that more and more farmers and landowners are being approached to lease their land for solar development.	
TA-02	Soils and Agriculture	Food security	<p>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".</p> <p>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.</p>	The Applicant refers to its response to JPLPTA-02 and JPLPTA-03 in <b>WB8.1.31 The Applicant's Response to Deadline 4 and Deadline 4A Submissions [REP5-038]</b> .

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
TA-03	<p>Planning Policy</p> <p>Alternatives and Design Evolution</p>	<p>National energy policy</p> <p>Alternative renewable energy sources</p>	<p>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 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</p>	<p>The Applicant refers to its response to JPLPTA-04 in <b>WB8.1.31 The Applicant's Response to Deadline 4 and Deadline 4A Submissions [REP5-038]</b>.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			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.	
TA-04	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 its responses to comments on matters of agricultural employment, skills, general employment and economic performance, and tourism in Section 2.14 of <b>WB8.1.19 Response to Written Representations at Deadline 1 Part 3 [REP3-036]</b>.</p> <p>The Applicant refers to its response to JPLPTA-05 in <b>WB8.1.31 The Applicant's Response to Deadline 4 and Deadline 4A Submissions [REP5-038]</b>.</p>
TA-05	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. Also it is my understanding (from	The Applicant refers to its response to JPLPTA-06, JPLPTA-07 and JPLPTA-08 in <b>WB8.1.31 The Applicant's Response to Deadline 4 and Deadline 4A Submissions [REP5-038]</b> .



Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>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? 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.</p>	
TA-06	Soils and Agriculture	Restoration of land to arable	<p>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? Whilst the pictures of sheep grazing the land suggest an idyllic pastoral scene they are probably the only animals that could graze without damaging the solar panels. Unfortunately, this image presumes that there are farmers that would want to farm sheep and it is well known that sheep are the hardest to manage successfully and have a high death rate. It also assumes that sheep farmers can make a profit and</p>	<p>The Applicant refers to its response to JPLPTA-09 in <b>WB8.1.31 The Applicant's Response to Deadline 4 and Deadline 4A Submissions [REP5-038]</b>.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			with feed costs high (imported as land is under solar panels) this is highly unlikely	
TA-07	Transport and Access	Suitability of access roads	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.	The Applicant refers to its response to JPLPTA-10 in <b>WB8.1.31 The Applicant's Response to Deadline 4 and Deadline 4A Submissions [REP5-038]</b> .
TA-08	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.</p> <p>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.</p> <p>I strongly urge that this proposal be rejected.</p>	The Applicant refers to its response to JPLPTA-11 in <b>WB8.1.31 The Applicant's Response to Deadline 4 and Deadline 4A Submissions [REP5-038]</b> .

#### Sally Ann Constable [REP5-076]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
SC-01	Cumulative Impact	Visual Impact Cumulative impact	This whole process of making a comment appears to have been designed to be so complex that no one can navigate the process and show any form of objection. It appears that the planning inspectorate are blinding ordinary citizens with an impossible situation in order	Please refer to the Applicant's response to food security at SOI-01, landscape impacts at LAN-01 and cumulative impact at GEN-01 in <b>WB8.1.19</b>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
	Loss of agricultural land  Cultural Heritage	Food security  Historic Environment	to prevent them from making objections. We are the owners of a cafe in the centre of the village of Sturton by Stow and the conversations we have had with villagers have revealed that local people find this is a pre-determined process and that there is no point in making objections to massive industrialised solar farms surrounding not only the village but also the whole way to the nearest town of Gainsborough. This will be a scar on the countryside for miles with hideous unsightly solar panels ruining the farmland which will never be restored and eventually become brown field sites. Lincolnshire has always been the 'bread basket' of England and now it will be totally industrialised. This is such a short sighted development just 'oiling the wheels of commerce' and big commercial companies making profits at the expense of the inhabitants of the area and cynically robbing farmers of their land because farming is no longer supported. We already have hungry people in our community and especially in Gainsborough where food banks are relied upon. This massive loss of land to agricultural use can only impact food prices ultimately and cause them to rise. The need for cheap imports will increase and this will impact our environment as food miles increase. Cheap imported foods do not have the food standards of those produced in the UK. The whole process is immoral	<b>Response to Written Representations at Deadline 1 Part 3 [REP3-036].</b>  As detailed in <b>6.3.13.5 Environmental Statement - Appendix 13.5 Heritage Statement [APP-117 to APP-119]</b> there is no visibility between Stow Minster and Coates Church and the Scheme, and therefore no resultant impact.

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>because cheap imports then deny the poorest and most needy people in the world of food.</p> <p>The views from the air we have seen of these massive solar farms show that beautiful medieval land marks will be completely surrounded and there are significant buildings in this area such as Stow Minster (older than Lincoln Cathedral) and Coates church which is older than the Catholic Church in this country. It is truly heart breaking and soul destroying that all these sites are being proposed and considered in such a mass in our location and the removal of our beautiful landscapes from our community. There are surely many more suitable places for solar panels than a whole region of Lincolnshire - roof tops of industrial buildings and every house top and brown field sites but not land that could produce food</p>	

**Philip Hodgkinson [REP5-079]**

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
PH-01	Landscape and Visual	Visual Impact at Broxholme  Cumulative impact	<p>I have two further points to add .</p> <p>IGP have shown poor mitigation in the light of all the concerns about the visual impact on Broxholme by WB1 solar power plant .</p>	<p>The Scheme has been iteratively designed to provide a 50m offset from the curtilage of nearby residential properties. To the east of Broxholme, this has resulted in panels being offset by approximately 93m from the nearest residential dwelling.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>Secondly with 10-13000 acres of proposed industrialised solar plant activity in open countryside within a 6 mile radius , the cumulative impact is monstrous .</p> <p>We are relying on the Inspector taking this simple point wrapped up in a mass of detail</p>	<p>Detailed landscape proposals are shown on <b>6.4.8.18.1_A to 6.4.8.18.3_A Landscape and Ecology Mitigation and Enhancement Plans (Figures 8.18.1_A to 8.18.3_A) [REP1-026, REP1-028 and REP1-030]</b>. As part of the landscape scheme for the WB1 Site, a 50m wide landscape belt comprising of miscanthus, scrub, native woodland and tussocky grassland is proposed along the Site's western boundary. This mitigation planting would be perceived as an extension of the adjacent tree cover and existing field boundaries and once established views of the solar array would become screened.</p> <p>A cumulative effects assessment is available <b>6.2.1-6.2.23 Environmental Statement [APP-038 to APP-061, REP1-012, 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. 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>

**Mark Wardle [REP5-075]**

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
MW-01	General	<p>Food security</p> <p>Carbon footprint</p> <p>Biodiversity and Ecology</p> <p>Landscape impacts</p> <p>Fire Safety</p>	<p>My name is Mark Wardle and I am a resident of West Lindsey and I wish to reiterate my grave concerns over this overwhelming development.</p> <p>My concerns are many fold including the decommissioning of thousands of acres of active and productive arable farmland, with food security a paramount concern for the future, why takeaway our ability to produce our own crops? the deficit will mean relying on vast quantities of foreign products that requires vast amounts of transportation to supply the UK.</p> <p>The untold damage do to the local ecosystems by fencing vast tracts of wildlife habitat, whose inhabitants require the ability to move freely in order to proliferate, such the endangered Brown Hare, game birds such as Pheasants and Partridges, deer and others. The removal of hedgerows and trees within the development boundaries.</p> <p>The visual aspect of huge areas of the landscape would be totally transformed by millions of solar panels and the effects this would have on local communities living close to the development site. The very real concerns over the battery storage systems.</p>	<p>Please refer to the Applicant's response to carbon at CLI-01, food security at SOI-01, biodiversity at ECO-01, landscape impacts at LAN-01 and fire safety and pollution at OEM-02 and OEM-03 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>The fire risk and subsequent release of combustion contaminants released by these systems has been highlighted by various fire authorities and experts.</p> <p>It is well documented that solar systems are highly inefficient due to their very nature so why destroy vast areas of the environment to build these systems is a folly.</p> <p>Thank you for you taking time and consideration by reading my grave concerns I have mentioned now and in past representations.</p>	

**Julian Plews [REP5-072]**

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
JP-01			<p>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.</p>	<p>The Applicant refers to its response to JPLPTA-01 to JPLPTA-11 in <b>WB8.1.31 The Applicant's Response to Deadline 4 and Deadline 4A Submissions [REP5-038]</b>.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>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. However this is not the whole picture since there are potentially 9 or more projects covering some 27,000 to 30,000 acres. It is clear that more and more farmers and landowners are being approached to lease their land for solar development.</p> <p>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". 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</p>	



Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>demand is at its highest, on winter evenings, they produce nothing at all.</p> <p>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 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</p>	

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>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.</p> <p>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> <p>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</p>	

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>surrounded by miles of fencing, without damaging habitat. And this construction would take between 5 to 7 years to complete. 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> <p>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.</p> <p>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? Whilst the pictures of sheep grazing the land suggest an idyllic pastoral scene they are probably the only animals that could graze without damaging the solar panels. Unfortunately, this image presumes that there are farmers that would want to farm sheep and it is well</p>	

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>known that sheep are the hardest to manage successfully and have a high death rate. It also assumes that sheep farmers can make a profit and with feed costs high (imported as land is under solar panels) this is highly unlikely.</p> <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 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.</p> <p>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.</p> <p>I strongly urge that this proposal be rejected.</p>	

**Claire Thomson [REP5-065]**

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
CT-01	General	Scale	The proposal is excessive and the resulting loss of valuable agricultural land is counter to any sustainability	Please refer to the Applicant's response to cumulative impacts at GEN-01, rooftop solar at ALT-

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
		Rooftop solar Food security	goals. There are other locations in which solar panels can be located to promote green energy use e.g., all new-builds, domestic, commercial, and industrial. The cumulative, negative impact of large-scale solar farms across the UK is massive – as a country we should be seeking greater self-sufficiency in terms of food production – if food supplies have to constantly be imported this has a negative impact on the environment. The UK should seek solar power across all new builds, and seek to retain valuable agriculture land for food production.	01 and food security at SOI-01 in <b>WB8.1.19 Response to Written Representations at Deadline 1 Part 3 [REP3-036]</b> .

#### Katharine McIlroy [REP5-073]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
KM-01	Scale	Cumulative Rooftop solar Traffic	<p>I wish to comment again, on the West Burton Solar project, as I have done for almost the last 3 years. Ticking the boxes and trying to understand this complicated and poor method of communication.</p> <p>The size and scale of this monstrous project is totally beyond comprehension.</p> <p>Solar should first be placed on roof tops, as seen in other countries.</p> <p>The cumulative impact on these small rural communities and farms will be huge. The farms and</p>	<p>Please refer to the Applicant's response to cumulative impacts at GEN-01, rooftop solar at ALT-01, food security at SOI-01, rural economy at STR-01, transport at TRA-01 and wind as an alternative at ALT-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>experienced farmers will disband forever, causing more food imports and rise in food prices.</p> <p>The infrastructure barely supports traffic movements as it is. A small incident regularly causes a major holdup and flooding in this local area can mean 2 out of 3 roads will close.</p> <p>In the right place a solar generating plant will produce a small amount of power, but here is the wrong place and the destruction caused outweighs any gains it might make.</p> <p>IF THE PLUG IN POINTS dictate where the sites are located, then why are wind farms out at sea. Clearly, undersea cables work here. The importance of nature cannot be underestimated and turning our countryside into industrial power plants will badly affect mental and physical health.</p>	

**Dianne Ayres [REP5-067]**

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
DA-01	Biodiversity and Ecology	Yellow Hammers	I'm extremely concerned about the adverse impact of the solar farms on our wildlife. In particular the loss of habitat for yellow hammers. These are seen on the hedges near the proposed site and are a UK Birds of Conservation Concern, Red List status. We must do all	Yellowhammer were recorded in strong numbers during the baseline breeding bird surveys which underpin the DCO application (see para. 9.5.122-9.5.142 of <b>6.2.9 Environmental Statement - Chapter 9 Ecology and Biodiversity [APP-047]</b> ).

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>we can to prevent any further decline and the destruction of our farmland.</p>	<p>These birds nest at hedgerow bases and on ditch banks in arable farmland, while they forage typically within field margins on seeds and small invertebrates. All hedgerow habitat will be retained and enhanced (allowed to grow tall and bushy) save for a small number of new field accesses for construction. All field margins and ditches will be retained, with field margins being significantly widened from around 2m or less to between 5 and 12m. These habitats will be specifically managed for the benefit of wildlife including species such as yellowhammers by encouraging a diversity of flowering and seed-bearing plants and habitat for invertebrates. Furthermore, the cessation of arable cultivation, harvesting and crop spraying will result in the provision of approximately 600ha of grassland of value to invertebrates during the operation of the Scheme.</p> <p>These measures are set out in the <b>Outline Landscape and Ecological Management Plan [EX6/WB7.3_E]</b> and will be secured through Requirement 7 in Schedule 2 of <b>3.1 Draft Development Consent Order [EX6/WB3.1_G]</b>.</p>

**Pauline Organ [REP5-078]**

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
PO-01	General	Cumulative Socio- economics Food Security	<p>I oppose this project as the cumulative impact on a 6 mile radius is beyond reasonableness.</p> <p>There is great collateral damage caused by the construction routes and cable routes.</p> <p>There will be enormous loss of habitat and recreational space, peace and quiet,.</p> <p>The panels have limited life, require many non-renewable materials to make and pose disposal problems at the end of their life</p> <p>The greatest concern is the loss of food-producing land at a time of increasing import costs, reduction of foreign food due to climate change, war, earthquakes</p> <p>This development must not go ahead</p>	<p>Please refer to the Applicant's response to cumulative impacts and recreational impacts at GEN-01, ecological impact at ECO-01, lifespan of solar panels at GEN-05 and food security at SOI-01 in <b>WB8.1.19 Response to Written Representations at Deadline 1 Part 3 [REP3-036]</b>.</p>



## 4 Applicant's Responses to Additional Submission Accepted by the Examining Authority

### 4.1 Submissions by Parish Councils and Statutory Bodies

#### United Kingdom Atomic Energy Authority [AS-066]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
UKAEA-01	General	Introduction	<p>These further written representations are made on behalf of the United Kingdom Atomic Energy Authority ('UKAEA') in accordance with rule 10 of the Infrastructure Planning (Examination Procedure) Rules 2010 ('Further Representations').</p> <p>These Further Representations follow, and should be read together with, the representations made on behalf of the UKAEA ('Representations') on 15 March 2024 in accordance with Deadline 4A (REP5-005). The purpose of these Further Representations are as follows:</p> <ul style="list-style-type: none"> <li>a. Provide to the Examining Authority's ('ExA') the protective provisions which the UKAEA will seek to be secured through the development consent order ('DCO') in the event that a voluntary agreement cannot be reached with the Applicant.</li> <li>b. Provide further background information as to UKAEA's objection to the use of compulsory</li> </ul>	The Applicant notes this comment.

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>acquisition ('CA') powers over land at West Burton Power Station in which it holds an interest. The UKAEA considers that this information will assist the ExA in understanding the UKAEA's objection prior to its attendance at the compulsory acquisition hearing on 23 April 2024 and provide context for the protective provisions sought.</p> <p>c. To comment briefly on the ExA written Question 1.4.7 and EDF Energy (Thermal Generation) Limited's ('EDF') response to this question, which was submitted on 9 January 2024 in accordance with Deadline 3 (REP3-052).</p>	
UKAEA-02	General	Relevant Background	<p>As explained in the UKAEA's Representations, the UKAEA holds an interest in land at West Burton Power Station pursuant to an Option with EDF dated 3 October 2022. The background to the UKAEA's statutory functions is set out in section 2 of the Representations and is not repeated in detail here. At paragraph 2.4 of the Representations, it was explained that the UKAEA's interest in land at West Burton Power Station was the result of a nationwide site selection process, by which it sought a suitable site for the delivery of its ground-breaking Spherical Tokamak for Energy Production</p>	The Applicant notes this comment.

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>('STEP') prototype fusion energy plant. The nature of that process provides context for the importance of this particular site to the UKAEA's functions and the delivery of its STEP programme, and therefore the need for protective provisions in the form sought by the UKAEA.</p>	
UKAEA-03	General	Site Selection Process	<p>The site selection process was launched by the Secretary of State in December 2020 and ran for a period of nearly two years. The process sought nominations of sites to host the STEP plant from site owners and stakeholders. A total of fifteen sites were put forward, including the site at West Burton, which was nominated by a team led by Nottinghamshire County Council. A shortlist of five sites was produced, which were subject to a more detailed evaluation. The evaluation included a range of criteria such as technical and operational feasibility, the potential for the delivery of socio-economic benefits for the region, and alignment with national policies and priorities. The evaluation demonstrated that, whilst all five sites were feasible as locations for STEP, the West Burton site had significant advantages over the other short-listed sites and presented fewer risks to delivery.</p>	The Applicant notes this comment.

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>In October 2022, the Secretary of State announced that the West Burton site had been selected for the STEP programme.</p>	
UKAEA-04	General	Early Site Investigations	<p>In the period of some 18 months since the announcement and conclusion of the option agreement with EDF, the UKAEA has established an operational base at the site from which it has been carrying out site characterisation and due diligence. Studies carried out to date have demonstrated that outside the existing power station, the site has ecological and biodiversity sensitivities that will have to be managed in the development. Geotechnical and geophysical studies, which will provide full geological mapping of the site, are ongoing. Geological stability is essential for the project and the early geological studies will identify and characterise geological features which will impact the layout and design of the plant. The final location of the STEP plant within the West Burton site will depend on the results of these ground investigations.</p> <p>The early investigations have demonstrated that the site is constrained in a number of respects. In addition to the geological and ecological constraints referred to above, this includes</p>	<p>The Applicant continues to work with the UK AEA and discussions will continue after the Examination has closed.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>cultural heritage assets within the site, flood defence requirements and the presence of other site users. In particular, the layout of the site will continue to be constrained by the 400kV and 132kV National Grid substations and need for other users to access these substations. Other users of the site who require access include West Burton Energy, Severn Trent Water, Trent Valley Internal Drainage Board and the Environment Agency. In addition, new projects in the area (including solar projects 3 DCO: EN010132 (West Burton Solar): Further written representations such as the West Burton Solar Project) which require access and easement rights. EDF does and will continue to require access by contractors to carry out the commercial extraction of ash on site. The need to take into account the requirements of all these co-users and new projects place further constraints on the STEP development.</p> <p>Baseline study work will continue over the next two years to inform the masterplanning of the site. The UKAEA currently anticipates that major engineering and construction partners will join the project in early 2026, at which point the project will receive a significant injection of</p>	

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>resources and an increase in the rate of project development.</p> <p>At present, therefore, there can be no certainty about the location of the plant within the site. Early masterplan sketches have indicated that the plant may be situated to the north of the site, however, no final decision can be taken until the baseline studies have been completed to inform option selection studies. It is anticipated that the footprint of the plant and the layout of the site will not be fixed before approximately 2027. It should also be noted that even if the plant is located to the north of the site, the southern area will be required for construction areas (laydown areas, offices, contractor facilities, etc).</p> <p>Until such a time that the option selection studies have been completed, it is essential that the UKAEA retains flexibility to situate the plant in the most suitable location within the site in order to reduce long term risks to the project. The UKAEA seeks to avoid a situation in which other statutory undertakers' apparatus constrains the future siting of the plant and ultimately conflicts with its optimal positioning. It is for this reason that the UKAEA seeks</p>	

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>protective provisions to safeguard its future operations at the site, as explained further below.</p> <p>Finally, the UKAEA notes that the ExA has sought clarification from EDF in its written questions as to the impact of the scheme on its undertaking. In its response, EDF referred to the future development of the site and explained as follows:</p> <p>“The West Burton A site has also been selected by the UK Atomic Energy Authority for the development of the UK’s first Nuclear Fusion Plant, with the potential to yield significant quantities of low carbon energy, generate employment opportunities and encourage investment in the region. EDF wishes to facilitate the implementation of this project and any other potential future development opportunities at the site. It is therefore imperative that the proposed cable route for the Project does not sterilise development land or detract from future development plans.” 4 DCO: EN010132 (West Burton Solar): Further written representations</p> <p>The UKAEA endorses and echoes EDF’s concerns about the effect of the cabling on constraining</p>	

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			development of the site for the reasons explained above.	
UKAEA-05	Draft DCO	Protective Provisions	<p>The UKAEA does not object in principle to the scheme. The UKAEA recognises the benefits of the scheme and supports the principle of delivering renewable energy generation projects. The UKAEA has already worked with other developers in the area to facilitate similar solar projects which require easement rights.</p> <p>However, the UKAEA considers it necessary for the protection of the future delivery of the STEP programme that protective provisions be included within the draft DCO. It is the UKAEA's position that in the absence of a voluntary agreement with the Applicant, protective provisions are necessary and reasonable to avoid an adverse impact on and serious detriment to the UKAEA's future operations.</p> <p>The UKAEA has been engaging with the Applicant as to the form and content of the proposed protective provisions but to date, the draft DCO does not contain agreed protective provisions for the protection of the UKAEA to its satisfaction. The draft protective provisions enclosed with these Further Representations are accompanied by a comparison version which</p>	<p>The Applicant refers to its submissions made during ISH6, CAH2 and OFH3, which are summarised in <b>Written Summary of the Applicant's Oral Submissions at the Additional Hearings (ISH6/CAH2/OFH3) [EX6/WB8.1.37]</b>.</p> <p>The <b>draft DCO [EX6/WB3.1_G]</b> contains protective provisions for the benefit of UK AEA. The Applicant agrees to all of UK AEA's proposed changes, except paragraph 5. The Applicant cannot agree to paragraph 5 as it needs to retain compulsory acquisition powers to ensure deliverability of the Scheme as it has not yet been able to reach a voluntary property agreement with the current landowner, EDF. The Applicant's position on paragraph 5 is outlined in more detail in Item 4 of <b>Written Summary of the Applicant's Oral Submissions at the Additional Hearings (ISH6/CAH2/OFH3) [EX6/WB8.1.37]</b>.</p> <p>The Applicant continues to work with the UK AEA and discussions will continue after the Examination has closed.</p>



Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>shows the amendments UKAEA seeks to those draft protective provisions proposed to UKAEA by the Applicant. The amendments suggested are modest, and the justification for the changes is set out within the appended documents. Further engagement will take place with the Applicant, and an update can be provided during the Compulsory Acquisition Hearing.</p> <p>The key issue that it is expected will not be resolved is the inclusion of paragraph 5 of the enclosed protective provisions, which would provide that the Applicant's powers of CA could not be exercised over land in which UKAEA has an interest, without the UKAEA's agreement. The Applicant indicates that would only be agreeable once it has reached agreement with EDF (the current freeholder). It is UKAEA's case that the rights sought by the Applicant are available on a voluntary basis, and CA powers are not therefore justified. If they are to be justified, this paragraph 5 should be included as a minimum reasonable safeguard for its future use of the site by the UKAEA, for the reasons outlined above.</p>	

UKAEA-06	Draft DCO	PP for UKAEA Para 1.(1)	<p>The UKAEA has existing facilities within the wider West Burton site, and it is therefore essential that the provisions of this part which relate to access to that site being maintained are effective immediately.</p> <p>It is accepted that the provisions relating to "specified works" need not apply until the UKAEA has taken its interest in the land affected by the DCO.</p> <p>Para 1 has been amended accordingly, alongside variations to the definitions of West Burton Power Station and the new term UKAEA Land.</p>	<p>The Applicant is agreeable to the proposed changes to paragraph 1 of the protective provisions and has included these amendments in the draft DCO submitted at Deadline 6.</p>
UKAEA-07	Draft DCO	PP for UKAEA Para 5.	<p>As it is unlikely that the EDF voluntary agreement will be concluded prior to the end of the Examination, the Applicant cannot agree to this restriction on the use of CA powers. However, if a voluntary agreement is reached prior to the SoS making a decision then we would be willing to agree to the wording in brackets being included in the Order.</p> <p>It is essential to UKAEA that this provision is included. It should not be prejudiced by the Applicant's failure to concluded commercial negotiations prior to the close of examination, when it is understood that in principle all</p>	<p>The Applicant does not agree to this paragraph and refers to its response to reference UKAEA-05 above in this document.</p>

			relevant parties are willing to grant the necessary rights on a voluntary basis.	
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## 4.2 Submissions by Affected Persons, Interested Parties and other Members of the Public

### Christine Warren [AS-069]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
CWa-01	Principle of Development Site Selection	Overdevelopment of West Burton Power Station	<p>Can I ask why in the last meeting was the impact on the area of combined projects removed from the agenda if it was not relevant?? No one is looking at all the projects in the area and what each project is doing to the environment and the area.</p> <p>It will be too late if someone does not look at the big picture and not just one project. The planning inspectorate is failing in its duty to myself and the environment. Please I ask that you look just for an hour at the projects and the impact they are having. Who made the decision to over industrialise around my home just to get to the grid??</p> <p>[REDACTED] affected by the inability to find anyone who is interested in the impact it is having on my life. I ask that the planning inspectorate once again that they walk the land with me and look at what is happening.</p>	<p>The matters relating to cumulative impact were moved from ISH4 to ISH5. The summary of the Applicant's oral submissions and responses to action points from ISH5 can be found at item 5 in <b>WB8.1.32 Written Summary of the Applicant's Oral Submissions and Responses at Issue Specific Hearing 5 and Responses to Action Points [REP5-037]</b>.</p>
CWa-02	Ecology and Biodiversity	Impact on animal life	<p>I have a very nervous dog. It hates cars. It is loved and never harmed but I can't stop her being nervous. I can only protect her. What do you think the animals in the areas which are being destroyed</p>	<p>The Applicant notes this comment.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			for so called progress feel. They is no on protection them.	
CWa-03	Ecology and Biodiversity	Impact on hedgerows	The hedge rows which make the planet carbon neutral are being ripped out and by each project. They are then replaced with Hawthorn quicks. Sticks which will take 20 years to put back the hedge being destroyed. I ask please do something before it is too late.	The Applicant has produced Hedgerow Removal Plans which form Appendix C of <b>Outline Landscape and Ecological Management Plan - Revision E [EX6/WB7.3_E]</b> providing indicative details of the hedgerows that are currently proposed to be removed temporarily to facilitate the construction of the Scheme and those that are currently proposed to be removed during the occupational life of the Scheme. The final Landscape and Ecological Management Plan that is secured through Requirement 7 of the <b>DCO [EX6/WB3.1_G]</b> will need to set out the final details for hedgerow removal and will be approved by the relevant planning authority.

**Catherine Malcolm [AS-067]**

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
CMa-01	Principle of Development	Cumulative Effects	As a keen local Rambler I often walk in this area, I live close by on the border of Nottinghamshire. The affects of this application cannot be taken in isolation ALL of the proposed solar panel proposals need to be taken as a whole and the cumulative impact on local people, businesses and especially food production considered.	Please refer to GEN-01 in <b>WB8.1.19 Response to Written Representations at Deadline 1 Part 3 [REP3-036]</b> and 7A-01 in <b>WB8.1.31 The Applicant's Response to Deadline 4 and Deadline 4A Submissions [REP5-038]</b> .
CMa-02	Principle of Development	Impacts of development on rural communities	Why are tracts of decent land being covered by solar farms when the government could legislate to put solar panels on all new homes. I fear that the answer is profit - profit for the developers and profit for the land owners and profit for the housing developers. Rural communities have been ignored in recent times by bodies such as yourselves. We are being asked increasingly to give up our way of life for providing energy and raw materials for city dwellers. A balance needs to be had in all things and these proposed developments combining thousands of acres in a relatively small area are un-balanced.	The Applicant refers to their previous responses in relation to alternative sites for solar installation at ALT-01 in <b>WB8.1.19 Response to Written Representations at Deadline 1 Part 3 [REP3-036]</b> .
CMa-03	Energy Need Alternatives and Design Evolution	Efficiency of Solar	Everyone knows the shortcomings of solar. When power is actually really needed when it is cold and or dark it doesn't produce. If solar is really the answer why aren't the government providing subsidies to allow homeowners to install solar. This is about taking the easy option to tick net zero boxes and to make	Please refer to ALT-02 in <b>WB8.1.19 Response to Written Representations at Deadline 1 Part 3 [REP3-036]</b> .  Appendix B to <b>8.1.6 Written Summary of the Applicant's Oral Submissions &amp; Responses at Issue Specific Hearing 1 and Responses to</b>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			profit for the wealthy at the expense of ordinary people.	<p><b>Action Points [REP1-052]</b> (Chapter 8 – Decarbonisation can maintain or enhance Security of Supply) describes the changing nature of the UK's electricity system and therefore why these comments are not an accurate representation of the UK's future energy system.</p> <p>Chapter 10 of <b>Statement of Need [APP-320]</b> describes that solar power is economically efficient in the UK. Figure 10.5 of Statement of Need shows that delivering large schemes deliver incremental carbon benefits to delivering the same capacity over multiple smaller schemes, and at a lower overall cost, a fact which is reflected in the government's action to remove subsidies from solar power projects and close the Feed In Tariff scheme to new solar projects.</p> <p>The Scheme, if consented, will deliver significant decarbonisation, security of supply and affordability benefits to the UK from as early as its Grid Connection date in 2028.</p>
CMa-04	Principle of Development	Impacts of development on rural communities	When is the wellbeing of local people going to be factored into these decisions. This is plea from the heart which many, many rural residents feel - we are being exploited to make others rich	<p>Please refer to STR-05 in <b>WB8.1.19 Response to Written Representations at Deadline 1 Part 3 [REP3-036]</b>. The Applicant has also produced <b>6.2.21 ES Chapter 21: Other Environmental Matters [APP-059]</b> and <b>Environmental Statement Addendum 21.1: Human Health and</b></p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				<p><b>Wellbeing Effects [REP44-077]</b>, which outline the human health and wellbeing impacts of the Scheme.</p>



**Christine Hogg [AS-070]**

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
CHo-01	Principle of Development	Scale of Scheme	<p>I wish to make my feelings known about the solar panel submission. The size and scale of the proposed development is totally inappropriate in my opinion.</p> <p>I am not against renewable energy and new ideas but the share scale of this solar panel development is a monstrosity.</p>	<p>Please refer to GEN-01 in <b>WB8.1.19 Response to Written Representations at Deadline 1 Part 3 [REP3-036]</b>.</p>

Iain Tatam [AS-068]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
ITa-01	Principle of Development	Objection to Scheme	I grew up in Harpswell on the edge of the 'Tillbridge' part of the proposed West Burton Solar Projects and would like to have my say about why I don't believe these projects should be approved in their current form.	The Applicant notes this comment.
ITa-02	Principle of Development Climate Change Energy Need	Sourcing of materials	<p>Simon Michaux is a Associate Professor at Geological Survey Finland and has done extensive work on 'minerals being the new oil,' including numerical breakdowns of the amounts of precious metals needed for the planned transition the Green Energy by 2050.</p> <p>In his conclusion he notes:</p> <p>The planned Green Transition is not feasible in context of the size of the task, and the required raw materials.</p> <p>Mining production, reserves and resources are all facing shortfalls.</p> <p>The needed power storage buffer to manage intermittent supply from wind and solar systems has been overlooked and is a current blind spot in the phase out of fossil fuels.</p> <p>Until the issues raised are resolved, wind and solar are not viable as the primary energy generation system for the next industrial era.</p>	<p>The Applicant notes this and please refer to the Applicant's responses below.</p> <p>In terms of intermittancy of supply, the Applicant refers to its response to reference 7A-085 in <b>WB8.1.18 Response to Written Representations at Deadline 1 Part 2 [REP3-035]</b>.</p>
ITa-03	Principle of Development	Sourcing of materials	The graphs he uses in this presentation can be found in his report here: <a href="https://www.gtk.fi/en/current/there-are-bottlenecks-in-raw-materials-supply-chain-a-glimpse-of-the">https://www.gtk.fi/en/current/there-are-bottlenecks-in-raw-materials-supply-chain-a-glimpse-of-the</a>	Chapter 11 of <b>7.11 Statement of Need [APP-320]</b> describes the need for flexibility to support the operation of

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
	Energy Need		<a href="#">systemic-overview-is-here-discussion-and-the-development-of-the-solutions-have-started/</a>	<p>high-renewable future power systems and at Para 11.2.6 states that National Grid's "most recent [Future Energy Scenarios] predicts that storage will be required across hydrogen, heat, carbon and electricity to efficiently manage flexible supply and demand."</p> <p>The Scheme's grid connection agreement provides 20MW of import power capacity which explains the inclusion of 20MW of battery electricity storage capability as part of the Scheme.</p> <p>As a large-scale solar generation asset, the Scheme is fully aligned with the national ambition for the development of a hydrogen economy, where hydrogen production has a zero carbon footprint, and supports inter-seasonal storage using raw materials with no rare earth metal mining requirements.</p> <p>Government's analysis concludes that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind <u>and solar</u>" [NPS EN-1 (Jan2024), Para 3.3.20, Applicant's emphasis]. It therefore</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				<p>follows that the Scheme will, if consented, mark a critical step in delivering on a pathway to a sustainable future.</p> <p>The Scheme holds an offer from National Grid to connect at West Burton in 2028, providing decarbonisation, affordability and security of supply benefits to the UK in the critical 2020s.</p>
ITa-04	Principle of Development Climate Change Energy Need	Shortfall in meeting energy requirements	To be clear, when he says that we're 'facing shortfalls' he's not talking about running just slightly short. If you take a look at the table put up at 10:56, with a 28 day buffer used to try and cover the intermittency of wind and solar (which he goes on to show isn't enough of a buffer in itself) then it'd take over 13,000 years to mine the Lithium needed to reach the 2050 targets at the 2019 (pre-Covid) production rates! This isn't just a shortfall but a HUGE ramp up production that just isn't feasible when considering how much it takes to set up new mines. This shortfall is summed up best (imo) visually by the graph he puts up at 15:06, which compares the amount of estimated resources and global reserves with the quantities of the main metals that would be required to make the buffer needed. Even if you build the mines to extract it all then it's not even close! It may be possible to get the required metals for this particular project by getting in there first, but pretending that that is part of a grand saving of the planet is not even	<p>Please see comment to ITa-03.</p> <p>It is anticipated by the Applicant that the global supply chain for all components of the Scheme will adapt to increased demand. As for the minerals used in the energy storage aspect of the Scheme, technology is rapidly progressing, and there may be a choice of different energy storage technologies available to the Scheme at the time of construction. Please refer to paragraph 1.1.7 of WB7.9_A Outline Battery Storage Safety Management Plan Revision A <b>[REP3-032]</b> where it is stated that the final battery chemistry will be confirmed as part of the detailed design prior to the</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			remotely possible in this context. Ignoring these issues would seem to me to scream of financial profit at the expense of the planet.	commencement of construction, but will include lithium ion battery cell types.
ITa-05	Principle of Development Climate Change Energy Need	Energy policy	Now obviously I'm only putting down his conclusions and a couple of small things out a large volume of work he's done in his report. While I'm not expert enough to confirm or deny his figures, the report is clearly a very thorough piece of work. He says during the Q+A towards the end that about 30% of his presentations of this report were made to government officials, who didn't deny the truth of what he's saying but pushed back anyway as they weren't sure what else to do. As he points out though, good policy and actions aren't built by ignoring the facts to fit ideology. He says he's happy for people to challenge his models as it helps build accurate ones, which is what's needed to in order to make good decisions. I urge you to do so.	Please see comment to ITa-03.
ITa-06	Principle of Development Climate Change Minerals	Ethical and environmental concerns regarding sourcing of materials	Secondly, there is the destruction that would undoubtedly be caused by the additional mines themselves. If you look at the mines that are already currently already producing the world's tech resources then comes impossible to ignore the amount of damage they do. The vast bulk of "rare earth" minerals currently produced are done so in China. An estimated 95% according to this BBC article: <a href="https://www.bbc.com/future/article/20150402-the-worst-place-on-earth">https://www.bbc.com/future/article/20150402-the-worst-place-on-earth</a>	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. The Applicant can confirm that no solar PV panel or BESS manufacturers or suppliers have been

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			<p>If their figures are accurate then 70% of the world's reserves are held in the Bayan Obo mines in Mongolia. The 'Toxic Sludge Lakes' are not only giving 30-40% of villagers in surrounding villages cancer, they are leaching towards the Yellow River, China's biggest river that supplies 100's of millions of people, and from there out into the sea.</p> <p>Then there's the Cobalt mines of Congo:  <a href="https://www.amnesty.org/en/documents/AFR62/7009/2023/en/">https://www.amnesty.org/en/documents/AFR62/7009/2023/en/</a>  <a href="https://www.independent.co.uk/climate-change/news/phone-electric-vehicle-congo-cobalt-mine b2277665.html">https://www.independent.co.uk/climate-change/news/phone-electric-vehicle-congo-cobalt-mine b2277665.html</a></p> <p>Virtually all of our tech uses Cobalt and the Democratic Republic of Congo produces about 70% of it. The country has an estimated 2 million 'Artisanal' miners, including great numbers of children that work in hellish conditions to help produce our 'Green' technology. Forced evictions, rape, child labour, constant breathing of toxic fumes that cause severe health conditions and birth defects....</p> <p>The point in stating these grim conditions is that the current squeaky clean image of solar, wind and other 'Green Tech' is very much a case of out of sight, out of mind. The reality of them includes environmental destruction and human rights abuses, and this is just at their current very sizeable levels. Couple this destruction with the levels of mining Simon Michaux states you'd need to reach the 2050 targets and you're looking at destruction that would adversely affect the planet and everyone/everything on it! Amnesty's question of</p>	<p>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>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			'Powering Change or Business as Usual?' seems to me to be grossly tipped in favour of Business at the expense of all.	
ITa-07	Alternatives and Design Evolution  Landscape and Visual Impact	Visual impacts of Scheme	Thirdly, I'm scared of losing the Countryside I grew up with and the mental health effects that would have on those I've known and loved all my life! The claims that these Solar Industrial Estates (let's call them what they are) will be barely seen and actually improve biodiversity seem to me to be absurd nonsense claims. Lincolnshire is flat. Very flat. Virtually the only hill in the county (apart from the Wolds) is right behind my house and runs to Lincoln in one direction and further past us for miles in the other. If you're on that hill then it looks out onto the flats of Lincolnshire for vast distances. Looking down onto a 10,000-odd acre sea of grey shiny industrial panels surrounded by 80-odd km perimeter of guarded fences wont' just be noticeable, it will completely change the character of the countryside into something that can barely claim that definition!	Please refer to the Applicant's response to GEN-01, LAN-01 and LAN-02 in <b>WB8.1.19 Response to Written Representations at Deadline 1 Part 3 [REP3-036]</b> .
ITa-08	Health and Wellbeing	Living within, and access to countryside	People from and living in the countryside love being there because they are open spaces that are in touch with the rhythms of nature. The pace is slow and the earth's cycles and the changing of the seasons are felt all the more strongly for it. The idea that nature, or the people living next to or among them, will somehow flourish when surrounded by lines of tall metal structures stretching for mile after mile seems to me to be grossly unlikely. It has been shown in study after study after study that people greatly benefit from spending time in nature.	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-

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			Having that nature and the heritage they grew up with surrounded by 1000's of acres of industrial metalwork is likely to inversely damage them.	115 in <b>WB8.1.18 Response to Written Representations at Deadline 1 Part 2 [REP3-035]</b> .
ITa-09	Energy Need Agriculture and Soils	Food Security	Fourthly, Food Security. I'm sure there are plenty of people who will have pointed out the details and figures behind this area in much greater detail than I am currently able to - but it is of great concern to me. The stated reason for putting the solar on farmland rather than on rooftops, industrial sites and Brownfield is that sites need to have access to the storage facility. This assumes that the position of feeding the electricity into the grid is the best option. It would seem to make more sense to me to have smaller, decentralised power units that feed where the power is needed in a targeted way. The war in Ukraine has already disrupted the world's wheat supply, affecting food prices. Now more than ever it would seem to me to be essential to protect our food sovereignty, and taking away vast swathes of productive farmland before using rooftops, industrial land and Brownfield in a more targeted way doesn't seem to me the way to go on that front.	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 8.1.2 <b>The Applicants Responses to Relevant Representations [REP1-050]</b> .  The Applicant refers to their previous responses in relation to alternative sites for solar installation at ALT-01 in <b>WB8.1.19 Response to Written Representations at Deadline 1 Part 3 [REP3-036]</b> .
ITa-10	Principle of Development	Energy Need Scale of the Scheme	Now I said at the start that I didn't approve of these solar farms 'in their current form.' To be clear, I'm not fully against solar, it's not just a case of NIMBY, and I currently live off a couple of panels and a couple of Lithium batteries myself. It is part of what we currently have and is part of a needed transition. Fossil Fuels are steadily dwindling and must be used wisely during this transition. I oppose these Solar Farms because I	Please refer to GEN-01 and ENE-01 in <b>WB8.1.19 Response to Written Representations at Deadline 1 Part 3 [REP3-036]</b> and the response to comment ITa-04 in this document.



Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			don't see them as a solution due to constraints of the minerals/metals supply and buffer needed and the scale of them. I believe they could do great damage in multiple areas.	
ITa-11	Alternatives and Design Evolution	Alternative renewable energy sources	On the whole though, I like to try and be an optimist in life. While the challenge is great, I do believe there is hope in alternative solutions. I picked the above video by Simon Michaux rather than others he's done because he does look at some other possibilities. Solar panels are improving in efficiency. Thorium reactors could produce energy much more safely and with much less waste than current nuclear reactors. Geothermal shows great potential, with yesterdays fossil fuel mines possibly becoming part of the solution. No one thing is the answer to all our problems, but I believe investing in the innovation to create the systems needed would be money much better spent than on millions of panels that will cause great destruction in their production and likely be obsolete within 10 years.	Please refer to ALT-02 in <b>WB8.1.19 Response to Written Representations at Deadline 1 Part 3 [REP3-036]</b> .
ITa-12	General	Concluding Remarks	For the above reasons I feel that building these solar projects would be financially motivated 'Business as Usual' rather than part of a real solution. I hope that you will look for ways that will benefit future generations rather than greenwashing inconvenient truths and leaving a mess that may damage our countryside for generations to come.	The Applicant notes this comment.

Mark Bagshaw [AS-071]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
MBa-01	Principle of Development Agriculture and Soils	Scale of Development Food Security	The size of these combined application is too much on good agricultural land. We are currently in the worse situation for many years regarding UK supply & security of our food. Lincolnshire being hit particularly badly.	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 8.1.2 <b>The Applicants Responses to Relevant Representations [REP1-050]</b> .
MBa-02	Energy Need	Effectiveness of solar power	Solar in any format just doesn't work, its just a licence to print money due to the way payments are currently configured to follow the gas price. It is barely effective on the best of days & doesn't suit the UK environment or weather patterns we experience	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> .

Michael Johnson [AS-072]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
MJo-01	Principle of Development Agriculture and Soils	Cumulative Development Food Security	The application does not include Steeple Renewables or Stow park which would give a total of 13,000 acres of industrialised solar zones within a 6 miles radius, which is a monstrosity, particularly at a time when the country is short of the food which this agricultural land is currently producing	The cumulative impact assessment of the Scheme has been updated to include Steeple Renewables and Stow Park and can be found in <b>WB8.2.5_A Technical Note on Cumulative Effects of Additional Schemes Revision A [REP5-030]</b> ; and <b>WB8.4.23.1 ES Addendum on Cumulative Effects [REP5-015]</b> .  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> .

**Raymond Stansfield [AS-075]**

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
RSt-01	Landscape and Visual Impact	Change to views from property and village	Should the above project go ahead Broxholme would be surrounded on almost 3 sides by a desert of black glass. From all the windows of my property (and many others)I would be have an industrialised vista in what was productive farmland.	<p>The Applicant refers to their previous responses in relation to alternative sites for solar installation at PRI-01 in <b>WB8.1.19 Response to Written Representations at Deadline 1 Part 3 [REP3-036]</b>.</p> <p>The Applicant also refers to its response to reference WLDC-09 above in this document.</p>
RSt-02	Socio-Economics, Tourism and Recreation  Human Health and Wellbeing	Mental Health Crisis and recreational access to countryside	You may be aware of what is being characterised as the "mental health crisis". It is recognised that one's environment has a profound effect on mental well being. There is a move away from pharmacological interventions to what is known as social prescribing. One of the commonest interventions in social prescribing is access to the open countryside. This indicates the pivotal role the environment has on psychological well being. Indeed ,many walkers, cyclists etc take advantage of this in Broxholme as it is.	<p>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>.</p>
RSt-03	Landscape and Visual Impact	Impacts of Scheme	Please take a look at the footage in the link below that illustrates the overpowering impact the West Burton project would have. <a href="https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010132/EN010132-001627-Lanpro%20%20Video%20Submission.mp4">https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010132/EN010132-001627-Lanpro%20%20Video%20Submission.mp4</a>	<p>The video referenced is the Applicant's submission of the aerial flyover submitted at Deadline 4 <b>[REP4-098]</b>.</p>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
RSt-04	Principle of Development Energy Need	Requirement for Scheme	Broxholme sits between the WB1 and WB2 sites. At our Parish meeting (minutes available) not one of the parishioners were in favour of the project. All were against our rural hamlet being despoiled. Against a backdrop of climate change alarmism, a cabal of solar farm carpetbaggers have got together with opportunistic absent landlords, to create wealth for distant elites with dubious claims of solar energy efficiency.	The Applicant notes this comment.
RSt-05	Principle of Development	Additional potential NSIP	A further group (Voltis Power) is currently "scoping out" an further massive development at Broxholme that would surround Cornhills Farm and cover to the southern horizon in Broxholme with black glass. This would constitute a 360 degree coverage of Broxholme.	As stated in the Applicants response to 7A-01 in <b>WB8.1.31 The Applicant's Response to Deadline 4 and Deadline 4A Submissions [REP5-038]</b> , 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 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).
RSt-06	Principle of Development	Cumulative effects of development	The submissions of the 7000acres group offer strong evidence of the low contribution solar power makes for the acreage it covers on previously productive	The Applicant refers to its response to reference 7A-156 in <b>WB8.1.18 Response to Written</b>

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			farmland. Please consider the cumulative effect of all of the above.	<b>Representations at Deadline 1 Part 2 [REP3-035].</b>

**Stephen Hogg [AS-076]**

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
SHo-01	Principle of Development Landscape and Visual Impact Agriculture and Soils	Cumulative Development Food Security	The sheer size and scale of the proposals has to be detrimental to the small scale local communities and will totally dominate and overwhelm the rural landscape of the Trent valley, in addition to the irreversible loss of potential agricultural land also required for an independent island economy.	The Applicant refers to their previous responses in relation to alternative sites for solar installation at ALT-01, LAN-01, LAN-02, SOI-01, GEN-01 and STR-01 in <b>WB8.1.19 Response to Written Representations at Deadline 1 Part 3 [REP3-036]</b> .

Sylvia Bone [AS-073]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
SBo-01	Agriculture and Soils Energy Need	Use of agricultural land	This planned solar farm will result in preventing good productive vegetable growing, it's planned to be on farm land that is at present growing vital crops that would otherwise have to be imported. It would mean destruction of land that is so productive when solar power can only be produced in summer time when power is used less.	The Applicant refers to their previous responses in relation to alternative sites for solar installation at SOI-01, SOI-02 and ALT-02 in <b>WB8.1.19 Response to Written Representations at Deadline 1 Part 3 [REP3-036]</b> .
SBo-02	Alternatives and Design Evolution Energy Need	Energy storage	Power produced in that way cannot be stored. What is the use of that? the country needs more power in the winter, so unnecessary to destroy farm land.	Section 11.5 in <b>7.11 Statement of Need [APP-320]</b> explains how electricity storage (BESS) will play an important role in the development of a low-carbon GB energy system. Electricity storage may be connected as a standalone asset or collocated with a renewable generation scheme. Because the Scheme's grid connection agreement provides both import and export capacity, it enables the Scheme to contribute to meeting the national need for electricity storage by including, as associated development, an electricity storage asset which supports the operation of the principal solar development and provides the ability to balance the electricity produced by the solar scheme, with demand on the National Electricity Transmission System.
SBo-03	Socio-Economics,	Agricultural employment	If it goes ahead, farmers will lose their livelihood and the country will be short of locally produced food. More imports just to line a few pockets!!	Please refer to the Applicant's responses at references STR-01 and STR-02 within <b>WB8.1.19</b>



Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
	Tourism and Recreation Agriculture and Soils	and food production		<b>Response to Written Representations at Deadline 1 Part 3 [REP3- 036].</b>
SBo-04	Principle of Development	Siting of solar development in countryside	Please consider stopping this solar monstrosity, country side is more important than lining a few pockets, these people give no thought to the country as a whole.	The Applicant notes this comment.

**Tracey Peden [AS-074]**

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
TPe-01	Principle of Development	Scale of Scheme	We as a family who have grown up in Lincolnshire in Glentworth and know the surrounding villages and countryside well are in turmoil at the proposed solar system on such a massive scale as this.	The Applicant notes this comment.
TPe-02	Alternatives and Design Evolution Energy Need Agriculture and Soils	Use of agricultural land	We strongly oppose this idea in all aspects why on earth on farmland? Our fields feed the nation?	The Applicant refers to their previous responses in relation to alternative sites for solar installation at SOI-02 in <b>WB8.1.19 Response to Written Representations at Deadline 1 Part 3 [REP3-036]</b> .
TPe-03	Alternatives and Design Evolution	Alternative Sites	There are plenty of other places that could be found and used without wrecking our beloved countryside and the wildlife within. Old RAF sites such as kirton Lindsey or hemswell or scampton raf would surely all be much better options.	The Applicant refers to their previous responses in relation to alternative sites for solar installation at ALT-01 in <b>WB8.1.19 Response to Written Representations at Deadline 1 Part 3 [REP3-036]</b> .
TPe-04	Alternatives and Design Evolution	Solar on rooftops	There are massive farm and storage units where you could use the roof to put panels on!	The Applicant refers to their previous responses in relation to alternative sites for solar installation at ALT-01 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
TPe-05	General	Impacts on way of life	Please please stand against this massive corporate madness for your constituents and your own grandchildren. I'm just back from a walk near your proposed areas where I see deer regularly, buzzards, kestrels etc etc we will be heartbroken if this goes ahead and feel so so disappointed in your decision.	The Applicant notes this comment.