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# **SCOPING OPINION:**

## **Proposed Cottam Solar Project**

**Case Reference: EN010133**

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Adopted by the Planning Inspectorate (on behalf of the Secretary of State) pursuant to Regulation 10 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

**09 March 2022**



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# 1. INTRODUCTION

- 1.0.1 On 27 January 2022, the Planning Inspectorate (the Inspectorate) received an application for a Scoping Opinion from Cottam Solar Project Limited (the Applicant) under Regulation 10 of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) for the proposed Cottam Solar Project (the Proposed Development). The Applicant notified the Secretary of State (SoS) under Regulation 8(1)(b) of those regulations that they propose to provide an Environmental Statement (ES) in respect of the Proposed Development and by virtue of Regulation 6(2)(a), the Proposed Development is 'EIA development'.
- 1.0.2 The Applicant provided the necessary information to inform a request under EIA Regulation 10(3) in the form of a Scoping Report, available from:  
<http://infrastructure.planninginspectorate.gov.uk/document/EN010133-000014>
- 1.0.3 This document is the Scoping Opinion (the Opinion) adopted by the Inspectorate on behalf of the SoS. This Opinion is made on the basis of the information provided in the Scoping Report, reflecting the Proposed Development as currently described by the Applicant. This Opinion should be read in conjunction with the Applicant's Scoping Report.
- 1.0.4 The Inspectorate has set out in the following sections of this Opinion where it has not agreed to scope out certain aspects/ matters on the basis of the information provided at as part of the Scoping Report.
- 1.0.5 Before adopting this Opinion, the Inspectorate has consulted the 'consultation bodies' listed in Appendix 1 in accordance with EIA Regulation 10(6). A list of those consultation bodies who replied within the statutory timeframe (along with copies of their comments) is provided in Appendix 2. These comments have been taken into account in the preparation of this Opinion.
- 1.0.6 The Inspectorate has published a series of advice notes on the National Infrastructure Planning website, including [Advice Note 7: Environmental Impact Assessment: Preliminary Environmental Information, Screening and Scoping \(AN7\)](#). AN7 and its annexes provide guidance on EIA processes during the pre-application stages and advice to support applicants in the preparation of their Environmental Statement (ES).
- 1.0.7 Applicants should have particular regard to the standing advice in AN7, alongside other advice notes on the Planning Act 2008 (PA2008) process, available from:  
<https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/>

## 2. OVERARCHING COMMENTS

### 2.1 Description of the Proposed Development

(Scoping Report Section 4)

ID	Ref	Description	Inspectorate's comments
2.1.1	4.1.3	NSIP definition	The Proposed Development application will comprise three array sites where solar panels will be installed. The Environmental Statement (ES) should ensure that the generic and specific mitigation requirements for each of the sites are clearly distinguished within the draft Development Consent Order (DCO).
2.1.2	4.2.14 to 4.2.15	Substation and energy storage	These are proposed to be located at each Cottam site although the exact location will be determined through the iterative design process. The ES should provide the location and extent of these areas and any potential impacts from these features should be assessed in the relevant Chapters.
2.1.3	1.1.4	Additional Land for mitigation	Scoping Report paragraph 1.1.4 states that " <i>additional land may be included in the DCO application for mitigation works, such as highway improvement works and ecological mitigation</i> ". The ES should identify any changes in the red line boundary of the Proposed Development and where additional land has been included. The Proposed mitigation should be described, and any associated impacts should be assessed in the ES where significant effects are likely to occur.
2.1.4	4.3.2 and 4.3.3	Construction phasing timeline and worst-case scenarios	Construction periods are set out in Scoping Report paragraphs 4.3.2 and 4.3.3 for various elements of the Proposed Development. It states that some of the 'larger' sites may have construction crews working at the same time. The ES should set out the construction programme for each of the three sites comprising the Proposed Development to ensure a clear understanding of construction vehicle



ID	Ref	Description	Inspectorate's comments
			assumptions and cumulative construction impacts to ensure that the worst-case construction scenarios are understood.
2.1.5	Section 3.3 and 4.3.5	Construction compounds	The number, location and maximum parameters of construction compounds should be identified in the ES. The ES should explain how the optioneering process for such development components has sought to avoid or minimise impacts on human and ecological receptors during construction and operation.
2.1.6	Section 4.2	Type of solar panels and set up – tracking or fixed and electrical output parameter	The ES should confirm the number, type and structural set up of panels required including their proposed foundations i.e. the location and quantity of piled foundations/concrete feet (including any ballast required) foundations and whether they are tracking or fixed and the aspect they face. This should include a description and reasoning of spacing between panels to avoid ground shading effects and any buffers employed. The ES should also describe and assess a worst-case scenario in the relevant aspect chapters in relation to the type of solar panels being constructed e.g. soil compaction, traffic and transport, landscape and visual impact.
2.1.7	Table 25.1	Discrepancies between text and tables relating to assessment scope	<p>Table 25.1 summarises aspects/impacts/receptors proposed to be scoped in/out of the ES. The information presented in Table 25.1 does not consistently align with what is written in the relevant aspect Chapter, for example, Table 25.1 proposes to scope out construction dust, but this is not proposed to be scoped out in Scoping Report Chapter 20. Table 25.1 proposes to scope out lighting from the landscape and visual Chapter but this is not proposed to be scoped out of Scoping Report Chapter 7.</p> <p>When writing this Scoping Opinion, the Inspectorate has therefore disregarded the information provided in Table 25.1 and based all comments on the main body of text set out in the aspect Chapters of the Scoping Report.</p>

ID	Ref	Description	Inspectorate's comments
2.1.8	4.3.11	Maintenance activities	Maintenance is referred to throughout the Scoping Report but the activities are not described. The ES should describe the potential scope and duration of maintenance works that would be required during the operation of the Proposed Development, including predicted vehicle movements and staffing numbers.
2.1.9	n/a	Font	The Planning Inspectorate's Advice Note 6 requests that application documents should adopt a clear font such as Arial or Verdana. The ES should format the main body of text in one of these fonts.

## 2.2 EIA Methodology and Scope of Assessment

(Scoping Report Section 2)

ID	Ref	Description	Inspectorate's comments
2.2.1	Chapter 2	Decommissioning of West Burton A	<p>Cumulative assessments in the Scoping Report do not refer to the decommissioning of West Burton A which is due to start in late 2022. This has potential to lead to significant effects as decommissioning activity could overlap with the construction of West Burton Solar Farm, which is due to commence construction in 2024 at the earliest.</p> <p>The ES should include West Burton A decommissioning in the cumulative assessment where there is potential for likely significant effects.</p>
2.2.2	20.1.1, 8.2.10 and Table 20.1	Cross referencing relevant Chapter assessments	<p>Scoping Report Chapter 20 Air Quality includes ecological receptors in paragraph 20.1.1 but excludes them from receptor criteria in Table 20.1. Air pollution is, however, included as a potential impact in Scoping Report Chapter 8 Ecology, paragraph 8.2.10 but no cross-reference has been made in either Chapter.</p> <p>For clarity, where assessments overlap, the ES should cross-reference where impacts/receptors are assessed.</p>
2.2.3	n/a	Transboundary effects	<p>The Scoping Report makes no reference to transboundary effects on the environment of any European Economic Area (EEA) state. Given the nature, scale and location of the Proposed Development, the Inspectorate does not consider that it has the potential for significant transboundary effects on the environment of any EEA State.</p> <p>The ES however should confirm whether the Proposed Development has potential to give rise to significant transboundary effects.</p>

ID	Ref	Description	Inspectorate's comments
2.2.4	4.3.10	Co-ordination with other solar farms	Scoping Report paragraph 4.3.10 states that if Cottam and West Burton solar farms proceed in parallel, they will plan and co-ordinate construction activities via the Construction Environmental Management Plan (CEMP) and Construction Traffic Management Plan (CTMP) to reduce impacts. Where possible, the Applicant should also make efforts to co-ordinate its activities with other solar projects coming forward in the local area.

### 3. ENVIRONMENTAL ASPECT COMMENTS

#### 3.1 Climate Change

(Scoping Report Section 6)

<b>ID</b>	<b>Ref</b>	<b>Applicant's proposed matters to scope out</b>	<b>Inspectorate's comments</b>
3.1.1	6.3.7 and Table 6.1	In-combination sea level rise impact of climate change and the Proposed Development	<p>Scoping Report Table 6.1 states that the Proposed Development is not located in an area susceptible to sea level rise. It is also noted that the Environment Agency has not raised any concerns in relation to in-combination sea level rise impacts.</p> <p>On this basis, the Inspectorate is content to scope this matter out.</p>

<b>ID</b>	<b>Ref</b>	<b>Description</b>	<b>Inspectorate's comments</b>
3.1.2	6.3.10	Cumulative effects	<p>Scoping Report paragraph 6.3.11 states that the assessment will consider how the surrounding area will be impacted by the Proposed Development cumulatively with other schemes. The ES should also consider how other developments cumulatively may affect the vulnerability of the Proposed Development to climate change e.g. any changes in flood flows, and cumulative GHG emissions/savings.</p>

## 3.2 Landscape and Visual

(Scoping Report Section 7)

<b>ID</b>	<b>Ref</b>	<b>Applicant's proposed matters to scope out</b>	<b>Inspectorate's comments</b>
3.2.1	n/a	n/a	No matters have been proposed to be scoped out of the assessment

<b>ID</b>	<b>Ref</b>	<b>Description</b>	<b>Inspectorate's comments</b>
3.2.2	Section 4.2	Type of panels	The Scoping Report states that a decision has not been taken in relation to whether stationary or tracking panels will be used. Where the potential panel solutions are widely different in their physical characteristics, the ES should give consideration to one, or more, worst-case scenarios for the impact of the panel types, as well as considering the maximum parameters of development.
3.2.3	7.1.7 to 7.1.8	5km Study area	The Inspectorate considers that a 5km study area is broadly appropriate, however in light of the extent of the Proposed Development and the nature of the surrounding terrain with some elevated viewpoints, the assessment should consider the potential for landscape and visual receptors to be affected that are close to but outside the 5km buffer area. The final extent of the study area and viewpoints should be determined in consultation with the relevant local authorities.

### 3.3 Ecology and Biodiversity

(Scoping Report Section 8)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.3.1	8.2.32 and Appendix 8, 4.11.2 and 4.11.15	Polecat	<p>Scoping Report Appendix 8, paragraph 4.11.2 identifies that one polecat record was found 1.2km south east of Coates South. Paragraph 4.11.15 identifies that all Cottam sites are conducive to the presence of polecat therefore impacts cannot be ruled out.</p> <p>On this basis, the Inspectorate does not agree to scope this matter out. The ES should assess impacts to polecats where significant effects are likely to occur.</p>
3.3.2	8.2.32, Table 8.1	Dormice	<p>Desk-based searches found no records of Dormice in the Lincoln to Gainsborough area in which the Proposed Development is located. Additionally, Scoping Report Appendix 8, paragraph 4.6.1 identified that habitats on site are considered poor for dormice and are unlikely to be linked to or support a population. The Inspectorate is content to scope out effects on dormice on this basis.</p>
3.3.3	Table 8.1 and 8.2.51	Fish	<p>Scoping Report paragraph 8.2.51 states that the main potential source of impacts to fish is from pollution events during construction which would be managed through standard avoidance measures secured in the Construction Environment Management Plan (CEMP). The cable route will need to cross rivers but this will be done by using horizontal directional drilling (HDD) methods and buffer zones to avoid direct harm on these watercourses. Night-time working may be proposed for cable route installation and HDD (paragraph 4.3.6).</p> <p>Impacts from vibration, noise and lighting during construction have not been considered. As the red line boundary of the solar array at Cottam one is adjacent to the River Till at multiple locations and</p>

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
			<p>sometimes, on both banks, there is potential for disturbance impacts on fish from activities such as piling for the foundations of the panels and from construction task lighting. Scoping Report paragraph 8.2.51 states that horizontal directional drilling is also proposed for cable crossing of rivers; this has potential to cause impacts on aquatic species due to breakout from drilling fluids and vibration within the riverbed.</p> <p>In the absence of information relating to the potential for impacts from noise, vibration, lighting or sediment breakout from the Proposed Development on fish species the Inspectorate does not agree to scope this matter out.</p> <p>The ES should include a description of the sensitivity of relevant watercourses and any seasonal constraints on such crossings, assessing likely significant effects on riverine species where they are likely to occur from noise, vibration and lighting disturbances.</p>

ID	Ref	Description	Inspectorate's comments
3.3.4	4.4.5, 8.2.40 and 8.3.8 to 8.3.14 and 8.4.35	Skylark, yellow wagtail and lapwing mitigation	<p>Following preliminary surveys, skylark, yellow wagtail and lapwing are identified in the Scoping Report as a ground-nesting bird species likely to be impacted by the Proposed Development as they were recorded across all land parcels for the Proposed Development during surveys.</p> <p>Scoping Report paragraph 8.4.35 states that options for the provision of compensatory measures will be explored and paragraph 4.4.5 states that mitigation land will be provided for Skylarks. The location and area of this mitigation land has not been defined at this stage. It is unclear if this mitigation land is also proposed as mitigation for yellow wagtail and lapwing.</p>



ID	Ref	Description	Inspectorate's comments
			<p>The ES should explain the location of such areas and how compensation areas will be secured, delivered and managed/ maintained to be effective. Species already using the proposed mitigation sites should be identified and any impacts e.g. displacement should be assessed where significant effects are likely to occur.</p>
3.3.5	8.2.42	Bird species breeding in field boundaries	<p>Scoping Report paragraph 8.2.42 states that species breeding in field boundaries are considered less likely to be impacted by the proposals beyond removal of field boundary habitats and that hedgerow removal is anticipated.</p> <p>The ES should assess disturbance impacts to bird species breeding in field boundaries e.g. piling during construction, explain how existing hedgerows within the site will be retained and outline the measures to be taken to mitigate disturbance impacts and the removal of existing field boundary habitats.</p>
3.3.6	8.2.10	Lighting disturbance	<p>Scoping Report paragraph 8.2.10 lists potential impacts during construction but disturbance does not include lighting disturbance. Scoping Report paragraph 4.3.5 identifies that lighting will be required during construction.</p> <p>The ES should assess impacts on ecological receptors from lighting where significant effects are likely to occur and demonstrate measures taken to avoid disruption of ecological corridors such hedgerows that provide flight-lines for bats.</p>
3.3.7	8.2.12	20km study area for designated sites with bats as features	<p>Scoping Report paragraph 8.2.12 states that a 20km search area will be used as a study area to search for designated sites with bats and birds as features. A 30km radius of search should be applied in line with standard practice.</p>

ID	Ref	Description	Inspectorate's comments
3.3.8	8.2.6	Badger surveys	<p>Scoping Report paragraph 8.2.6 sets out the surveys proposed to be carried out to inform the ES baseline. This does not include badger surveys although they are present at Cottam 1 and 3 sites (paragraph 8.2.25).</p> <p>Badger surveys should be carried out to inform the ecological baseline and impacts should be assessed where significant effects are likely to occur.</p>
3.3.9	n/a	Confidential annexes	<p>Public bodies have a responsibility to avoid releasing environmental information that could bring about harm to sensitive or vulnerable ecological features. Specific survey and assessment data relating to the presence and locations of species such as badgers, rare birds and plants that could be subject to disturbance, damage, persecution or commercial exploitation resulting from publication of the information, should be provided in the ES as a confidential annex. All other assessment information should be included in an ES chapter, as normal, with a placeholder explaining that a confidential annex has been submitted to the Inspectorate and may be made available subject to request.</p>

### 3.4 Hydrology, Flood Risk and Drainage

(Scoping Report Section 9)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.4.1	n/a	n/a	n/a

ID	Ref	Description	Inspectorate's comments
3.4.2	9.3.2 and Appendix 9	Hydrological receptors	<p>Scoping Report paragraphs 9.3.2 and 9.3.3 state that a hydrological assessment will be undertaken to establish local catchments and overland flow routes and significance will be informed by the valuation of watercourses. No reference is made to other water features e.g. ponds although they are located within the Cottam one and three sites (Scoping Report paragraph 8.2.21 and 8.2.37). These are not identified in Appendix 9 which only establishes the flood risk baseline, and location of, watercourses.</p> <p>The ES assessment should identify and locate all water resources, including ponds, ditches, groundwater resources, wetlands etc. that are hydrologically linked to, and may be impacted by, the Proposed Development site, including the cable route and siting of the storage/substation components. If this is assessed in other Chapters, the ES should cross-reference accordingly.</p>
3.4.3	9.3.2 and Appendix 9	Climate change projections	<p>Scoping Report paragraph 9.3.2 states that hydrological analysis will consider climate change but provides no further detail on how this will be considered in the ES assessment, specifically on what projections will be applied and why.</p>

ID	Ref	Description	Inspectorate's comments
			For clarity, relevant, up to date, climate change allowances as set out in the Planning Practice Guidance for flood risk and coastal change should be applied.
3.4.4	9.3.13	Maintaining existing drainage patterns	Scoping Report paragraph 9.3.13 states that rainwater will be 'shed' to the ground as per the existing situation however, it is not explained whether the concentration of runoff from solar panel faces will impact on existing drainage patterns. The ES, Flood Risk Assessment and Drainage Strategy should explain whether the presence of solar panels will affect runoff rates and distribution, describing any significant effects that may arise.

### 3.5 Ground Conditions and Contamination

(Scoping Report Section 10)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.5.1	10.5.1	Cottam one to three sites	<p>Scoping Report paragraph 10.5.1 proposes to scope out ground conditions and contamination impacts from Cottam one to three sites from the ES on the basis that the potential for impacts is low and mitigation measures will reduce potential impacts to negligible.</p> <p>Appendix 10 provides a Preliminary Risk Assessment (PRA) for Cottam sites one to three. This sets out potential sources of contamination and contamination pathways; only limited contamination sources and pathways have been identified at each site and mitigation measures are described and committed to in Scoping Report paragraphs 10.4.7 to 10.4.12.</p> <p>It is noted that at Cottam one and two, ground gas sources have been identified and it is recommended that a further limited investigation should be carried out once the site layout design is complete.</p> <p>The Inspectorate is content to scope out ground conditions and contamination at the Cottam three site, on the basis of the PRA information. In light of the identified ground gas source at Cottam one and two sites, the ES should include an assessment of impacts arising from ground gas sources where significant effects are likely to occur and describe and secure any associated mitigation. The approach to ground gas emissions assessment should be agreed with the local planning authority, where possible.</p>

<b>ID</b>	<b>Ref</b>	<b>Description</b>	<b>Inspectorate's comments</b>
3.5.2	n/a	n/a	n/a

### 3.6 Minerals

(Scoping Report Section 11)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.6.1	11.3.1	Cottam Sites one, two and three	<p>The Scoping Report states that approximately 50 hectares of Cottam one is identified in the Lincolnshire Minerals and Waste Local Plan as being within two sand and gravel mineral safeguarding areas and that 25 hectares of Cottam two lies within a sand and gravel mineral safeguarding area.</p> <p>The Scoping Report also identifies a small area of Cottam three which also lies within a sand and gravel mineral safeguarding area. The Scoping Report identifies that this area forms part of the 46 hectares of the site that lies within an identified area of search (sand and gravel) in the Lincolnshire Minerals and Waste Local Plan.</p> <p>Paragraph 5.9 of Appendix 11.1 confirms that "<i>the proposed development does not require deep excavations or foundations and thus disturbance is limited to the surface layers rather than underlying deposits</i>".</p> <p>The ES should demonstrate that the Minerals Planning Authority has been consulted in respect of the proposals and that the Proposed Development does not impact on future ambitions for minerals extraction within the region.</p>

ID	Ref	Description	Inspectorate's comments
3.6.2	Chapter 11 and Appendix 11	Location of mineral safeguarding areas	Scoping Report Appendix 11 does not provide any figures identifying the location and extent of mineral safeguarding areas or the identified area of search. The Scoping Report confirms that the whole site is covered by a Petroleum Exploration and Development License (PEDL)

ID	Ref	Description	Inspectorate's comments
			<p>as shale gas is located beneath the sites; this is currently prohibited to be extracted in the UK (Scoping Report Appendix 11).</p> <p>Two oil extraction sites are located 1km and 6km from Cottam one and three respectively although none of the Cottam array sites fall within the mineral consultation zones for these sites. It is unclear whether the cable routes do or not.</p> <p>The ES should include a figure identifying the location and extent of the PEDL and any mineral safeguarding within the zone of influence of the Proposed Development. An assessment of impacts from the Proposed Development on extraction activities should be provided where significant effects are likely to occur.</p>



### 3.7 Archaeology

(Scoping Report Section 12)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.7.1	12.4.2, 12.3.1 and 12.3.14	Direct impacts upon designated heritage assets within the Cottam one, two and three sites	<p>Scoping Report paragraphs 12.3.14 and 12.3.1 explain that the Proposed Development will avoid any direct impacts to designated heritage assets within the Cottam sites through design and mitigation including the use of concrete feet instead of piling foundations.</p> <p>Lincolnshire County Council have identified that there remains potential for below ground archaeology associated with scheduled monuments which have not been identified in the geophysical survey and that ploughing and previous drainage activity does not preclude further/initial disturbance of archaeology that should be informed by trial trenching.</p> <p>On this basis, the Inspectorate considers that the potential for direct impacts on heritage assets should be considered. The extent of trial trenching activity should be agreed as part of a Written Scheme of Investigation with Lincolnshire County Council, where possible.</p>
3.7.2	12.4.2	Operational impacts	<p>Scoping Report paragraph 12.4.1 proposes to scope in indirect impacts from changes to drainage from the Proposed Development. Paragraph 12.4.2 proposes to scope out operational impacts, however, solar panels and potential concrete foundations can concentrate drainage patterns and therefore, changes in drainage can be considered an operational impact.</p> <p>For clarity, on the basis that impacts from changes in drainage are scoped into the assessment for both the operation and construction phases, other operational impacts on buried archaeology can be scoped out.</p>

ID	Ref	Description	Inspectorate's comments
3.7.3	12.2.13 to 12.2.43, 12.2.15 and Appendix 12	Geophysical surveys and baseline information for cable route	The baseline information presented in Appendix 12 and Scoping Report paragraphs 12.2.13 to 12.2.43 does not include the baseline information for the cable search area. Scoping Report paragraph 12.2.15 does not propose geophysical surveys for the cable route. Whilst the Inspectorate acknowledges that the cable route search areas are not finalised, geophysical surveys should be used to inform the design evolution of route corridors, where possible.

### 3.8 Built Heritage

(Scoping Report Section 13)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.8.1	13.5.3	Operational impacts	<p>Scoping Report paragraph 13.5.3 states that there will be no operational impacts from the Proposed Development on heritage assets however, there are a number of assets located within a visual line of the site as identified in Scoping Report section 13.3. Once operational, there is potential for the presence of the Proposed Development to impact the setting of heritage assets.</p> <p>On this basis, the Inspectorate does not agree to scope this matter out.</p>
3.8.2	13.5.4, Tables 13.1 to 13.6 and Appendix 13	84 Designated heritage assets	<p>Tables 13.1 to 13.6 and Appendix 13 identify assets within the study area but state that there would be no direct or indirect impact on 84 receptors but no evidence is provided to support this.</p> <p>The Inspectorate is not content to scope these receptors out on the basis of the evidence presented. The ES should provide evidence to demonstrate that there would be no direct or indirect impacts to these receptors. Where possible, the evidence base should be agreed with the local planning authority.</p>
3.8.3	12.3.14 and 13.5.5	Direct impacts to designated assets	<p>On the basis that the potential for impacts on designated assets (i.e. scheduled monuments) has been identified within the archaeology chapter of the Scoping Report and the potential need for further assessment, the Inspectorate considers that it has insufficient evidence to scope out consideration of direct impacts to designated heritage assets within the Cottam sites at this time. Impacts on designated assets should be assessed unless the potential for effects can be ruled out through relevant surveys.</p>

ID	Ref	Description	Inspectorate's comments
3.8.4	7.4.32, 7.1.8 and 13.3.3	Study area	<p>Scoping Report paragraph 7.1.8 defines the landscape and visual assessment study area as 5km due to the elevated nature of the landscape to the East of the site and there is a visual line from the ridge across the Cottam sites. Scoping Report paragraph 13.3.3 defines the Heritage study area as up to 2km which is inconsistent with that defined for the landscape and visual chapter although the setting of a heritage asset is influenced by the environment within the line of site (Annex 2 of the National Planning Policy Framework).</p> <p>Scoping Report paragraphs 13.4.30 to 13.4.32 state that no cumulative or in-combination effects from the construction and operation of the Proposed Development are anticipated on heritage assets.</p> <p>Appendix 7, Figure 7.6 identifies a number of heritage assets along the ridge from which there are lines of sight to both Cottam and West Burton therefore there are potential for cumulative effects on heritage assets.</p> <p>The ES should define an appropriate study area based on the extent of views to and from the Proposed Development and potential impacts to all heritage assets. This should inform the cumulative assessment.</p>
3.8.5	Table 13.9	Errors confusing methodology and identification of impacts on receptors	<p>Scoping Report Table 13.9 provides the matrix for defining significant effects however, it contains errors which undermine the methodology e.g. the first and second columns are duplicated in the third and fourth columns rather than demonstrating a reducing scale as per usual significance matrices. The ES should ensure the methodology for determining significant effects is clearly set out.</p>

### 3.9 Transport and Access

(Scoping Report Section 14)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
39.1	14.9.3 and 14.4.2	Effects during operational phase	<p>The Applicant proposes to scope out effects during the operational phase as "<i>there are anticipated to be only a handful of visits to the site per month by vehicle for maintenance</i>". The number of movements required either for each solar array site or the Proposed Development as a whole are not quantified.</p> <p>Scoping Report paragraph 14.4.2 states that further detail to support this will be provided in the ES. The Inspectorate agrees to scope this matter out subject to confirmation that the frequency and type of maintenance visits and vehicles, with reference to relevant thresholds (e.g. as set out in the Guidelines for Environmental Assessment of Road Traffic, 1993) would not give rise to a significant effect, taking account of any potential cumulative traffic effects.</p>

ID	Ref	Description	Inspectorate's comments
39.2	14.3.10	Traffic associated with construction workforce	<p>The Scoping Report states that "<i>the majority of the non-local workforce will stay at local accommodation and be transported to the site by minibuses to minimise the impact on the strategic and local highway network</i>". No indication is given of the expected total workforce during construction, consequently it is unclear what the impact of the traffic movements associated with the local workforce will be.</p> <p>The ES should quantify the number of construction workers and vehicle movements required and explain, with reference to relevant thresholds, whether this is likely to result in significant traffic effects</p>

ID	Ref	Description	Inspectorate's comments
3.9.3	Chapter 14, 21.3.1 and Tables 21.3 and 21.4	Public Rights of Way (PRoW) surveys	<p>The Proposed Development site will affect a number of PRoW but no surveys are proposed to understand the baseline use of these PROWs.</p> <p>Surveys should be undertaken to provide baseline data in relation to the use of the PROWs affected by the site, where appropriate, to define the change in characteristics of tourism and recreational use of PRoW as is required to define receptor sensitivity in Table 21.3 and the magnitude of change in Table 21.4.</p>
3.9.4	14.9.4 to 14.9.5	Effects during the decommissioning phase	<p>The Inspectorate would expect to see a Decommissioning Plan, agreed with the Local Authority, secured through the inclusion of an Outline Decommissioning Plan or similar with the Application. The ES should clearly set out if and how decommissioning is to be assessed and any components which may remain following decommissioning.</p>
3.9.5	Figures 14.1 and 14.2	Weight limits	<p>Scoping Report Figures 14.1 and 14.2 demonstrate that accesses to Cottam one are mostly off rural roads e.g. Stow Lane; many of which are subject to weight restrictions. The ES should take account of such restrictions in the baseline description and choice of construction traffic routes, assessing any significant impacts where relevant.</p>

### 3.10 Noise and Vibration

(Scoping Report Section 15)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.10.1	14.3.10 and Table 14.2, 15.4.4 and 15.4.5	Road traffic noise	<p>The Applicant proposes to scope out road traffic noise on the basis that <i>"the scheme is not expected to result in increases in off-site road traffic volumes of greater than 100%"</i> where an increase in 100% would result in a significant adverse effect of 3dB noise.</p> <p>Scoping Report paragraph 14.3.10 states that construction traffic will be dominated by HGVs. Table 14.2 indicates that increases in construction traffic will not exceed 100%. Traffic noise levels are influenced by the volume of traffic, percentage of HGVs and distance from the source. A 3dB threshold is based on steady state conditions and HGVs can change the character of noise which can result in the nuisance being far greater than the predicted steady state conditions.</p> <p>Therefore, although the scheme is not expected to result in traffic increases greater than 100%, as traffic will be predominantly HGVs, this does not necessarily demonstrate no likely significant effects.</p> <p>Therefore, the Inspectorate does not agree to scope this matter out and the ES should assess noise impacts from construction traffic where significant effects are likely to occur; the noise assessment should characterise noise impacts based on the volume of traffic, percentage of HGVs and distance from the source using a recognised methodology such as BS5228.</p>
3.10.2	15.4.6	Vibration effects during operation	<p>Scoping Report paragraph 15.4.6 states that there would be no significant sources of vibration during operation.</p> <p>Considering the nature of the Proposed Development during operation, the Inspectorate is content to scope this matter out. The</p>

<b>ID</b>	<b>Ref</b>	<b>Applicant's proposed matters to scope out</b>	<b>Inspectorate's comments</b>
			ES should describe the potential sources of vibration arising from the operation of e.g. substation and battery storage infrastructure and any measures to control emissions.
3.10.3	15.4.7	Vibration effects during construction	<p>Scoping Report paragraph 15.4.7 identifies piling as the only source of vibration impacts during construction. Sensitive receptors would not be located within 14m beyond which, cosmetic damage to properties is unlikely to occur. Effects on human receptors have not been considered and there is no commitment to ensure vibration levels remain below guidance threshold criteria.</p> <p>On this basis, the Inspectorate does not agree to scope out this matter and the ES should include an assessment of significant effects from vibration on human receptors, in line with relevant British Standards, where they are likely to occur.</p>

<b>ID</b>	<b>Ref</b>	<b>Description</b>	<b>Inspectorate's comments</b>
3.10.4	n/a	Tracking panels	Scoping Report section 4.2 identifies that the type of panel to be used is not yet determined and tracking panels may be used. Should this type of panel be used, the ES should assess the potential for significant noise effects on ecological and human receptors during operation.



### 3.11 Glint and Glare

(Scoping Report Section 16)

<b>ID</b>	<b>Ref</b>	<b>Applicant's proposed matters to scope out</b>	<b>Inspectorate's comments</b>
3.11.1	n/a	n/a	No matters have been proposed to be scoped out of the assessment

<b>ID</b>	<b>Ref</b>	<b>Description</b>	<b>Inspectorate's comments</b>
3.11.2	16.1.1	Impacts on navigation	<p>Sensitive receptors for glint and glare impacts are listed in Scoping Report paragraph 16.1.1. This does not include river users. The Cottam one site is located adjacent/near navigable waterways and therefore there remains potential for glint and glare to impact on users of the navigation.</p> <p>The ES should assess glint and glare impacts to river users where significant effects are likely to occur.</p>

### 3.13 Electromagnetic Fields

(Scoping Report Section 17)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.13.1	17.1.14 and Appendix 17	Electromagnetic fields (EMF)	<p>Scoping Report paragraph 17.3.14 states that, as demonstrated in Appendix 17, the cable route will be &lt;132kV and therefore is predicted to be below 1998 International Commission on the Non-Ionising Radiation Protection (ICNIRP) reference levels where, if exceeded, further investigation into impacts to human health is warranted.</p> <p>Scoping Report paragraph 17.1.4 explains that a 400kV powerline will be underground and used to connect the cable to the grid at the substation location. Scoping Report paragraph 17.3.14 states that all residential dwellings will be more than 400m from the Proposed Development's substations and that levels of the electromagnetic radiation are all predicted to be below ICNIRP reference levels.</p> <p>It is noted that the 400kV substation location has not yet been identified at Cottam one. The ES should explain how the siting of the substation has been chosen to avoid adverse impacts on human and ecological receptors.</p> <p>On this basis and subject to the provision of technical reporting to demonstrate that relevant design standards have been met for all cabling the Inspectorate is content to scope out consideration of EMF.</p>

ID	Ref	Description	Inspectorate's comments
3.13.2	n/a	n/a	n/a

### 3.14 Light Pollution

(Scoping Report Section 18)

<b>ID</b>	<b>Ref</b>	<b>Applicant's proposed matter to scope out</b>	<b>Inspectorate's comments</b>
3.14.1	Section 18.4 and 7.4.31	Separate chapter	<p>Impacts of lighting on ecological receptors are proposed to be included in the Landscape and Visual and Ecology assessment Chapters of the ES respectively rather than being assessed in a separate Chapter.</p> <p>The Inspectorate is content with this approach. The ES should include a detailed description of the lighting philosophy and the measures taken to avoid or minimise lighting impacts on human and ecological receptors.</p>

<b>ID</b>	<b>Ref</b>	<b>Description</b>	<b>Inspectorate's comments</b>
3.14.2	n/a	n/a	n/a

### 3.16 Major Accidents and Disasters

(Scoping Report Section 19)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.16.1	Sections 19.2 and 19.3	Separate Chapter	<p>Scoping Report paragraph 19.2.1 sets out a list of potential impacts from major accidents and disasters to/from the Proposed Development and where these will be assessed in other Chapters in the ES. Impacts include:</p> <ul style="list-style-type: none"> <li>• Flooding;</li> <li>• Fires and explosion;</li> <li>• Road Accidents;</li> <li>• Hazardous substances;</li> <li>• Rail Accidents;</li> <li>• Aviation accidents;</li> <li>• Damage or cut-off of utilities;</li> <li>• Disturbance of Unexploded Ordnance;</li> <li>• Unstable ground conditions; and</li> <li>• Vegetation pests and diseases.</li> </ul> <p>The above impacts are proposed to be assessed in other chapters such as Human Health (Scoping Report paragraph 19.3.1), however, Human Health is also proposed to be assessed in other chapters, rather than a stand-alone chapter.</p> <p>The ES should not be a 'paperchase' and should clearly signpost where these impacts are assessed in other relevant chapters and where any relevant mitigation measures are secured.</p>

<b>ID</b>	<b>Ref</b>	<b>Description</b>	<b>Inspectorate's comments</b>
3.16.2	n/a	n/a	n/a

### 3.18 Air Quality

(Scoping Report Section 20)

<b>ID</b>	<b>Ref</b>	<b>Applicant's proposed matters to scope out</b>	<b>Inspectorate's comments</b>
3.18.1	20.5.1 to 20.5.3 and 20.3.10	Detailed modelling and assessment of construction effects of the development.	<p>The Scoping Report seeks to scope out detailed air quality modelling and assessment of effects from construction, although a qualitative dust assessment and a CEMP taking account of Institute of Air Quality Management (IAQM) guidance are proposed.</p> <p>Subject to confirmation that the proposed construction vehicle numbers alone or cumulatively with other proposals on relevant links (e.g. for Cottam Solar Project) will not exceed the relevant IAQM-EPUK thresholds e.g. 100 HGV AADT, the Inspectorate considers that the need for detailed construction air quality modelling and assessment can be scoped out.</p>
3.18.2	20.5.4 and 14.4.1	Detailed modelling and assessment of impacts associated with road traffic emissions arising from operational traffic.	Based on the nature of the development and subject to confirmation of the type and number of maintenance vehicles, the Inspectorate considers that operational traffic movements will be limited and that operational traffic air quality modelling may be scoped out.

<b>ID</b>	<b>Ref</b>	<b>Description</b>	<b>Inspectorate's comments</b>
3.18.3	n/a	n/a	n/a

### 3.20 Socio-Economics, Tourism and Recreation and Human Health

(Scoping Report Section 21)

ID	Ref	Applicant's proposed matters to scope out	Inspectorate's comments
3.20.1	21.2.7	Human health	<p>Human Health is scoped out of this Chapter as the assessment of impacts to human health are proposed to be incorporated into the following aspect Chapters in the ES:</p> <ul style="list-style-type: none"> <li>• 9: Hydrology, Flood Risk and Drainage</li> <li>• 10: Ground Conditions and Contamination</li> <li>• 14: Transport and Access</li> <li>• 15: Noise and Vibration</li> <li>• 16: Glint and Glare</li> <li>• 17: Electromagnetic Fields</li> <li>• 18: Light Pollution</li> <li>• 19: Major Accidents and Disasters</li> <li>• 20: Air Quality</li> <li>• 22: Agricultural Circumstances</li> <li>• 23: Waste</li> <li>• 24: Telecommunications, Utilities and Television Receptors</li> </ul> <p>It is noted that some of the Chapters referenced above are scoped out or proposed to be assessed in other relevant Chapters.</p> <p>The Inspectorate is content with this approach on the basis that the ES clearly signposts in which other Chapters impacts to human health are assessed.</p>

<b>ID</b>	<b>Ref</b>	<b>Description</b>	<b>Inspectorate's comments</b>
3.20.2	21.3.1	Census data	New census data is set to be published in spring 2022. This should be used to inform baseline data and the ES assessment.
3.20.3	21.3.14 to 21.3.15 and Table 21.5	Significance	The Scoping Report explains that significance is assessed based on comparison of receptor sensitivity and impact magnitude criteria in Table 21.5 but does not explain what constitutes a significant effect. The ES should confirm the threshold for determination of a significant effect in relation to impacts on Human Health, Socio-economics and Tourism.

<b>ID</b>	<b>Ref</b>	<b>Description</b>	<b>Inspectorate's comments</b>
3.20.4	n/a	n/a	n/a



### 3.21 Agricultural Circumstances

(Scoping Report Section 22)

<b>ID</b>	<b>Ref</b>	<b>Applicant's proposed matters to scope out</b>	<b>Inspectorate's comments</b>
3.21.1	Section 22.4 and paragraph 21.2.3	Separate chapter	<p>Scoping Report paragraph 22.4.1 proposes to assess impacts to agricultural land resources, soil resources and farming circumstances in the socio-economics, tourism and recreation and human health Chapter of the ES.</p> <p>The Inspectorate is content with this approach although the ES should signpost where effects to these receptors have been incorporated into the relevant Chapter assessments. Where impacts to soils and agricultural land is assessed in other relevant Chapters, this should include determining the degree and extent to which soils have been disturbed or damaged and any relevant mitigation measures employed to avoid/reduce impacts to soils; these should be secured via the DCO.</p>

<b>ID</b>	<b>Ref</b>	<b>Description</b>	<b>Inspectorate's comments</b>
3.21.2	n/a	n/a	n/a

### 3.23 Waste

(Scoping Report Section 23)

ID	Ref	Applicant's proposed aspect to scope out	Inspectorate's comments
3.23.1	Section 23.4	Whole aspect	<p>Scoping Report paragraphs 23.3.1 to 23.4.1 propose to scope out impacts from waste on the basis that the following information will be provided:</p> <ul style="list-style-type: none"> <li>• a Site Waste Management Plan detailing how waste will be managed in line with relevant legislation;</li> <li>• Appropriate mitigation measures to minimise waste in line with the waste heirarchy will be secured via the CEMP;</li> <li>• A description of construction waste streams and estimated volumes;</li> <li>• A description of the likely impact of componant replacement and implications on waste arisings/recycling; and</li> <li>• An assumption that 'almost' all of the solar panels will be recycled at decommissioning in line with best practice guidance at the time of decommissioning.</li> </ul> <p>There is no commitment to recycle solar panels at decommissioning and no evidence to support the viability and/or methodology of recycling.</p> <p>Scoping Report paragraph 23.3.2 also states that '<i>any likely significant effects identified by the CEMP, including cumulative impacts, will be assessed as part of the ES in the relevant chapter</i>'. For clarity, the ES should be the means for identifying likely significant effects and the CEMP should provide the means to mitigate such effect. Any potential likely significant effects should be assessed</p>

ID	Ref	Applicant's proposed aspect to scope out	Inspectorate's comments
			<p>through an appropriate methodology set out in a separate aspect Chapter in the ES.</p> <p>Based on the above information, the Inspectorate does not agree to scope waste out as the potential remains for significant effects to occur both from the Proposed Development alone and cumulatively with other developments during construction and decommissioning. The ES should include an assessment of waste impacts where significant effects are likely to occur and include and outline what measures, if any, are in place to ensure that panels and any associated components are able to be diverted from the waste chain.</p>

ID	Ref	Description	Inspectorate's comments
3.23.2	n/a	n/a	n/a

### 3.24 Telecommunications, Utilities and Television Receptors

(Scoping Report Section 24)

<b>ID</b>	<b>Ref</b>	<b>Applicant's proposed aspect to scope out</b>	<b>Inspectorate's comments</b>
3.24.1	Section 24.3	Whole aspect	<p>Scoping Report paragraph 24.1 states that the location and safeguarding areas relating to utilities, telecommunications and television assets will be identified and consultation will inform how the proposal will embed mitigation to avoid any direct impacts on these assets.</p> <p>No indirect impacts are anticipated due to the nature of the Proposed Development.</p> <p>Subject to the inclusion of measures to avoid direct impacts on utilities, telecommunications and television assets in the ES, the Inspectorate is content to scope this matter out from further assessment.</p>

<b>ID</b>	<b>Ref</b>	<b>Description</b>	<b>Inspectorate's comments</b>
3.24.2	n/a	n/a	n/a

## APPENDIX 1: CONSULTATION BODIES FORMALLY CONSULTED

**TABLE A1: PRESCRIBED CONSULTATION BODIES<sup>1</sup>**

<b>SCHEDULE 1 DESCRIPTION</b>	<b>ORGANISATION</b>
The Health and Safety Executive	Health and Safety Executive
The National Health Service Commissioning Board	NHS England
The relevant Clinical Commissioning Group	NHS Lincolnshire Clinical Commissioning Group
	NHS Bassetlaw Clinical Commissioning Group
Natural England	Natural England
The Historic Buildings and Monuments Commission for England	Historic England
The relevant fire and rescue authority	Lincolnshire Fire and Rescue Service
	Nottinghamshire Fire and Rescue Service
The relevant police and crime commissioner	Lincolnshire Police and Crime Commissioner
	Nottinghamshire Police and Crime Commissioner
The relevant parish council(s)	Sturton By Stow Parish Council
	Stow Parish Council
	Cammeringham Parish Council
	Blyton Parish Council
	Corringham Parish Council
	Laughton Parish Council
	Fillingham Parish Council

<sup>1</sup> Schedule 1 of The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (the 'APFP Regulations')

SCHEDULE 1 DESCRIPTION	ORGANISATION
	Glentworth Parish Council
	Harpwell and Hemswell Parish Council
	Torksey Parish Council
	Brampton Parish Council
	Marton Parish Council
	Gate Burton Parish Council
	Knaith Parish Council
	Willingham Parish Council
	Kexby Parish Council
	Brattleby Parish Council
	Ingham Parish Council
	Upton Parish Council
	Heapham Parish Council
	Springthorpe Parish Council
	Pilham Parish Council
	Northorpe Parish Council
	Treswell Parish Council
	South Leverton Parish Council
	North Leverton with Habbleshthorpe Parish Council
	Sturton Le Steeple Parish Council
	Rampton and Woodbeck Parish Council
	Cottam Parish Council
The Environment Agency	The Environment Agency (Lincolnshire and Northamptonshire)
The Marine Management Organisation	Marine Management Organisation (MMO)

<b>SCHEDULE 1 DESCRIPTION</b>	<b>ORGANISATION</b>
The Civil Aviation Authority	Civil Aviation Authority
The Relevant Highways Authority	Nottinghamshire County Council
	Lincolnshire County Council
The relevant strategic highways company	Highways England - Midlands
The Coal Authority	The Coal Authority
The relevant internal drainage board	Upper Witham Internal Drainage Board
	Trent Valley Internal Drainage Board
	Isle of Axholme and North Nottinghamshire Water Level Management Board
	Scunthorpe and Gainsborough Water Management Board
	Witham Third Internal Drainage Board
	Doncaster East Internal Drainage Board
	Ancholme Internal Drainage Board
The Canal and River Trust	The Canal and River Trust
Public Health England, an executive agency of the Department of Health	UK Health Security Agency
The Crown Estate Commissioners	The Crown Estate
The Forestry Commission	East and East Midlands
The Secretary of State for Defence	Ministry of Defence

**TABLE A2: RELEVANT STATUTORY UNDERTAKERS<sup>2</sup>**

<sup>2</sup> 'Statutory Undertaker' is defined in the APFP Regulations as having the same meaning as in Section 127 of the Planning Act 2008 (PA2008)

STATUTORY UNDERTAKER	ORGANISATION
The relevant Clinical Commissioning Group	NHS Lincolnshire Clinical Commissioning Group
	NHS Bassetlaw Clinical Commissioning Group
The National Health Service Commissioning Board	NHS England
The relevant NHS Trust	Lincolnshire Community Health Services NHS Trust
	East Midlands Ambulance Service NHS Trust
Railways	Network Rail Infrastructure Ltd
	Highways England Historical Railways Estate
Canal or Inland Navigation Authorities	The Canal and River Trust
Civil Aviation Authority	Civil Aviation Authority
Licence Holder (Chapter 1 Of Part 1 Of Transport Act 2000)	NATS En-Route Safeguarding
Universal Service Provider	Royal Mail Group
The relevant Environment Agency	The Environment Agency (Lincolnshire and Northamptonshire)
The relevant water and sewage undertaker	Anglian Water
	Severn Trent
The relevant public gas transporter	Cadent Gas Limited
	Last Mile Gas Ltd
	Energy Assets Pipelines Limited
	ES Pipelines Ltd
	ESP Networks Ltd
	ESP Pipelines Ltd
	ESP Connections Ltd



STATUTORY UNDERTAKER	ORGANISATION
	Fulcrum Pipelines Limited
	Harlaxton Gas Networks Limited
	GTC Pipelines Limited
	Independent Pipelines Limited
	Indigo Pipelines Limited
	Leep Gas Networks Limited
	Murphy Gas Networks limited
	Quadrant Pipelines Limited
	Squire Energy Limited
	National Grid Gas Plc
	Scotland Gas Networks Plc
	Southern Gas Networks Plc
The relevant electricity generator with CPO Powers	Uniper - Cottam Development Centre
	Uniper - Cottam Power Station
	EDF - West Burton Power Station
The relevant electricity distributor with CPO Powers	Eclipse Power Network Limited
	Energy Assets Networks Limited
	ESP Electricity Limited
	Forbury Assets Limited
	Fulcrum Electricity Assets Limited
	Harlaxton Energy Networks Limited
	Independent Power Networks Limited
	Indigo Power Limited
	Last Mile Electricity Ltd
	Leep Electricity Networks Limited

STATUTORY UNDERTAKER	ORGANISATION
	Murphy Power Distribution Limited
	The Electricity Network Company Limited
	UK Power Distribution Limited
	Utility Assets Limited
	Vattenfall Networks Limited
	Northern Powergrid (Yorkshire) plc
	Western Power Distribution (East Midlands) plc
The relevant electricity transmitter with CPO Powers	National Grid Electricity Transmission Plc
	National Grid Electricity System Operator Limited

**TABLE A3: SECTION 43 LOCAL AUTHORITIES (FOR THE PURPOSES OF SECTION 42(1)(B))<sup>3</sup>**

LOCAL AUTHORITY <sup>4</sup>
West Lindsey District
North Kesteven District
City of Lincoln Council (B)
Bassetlaw District
Newark and Sherwood District
Mansfield District
Bolsover District
East Lindsey District
North East Lincolnshire

<sup>3</sup> Sections 43 and 42(B) of the PA2008

<sup>4</sup> As defined in Section 43(3) of the PA2008

<b>LOCAL AUTHORITY<sup>4</sup></b>
North Lincolnshire
Rotherham Metropolitan Borough Council
Doncaster Metropolitan Borough Council
North East Lincolnshire
North Lincolnshire
Rutland County Council
North Northamptonshire
Rotherham District (B)
City of Nottingham (B)
Peterborough City (B)
Doncaster District (B)
Cambridgeshire County
Nottinghamshire County
Norfolk County
Derbyshire County
Leicestershire County
Lincolnshire County

## **APPENDIX 2: RESPONDENTS TO CONSULTATION AND COPIES OF REPLIES**

<b>CONSULTATION BODIES WHO REPLIED BY THE STATUTORY DEADLINE:</b>
Anglian Water
Bassetlaw District Council
Bolsover District Council
The Canal and River Trust
City of Lincoln Council
The Coal Authority
East Lindsey District Council
The Environment Agency (Lincolnshire and Northamptonshire)
Fillingham Parish Council
Health and Safety Executive
Historic England
Lincolnshire County Council
Ministry of Defence
National Grid Electricity Transmission Plc and National Grid Gas Plc
NATS En-Route Safeguarding
Natural England
Network Rail
Newark and Sherwood District Council
North Kesteven District Council
North Lincolnshire Council
North Northamptonshire Council
Peterborough City Council

Sturton By Stow Parish Council
UK Health Security Agency
Uniper Energy
West Lindsey District Council

Emily Park  
Senior EIA Advisor  
The Planning Inspectorate

[CottamSolarProject@planninginspectorate.gov.uk](mailto:CottamSolarProject@planninginspectorate.gov.uk)

23 February 2022

Dear Emily

### **Cottam Solar Project - EIA Scoping Report consultation**

Thank you for the opportunity to comment on the scoping report for the above project which would be in West Lindsey District in Lincolnshire. A portion of the grid connection would be in Bassetlaw District in Nottinghamshire.

Anglian Water is the appointed water undertaker for the three sites shown and Grid Route corridor shown on Figure 1.1. Anglian Water is the sewerage undertaker for Cottam 1 and part of the grid connection area. The following response is submitted on behalf of Anglian Water in its statutory capacity and relates to potable water and water assets along with wastewater and water recycling assets. We would consider that Anglian Water should be included on the list of consultees to be drawn up by the applicant to follow their proposed approach to assessment and consultation on page 8, paragraph 2.1.2.

#### Engagement, the draft DCO Order and assisting the applicant

With reference to the project's engagement plans at 1.4.2, Anglian Water would welcome the instigation of discussions with Cottam Solar Project Limited prior to the project layout and initial design fix for arrays and grid connection infrastructure and to assist the applicant before the submission of the Draft DCO for examination. We note that the Report advises at table 24.1 that there are Anglian Water assets in edges and roads and verges in project area C03a. There are water and sewage assets in other locations which could be impacted by the proposed development. The offsets which Anglian Water requires are based on the size of pipeline and/or asset characteristics, the topographic and ground investigations and the nature of the works proposed. As a starting point for discussion on offsets or standoffs in our template Protective Provisions range from 2.25m to 6m for pipelines.

We would recommend discussion on the following issues:

1. The Draft DCO Order including protective provisions specifically to ensure Anglian Water's services are maintained during construction

2. Requirement for potable and raw water supplies
  3. Requirement for wastewater services
  4. Impact of development on Anglian Water's assets and the need for mitigation including the design parameters of the site required to ensure there is no disruption to Anglian Water's customers water supply and water recycling services
  5. Pre-construction surveys
- Anglian Water's role

Anglian Water's works to support the construction and operation of national infrastructure projects are conducted in accordance with the Water Industry Act 1991. We would expect that the Environmental Statement would include reference to existing water supply and water recycling infrastructure managed by Anglian Water and the provision of replacement infrastructure and the requirements for new infrastructure. Maps of Anglian Water's assets are available to view at the following address:

<http://www.digdat.co.uk/>

- The Scheme – Existing infrastructure

There are existing Anglian Water assets including water mains within the sites and water and wastewater infrastructure near the site or within roads which serve the site and the surrounding community. Anglian Water works with developers including those constructing projects under the 2008 Planning Act to ensure requests for alteration of sewers, wastewater and water supply infrastructure is planned to be undertaken with the minimum of disruption to the project and customers.

We agree with bullet point 3 on page 193 that 'construction of the Scheme has the potential to cause utility accidents, potentially damaging or cutting off the supply of utilities such as ... water, sewage'. That damage can also be caused by operational works, plant and vehicles running over or near pipelines. Anglian Water agrees and expects that the approach to protecting and diverting, where necessary, water and water recycling network pipelines will be agreed before the application is submitted (24.2.6). This agreement will include Protective Provisions, Construction Environmental Management Plan (4.3.7) and a record of that agreement in a Statement of Common Ground.

Anglian Water welcomes the intention to fully explore these matters with utilities and infrastructure operators (19.2.2, page 193). Anglian Water agrees that interruption to water and water recycling services has the potential to impact Human Health (21.2.7, page 204). We note that the widely drawn grid connection grid connection corridors between Cottam 1 and Cottam Power Station has the potential to impact existing water infrastructure and customers in Sturton by Stow, for example. There are existing water mains pipelines that cross the three solar array sites and serve local communities including Blyton, Pilham, Aisby, Corringham, Upton and Willingham by Stow.

Anglian Water considers that the inclusion of Telecommunications, Utilities and Television Receptors in a separate ES chapter (24.3.1) would enable appropriate consideration of these matters within the ES and so to assist the Examining Authority and Secretary of State in deciding the application. To quote the applicant at 24.2.1 and 24.2.2:

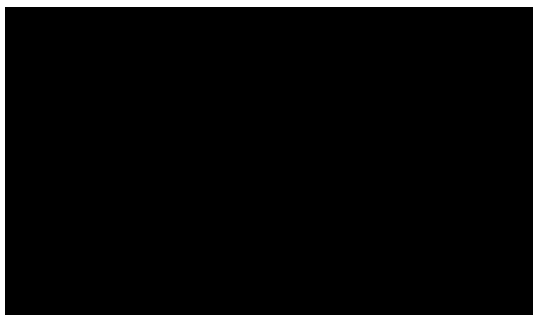
*There are a vast number of cables, pylons and pipelines crossing the Sites. There are properties, including homes, schools and businesses, in the surrounding area to the Site that benefit from access to utilities, telecommunications and television connections, for which many existing utilities run across or adjacent to the Sites.*

Anglian Water considers that these impacts and mitigation should not be scoped out and recommends that the Environmental Statement should include reference to identified impacts on water supply, the sewerage network and sewage treatment both during construction and operation. If required further advice on water and wastewater capacity and options can be obtained by contacting Anglian Water's Pre-Development Team ([planningliasion@anglianwater.co.uk](mailto:planningliasion@anglianwater.co.uk)).

- Surface drainage

Anglian Water welcomes that a Drainage Strategy Plan (4.4.6) will be prepared, and that SuDS will be used to manage surface water (9.2.47). Notwithstanding the lead role of the LLFA (9.2.53) and the EA and IDB (9.3.5), Anglian Water would welcome clarification that the use of and consequent impacts on the local drainage/ sewerage network (bullet 3, 9.2.47) will be designed out of the scheme given that there will be no mains foul connection and only SuDS will be used for both construction and operational stages.

Please do not hesitate to contact me should you require clarification on the above response or during the pre- application to decision stages of the project.



Darl Sweetland MRTPI  
Spatial Planning Manager

Cc  
[info@cottamsolar.co.uk](mailto:info@cottamsolar.co.uk)





**Bassetlaw**  
DISTRICT COUNCIL  
— North Nottinghamshire —

FAO : Emily Park  
The Planning Inspectorate  
Environmental Services  
Central Operations  
Temple Quay House  
2 The Square  
Bristol  
BS1 6PN

Our Ref: 22/00124/PREAPP  
Your Ref: EN010131-000007  
Officer: Clare Cook/Daniel Galphin  
Email: [planning@bassetlaw.gov.uk](mailto:planning@bassetlaw.gov.uk)

24 February 2022

Dear Emily,

**Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11**

**Application by Island Green Power Ltd (the Applicant) for an Order granting Development Consent for the Cottam Solar Project (the Proposed Development)**

**Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested**

I refer to your letter and enclosures dated 28<sup>th</sup> January 2022 regarding the above development.

The District Council understands that its views are sought, as a statutory consultee on the scoping opinion which has been submitted to the Secretary of State under the terms of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. The District Council also understands that the Secretary of State will consult all the relevant statutory bodies in respect of this scoping opinion.

This project is cross border with the main element of the proposed solar farm being within West Lindsey District Council and the cabling element and connection being within Bassetlaw District Council. The scoping report refers to the fact that the exact location of the proposed cabling is not yet known although *Appendix 3* of the EIA Scoping Report outlines that potential cable route corridors are currently being considered but only a narrow width within these areas are required. Temporary construction compounds will also be required.

The submitted scoping report contains the following chapters and I comment on them accordingly:

### **The Scheme**

The sites for built development are identified as being within a 19km radius of Cottam Power Station and are identified as Cottam 1, 2 and 3. *Appendix 3* in the EIA Scoping Report shows the exact locations of these sites. It is noted that the report also gives a detailed description of the physical characteristics and constraints of the surrounding areas which is welcomed.

It is noted that the exact type of solar panels is not yet decided and that the options have been separated into 'Option A – Tracking panels' and 'Option B – Fixed panels'. Further

assessment of the potential implications of the design should be considered and assessed in the ES when this option has been decided.

This is even more important when it comes to the cabling, the exact details of which (most notably the routing) are not yet known. This makes it more difficult to scope the overall project in detail.

### **Alternatives Considered**

It is encouraging that the ES will contain a chapter that will consider alternative sites. This overall section of the EIA Scoping Report however is thin in detail as to what the alternative sites will be. Given that the site for the main development has already been selected, it would have been preferable if some consideration had already been given to this.

### **Consultation**

It is promising to see that the applicant has already undertaken early consultation work with both Bassetlaw District Council and West Lindsey District Council alongside other statutory consultees. It is also welcomed that further consultation will be taken with statutory and non-statutory consultees as 2022 progresses. However, there are some concerns about the specific details with regarding to consultation with the community. The term 'local community' has not been clearly defined in terms of its scope. It is important that as many methods are used to consult the local community as possible given the isolated nature of many of the settlement that have the potential to be impacted by the proposals. We would be happy to assist the developer with the specifics of this approach.

Consultation with the Parish Councils, Neighbourhood Planning Groups and elected Members within Bassetlaw will also be very important in the consultation process. However, this will become more important once more details on the cabling are known.

### **Comments on the general approach**

As Bassetlaw District Council's jurisdiction falls within part of the cable search corridor and the anticipated connection point, the Council reserves the right to make further comments when more information is available to review in regards to the exact location of the cable corridor. The section entitled the 'Development Site' focusses on the main sites for the proposed solar panels and gives very little information in respect of the cabling areas (only one paragraph at 3.3). It is understood that at this point in time the precise cabling areas and type of cabling is not known; however once these are established the same exercise should be undertaken for these routes as the exercise that has been undertaken with regards to Cottam 1,2 and 3.

The issue of cumulative impact will need to be carefully considered as there are other NSIP projects in this locality for similar developments along with planning applications for the same. Whilst renewable energy is supported the ES must ensure that these cumulative impacts are assessed within both Bassetlaw, West Lindsey and other adjoining districts. It is noted that the scoping report states significant and committed developments will be assessed in this regard. However it should be noted that there are a number of other NSIPs in this locality that are at a similar stage to this application; these have not yet attained permission but need to be considered within the heading of cumulative impacts. Omitting the other potential NSIP sites gives a false assessment of environmental impacts. The District would be happy to assist in assessing and agreeing the applicant's list of other similar schemes in Nottinghamshire and Lincolnshire.

Each topic chapter should assess mitigation, this should be detailed and include a schedule of deliverable environmental commitments along with monitoring and control mechanisms. The order for mitigation should be avoid, minimise or reduce impact and remedy or compensate.

The ES should contain an appendix which sets out the evidence base documents that are to be used to inform the baseline would be welcomed. The evidence should be up to date and in accordance with the Regulations the District would be happy to assist in providing evidence where possible

In relation to the emerging Local Plan there have been further developments in this regard. The Council has recently undertaken a Regulation 19 Addendum consultation (ended on the 17 February, 2022). This Addendum together with the Publication version of the Plan will be submitted for Examination by the Secretary of State on 11 March 2022. This should be acknowledged and updated (eg at Paragraph 9.2.52)

There has been references made to Policy ST51 throughout the Scoping Document. This policy was part of the focussed Addendum consultation. Therefore, the reference at Paragraph 14.6.4 of the report will need to be updated to reflect this.

One policy included within the Draft Bassetlaw Local Plan that may also be relevant to this proposal and the Scoping Document is Policy ST6: Cottam Priority Regeneration Area (CPRA). Currently, land at the former Cottam Power Station site is identified as a broad location for mixed use regeneration. As such, the site will be safeguarded from development which would jeopardise the comprehensive remediation, reclamation and redevelopment of the whole site.

In paragraph 5.4 it is important to note that Bassetlaw District does have a number of neighbourhood plans which form part of the development plan. Those that are relevant (once the cabling route is fixed) should be assessed in any future ES.

It is important to have a consistent approach is taken with regards to the policy context of each chapter. In any event it appears that little reference has been made to Bassetlaw Local Plan policies, emerging Local Plan policies or made Neighbourhood Plans. Whilst it is appreciated the specific cabling route is not yet known it is crucial that the ES contains a full and up to date reference to Bassetlaw's planning policy.

## **Proposed Topics**

### **Climate Change**

The Council comments as follows in respect of climate change:

The reference at Paragraph 6.2.2 regarding BDC's climate commitment is welcome.

The methodology for climate and biodiversity related assessments are sound. It is noted that it is proposed to scope out climate adaptation as this will be contained within specific chapters of the ES such as 'Hydrology, Flood Risk and Drainage'. This is considered to be satisfactory subject to the impacts of climate change being explicitly referenced and assessed within these chapters. It is considered acceptable to scope out the potential impacts of sea level rise out of the ES.

It is considered that a full climate change chapter should be scoped into the ES rather than a proportionate one to allow a full assessment to be undertaken in this regard.

## **Landscape and Visual Amenity**

### **7.2.1 – Planning Policy Context and Guidance**

No reference is made to the relevant policies within the Bassetlaw Core Strategy, the Emerging Bassetlaw Local Plan (2020 – 2037) or made Neighbourhood Plans.

A further review of relevant policies contained within the NPPF is also recommended eg para 174 is not quoted. It also appears that there are errors in the NPPF paragraph numbering eg should paragraph 98 be paragraph 100?

This is one of the key considerations for the District. However, without more precise details, it is difficult to make full substantive comments on the methodology. It is impossible at this stage to assess whether a 500m study area (para 7.1.9) is going to be sufficient without knowing the full extent and the design of the cabling. Obviously the issue of cumulative development will be critical to this chapter and will need to be considered when agreeing receptor sites. No receptor or viewpoints for Bassetlaw have been included in the scoping report for this chapter and these will need to be agreed. Therefore the distance of a 500m study area is not agreed by the District Council at this point in time.

Bassetlaw District Council has concluded a landscape assessment on Cottam Power Station and the proposals highlighted in ST6. The [Bassetlaw Local Landscape Assessment Addendum Document September 2020](#) suggest that there are important landscape, nature conservation and heritage considerations to take into account in considering a redevelopment of the site. Features including Cottam Wetlands, the former ash tip, existing trees and hedges, recreational routes (including the Torksey Viaduct) must be retained, but there is scope for a successful and sustainable redevelopment of the site. It is acknowledged that the type and scale of development proposed differs but the recommendations of the assessment should be considered as part of the next steps.

I would raise caution with scoping out a preliminary area of 5km. The amount of cumulative development that is proposed within the surrounding area may mean that a greater distance is required. Whilst it is appreciated that the scoping report is trying to set out parameters with regards to landscaping the visual study area needs to be agreed with the Council's consultant (who is in the process of being engaged) and until this time the study areas are not agreed by the District.

It is considered that this chapter is overlapping with other chapters eg heritage and biodiversity. Whilst it is appreciated that there is some overlap the chapter needs to be clear at the beginning as to what it intends to assess otherwise the document will become repetitive and confusing for the reader/assessor.

Once the details are known early discussions are recommended with both District's and their landscape consultant to set out how the landscape and visual assessment chapter will be developed and the proposed viewpoints and study areas should be agreed with the local authorities prior to commencement of the ES.

## **Ecology and Biodiversity**

Please see attached comments from Nottinghamshire Wildlife Trust.

Again there is little reference to the cabling routes other than there will be limited ecological disturbance. This is not agreed at this point in time as the effects on ecology and biodiversity cannot be established until the routes have been defined. It also states that only

a desktop survey is proposed for the cabling routes; again this is not agreed and the District would expect to see full ecological surveys undertaken for these routes.

It is important to mention that the cable search corridor area impacts upon a Main green corridor in the form of the River Trent (Local Plan policy ST39: Green and Blue Infrastructure). Should the area be chosen as part of the cable corridor impact upon the green corridor care should be taken to protect the function, setting, biodiversity value, landscape, access and recreational value of the Main corridor. It is worth noting that in close proximity to the Cottam Power Station site, a Local Wildlife Site designation covers a significant part (Eastern side of the site – site ID 1/101). It is understood that scoping has been undertaken for residual effects on ecological features as indicated in Table 8.1. It would be prudent to understand the level of impact and ensure that mitigation is commensurate to address impacts identified.

Whilst the Bassetlaw Core Strategy 2011 is quoted in the policy section, there is no reference to the emerging Local Plan or any made Neighbourhood Plans. Another key document is 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services' as this is the most recent Defra approved strategy for biodiversity in the UK. For meaningful policy to enhance local biodiversity the core 4 principles **must** be included in their enhancement criteria: Better, Bigger, More, Joined.

The need for 10% net gain is welcomed and this should be scoped into the assessment. The Environment Act 2021 promotes biodiversity net gain in new development, albeit from 2023. However, the NPPF recommends securing net gains now. Reflecting the principles of national planning policy and the emerging provisions of the Act we would strongly recommend that the proposal secures at least 10% net gain in biodiversity to ensure that the value of the development exceeds the pre-development on site habitat value by at least 10%.

Lighting, even during construction phase, has the potential to impact on ecology and given the fact that there are still unknowns in respect of the location and design of this proposal it is considered that lighting should remain in the EIA and its effect on ecology should form part of this chapter.

It is considered that nothing should be scoped out of this chapter.

### **Hydrology, Flood Risk and Drainage**

The scoping report acknowledges that the work relating to the cable areas is less advanced than the other 3 sites and therefore at this point in time little comment can be made on the scope in respect of the cabling areas within Bassetlaw.

The council welcomes reference to Policies ST52 Flood Risk and Drainage and ST53 Protecting Water Quality and Management. Further detail on flood impacts and drainage solutions would be welcome. The [Level 2 Strategic Flood Risk Assessment in June 2021](#) concluded that the Cottam Priority Regeneration Area was found to be highly susceptible to groundwater flooding. Whilst it is acknowledged that this proposal may not have the same impact on flood risk as mixed use regeneration, such issues should be given due consideration in the planning process.

It is welcomed that nothing is proposed to be scoped out of this chapter

### **Ground Conditions and Contamination**

Again it is acknowledged that the cabling element in this regard is less advanced. The Council would expect full investigations to be undertaken with respect of this topic for the areas that will affect Bassetlaw.

It is welcomed that this topic is scoped in at this point in time until further discussions with relevant officers have been undertaken.

## **Minerals**

The safeguarding of minerals is given local and national importance in the Section 17 of the NPPF (facilitating the sustainable use of minerals) and the Policy SP7 of the Nottinghamshire County Council Minerals Local Plan. It is proposed to scope consideration of mineral safeguarding out of the ES as the proposed scheme is for a temporary period and as such, any mineral sterilisation would not be permanent. This is considered to be acceptable but it is recommended that ongoing consultation is done with the County Planning Authorities at Nottinghamshire County Council and Lincolnshire County Council to properly determine whether this approach is acceptable. Given that Bassetlaw will only include the cabling it is very possible that there will be no mineral safeguarding consideration as the final routing of cables will only include a very small section of the search area for potential cable routes.

Please see the response from The Coal Authority, this reads as follows:

*“I can confirm that the area of cabling and grid connections within the administrative area of Bassetlaw District Council falls outside the coalfield area. Accordingly, if it is considered that the application is EIA development, there is no requirement for the applicant to consider coal mining legacy or mineral safeguarding as part of their Environmental Impact Assessment. In addition, there will be no need to consult us on any subsequent planning application for this site.”*

## **Archaeology**

Advice from the Council's Archaeological Advisor states:

*“The Cottam Solar Project Scoping Opinion provides details for the construction of a 600MW solar farm spread over three sites and a substation/energy store facility and cable corridors. All three main sites are located in Lincolnshire, however part of the proposed cable connection routes and substation will be located in Nottinghamshire (Bassetlaw) with the connection point proposed at the Cottam Power Station. The following relates primarily to the proposed cable connection routes and associated substations/stores proposed for Bassetlaw.*

*I have not been consulted prior to submission of this scoping report and have significant concerns on the Cultural Heritage section (section 12) of the submitted documents.*

*I am disappointed to note that the applicant has not engaged prior to this submission or to undertaking/commissioning geophysical survey work, which may not meet the standards and quality control requirements expected.*

*It is also concerning that the cable corridor routes have not been determined and therefore not considered other than a vague statement in section 12.1.2. The Environmental Impact Assessment (EIA) will need to include all scoped in cable routes and substation sites in the form of desk-based research, non-intrusive and intrusive evaluation and be included in the ES (Environmental Statement) prior to submission of the Development Consent Order (DCO) application.*



*The review and initial assessment of assets presented in this document is based on very limited data and many of the conclusions drawn cannot be justified at this stage without further desk-based research, non-intrusive and intrusive evaluation. The following are just some of the statements with which I cannot currently agree:*

*Section 12.2.17 states that 'Despite the lack or limited nature of previously recorded evidence for prehistoric and Roman period activity....the results of the geophysical survey have identified concentrations of anomalies that could represent settlements and enclosures of a late prehistoric or Roman period date.' The lack of site-specific information is an indication of limited investigation rather than limited archaeological potential.*

*Section 12.2.18 goes on to say that even if archaeological remains of prehistoric or Roman periods are present in the Site 'There is no evidence however to suggest the presence of any remains of a greater than local significance'; Such a statement is entirely unfounded until it is informed by trial trenching. The statement regarding assumed diminished significance is an unhelpful and unjustifiable theme throughout the document. The author is presupposing that locally significant archaeology which is impacted by the development should not be dealt with. As no fieldwork has been completed this is based entirely upon a limited selection of desk-based sources and a partial ongoing geophysical survey. This is entirely insufficient grounds as a basis for competent assessment of the archaeological potential.*

*The Methodology for further Evaluation and Mitigation states that 'where it is identified that there may be potential...further archaeological evaluation will be taken' (Section 12.3.13) This is unacceptable. This would only give us more information on what is already known. The absence of information does not mean an absence of archaeology. The full extent of the proposed impact zone needs to be evaluated with geophysics informing a programme of trial trenching and those results will inform the archaeological mitigation. This cannot be done until the location, depth, extent and importance of surviving archaeology has been determined through a programme of effective evaluation.*

*We also disagree with the proposed scoping out of direct impacts upon designated heritage assets (12.4.2) as the potential impacts have not been sufficiently assessed.*

*There needs to be an approach with sufficient evaluation in order to fully understand the archaeological potential and to inform a reasonable appropriate mitigation strategy to be submitted with the DCO application. The full suite of available desk-based information needs to be competently assessed including all available records, air photos, LiDAR and local sources. This understanding and the geophysical survey results then inform a robust programme of trial trenching to provide evidence for the site-specific archaeological potential of the development.*

*Given the above, the general methodology proposed in this document is currently insufficient and there is insufficient baseline evidence to support it.*

### **Requirements for Environmental Statement**

*The ES will require further desk-based research, non-intrusive surveys, and intrusive field evaluation for the full extent of proposed impact areas, including the cable route corridors and any associated structures. The results should be used to minimise the impact on the historic environment through informing the project design and an appropriate programme of archaeological mitigation secured in the DCO.*

*Regarding desk-based sources, the Environmental Statement will require:*

*Full LiDAR coverage and assessment; full aerial photo coverage and assessment; archaeological reports; relevant documents from the Record Office covering each site; and the Portable Antiquities Scheme (PAS) data must also be consulted.*

*Map regression should include all available maps to provide a reasonable understanding of the development of the sites.*

*The HER search should be for at least 5km for visual impact on designated assets.*

*The wide-ranging options for the cable routes currently impact known scheduled monuments and highly sensitive areas of known archaeology. There will also be multiple areas of as yet unknown archaeological remains which must be identified and characterised at the assessment phase.*

*The subsequent mitigation strategy has the potential for significant financial and scheduling impacts. Sufficient evaluation is essential in informing the selection process and in ensuring the subsequent design and work programme is devised with an understanding of the level of archaeological work which may be required before and during the construction phase. Pre-determination evaluation of the cable connection corridors and associated structures can be very useful with informing a decision on the most cost effective and viable route/locations.*

#### *Geophysical Survey*

*It is apparent from the documents that geophysical survey has already commenced. As there has been no engagement to date and no Written Scheme of Investigation has been submitted, I also have concerns about the methodology, practice and extent of the work which is currently being undertaken and what quality control mechanisms have been put in place.*

*Regardless of the approach to geophysical survey already employed, I would expect the following as a minimum: a single Written Scheme of Investigation that all contractors adhere to. This must include appropriate quality and control measures to ensure consistency of data recovery across the site. The proposed cable route(s) must be included in the survey. Separate reports from each contractor should be supplied in full with an overarching report presenting the combined results as this will be the basis for the subsequent evaluation trenching.*

#### *Evaluation Trenching*

*Trenching results are essential for effective risk management and to inform programme scheduling and budget management. Failing to do so could lead to unnecessary destruction of heritage assets, potential programme delays and excessive cost increases that could otherwise be avoided. A programme of trial trenching is required to inform a robust mitigation strategy which will need to be agreed by the time the Environmental Statement is produced and submitted with the DCO application.*

#### *Settings Assessment*

*Regarding a competent Settings Assessment, the application site may affect the setting of several Scheduled Monuments as well as a large number of designated and non-designated heritage assets. The Settings Assessment/Heritage Impact Assessment needs to begin from an understanding of the significance of each of those assets in order to assess the potential impact of the development on them and put forward any potential benefit or mitigation of proposed negative impact.*

*In conclusion, the Environmental Impact Assessment (EIA) will require desk-based research, non-intrusive surveys, and intrusive field evaluation for the full extent of proposed impact including the cable connection corridor routes and associated structures. The results should be used to minimise the impact on the historic environment through informing the project design and an appropriate programme of archaeological mitigation. The provision of*



sufficient baseline information to identify and assess the impact on known and potential heritage assets is required by Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (Regulation 5 (2d)), National Planning Statement Policy EN1 (Section 5.8), and the National Planning Policy Framework.

The EIA will need to contain sufficient information on the archaeological potential and must include evidential information on the depth, extent and significance of the archaeological deposits which will be impacted by the development. The results will inform a fit for purpose mitigation strategy which will identify what measures are to be taken to minimise or adequately record the impact of the proposal on archaeological remains.

This is in accordance with The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 states **"The EIA must identify, describe and assess in an appropriate manner...the direct and indirect significant impacts of the proposed development on...material assets, cultural heritage and the landscape."** (Regulation 5 (2d))"

## **Built Heritage**

Advice from the Council's Conservation Officer is as follows (also please see enclosed response.):

*"This proposal would see a solar farm development comprising 3 distinct sites, all on the east side of the River Trent and some distance from it, very much outside of the Bassetlaw boundary. However, there would be power connections into Bassetlaw, connecting to the existing Cottam substation and land in the vicinity.*

- *Within the affected area are 2 Scheduled Ancient Monuments, these being the roman town at Littleborough, and the Fleet Plantation Moated Site. There are a range of Listed Buildings in the vicinity, including Holy Trinity Church and the adjacent Font (both grade II), Church of St Nicholas (grade I), Ferry Farmhouse (grade II) and Littleborough Toll Bar (grade II). There are also several non-designated heritage assets, including the power station and cooling towers at Cottam. These are all identified on the Council's 'Bassetlaw Heritage Mapping' web page: <https://www.bassetlaw.gov.uk/planning-and-building/planning-services/conservation-and-heritage/bassetlaw-heritage-mapping/>*
- *There are a number of complex archaeological sites in the area affected, identified on aerial photographs/the NMP and from fieldwork. The significance of these, and their implications on this proposal, will be addressed separately by our Archaeologist from Lincolnshire County Council, Matt Adams.(see above)*
- *The majority of the visual impact will be on the Lincolnshire side of the river. Within Bassetlaw, from an above-ground heritage point of view, an underground cable route would be very much preferred to an overhead one. The landscape in that part of Bassetlaw district, being adjacent the Trent, is very flat and open (see attached contour map), so overhead cabling and supporting structures would have a big visual impact for a considerable distance, and will undoubtedly affect the setting of a range of heritage assets along or close to the route.*
- *The proposed Cottam Solar Park would not appear to include any new associated structures such as substations, fencing or cabins, other than temporary ones during the construction phase. This is very much welcomed.*

- *A buried cable option would likely require excavations of 1.4m depth. Archaeological work would be required, including geophysical surveys of the affected areas. I would defer to the views of our Archaeologist on this matter.*
- *During the Gate Burton project meeting, it was considered that a route near or through Littleborough would be the most complex, given the archaeological significance of the Scheduled Ancient Monument and surrounding area, so the southern routes around Cottam village were considered the most likely. I would suggest this also be the case for the Cottam Solar Park project.*
- *Landscape impact surveying should include views from high points within Bassetlaw (contour map attached), both alongside the river and from further away (e.g. Sturton le Steeple, South Leverton, etc), especially having regard to vistas from both roads and public footpaths. Although given the distances involved, it is considered unlikely there would be any visual impact from the Bassetlaw side.*
- *Similarly, views of Bassetlaw assets from the east side of the river should also be considered (e.g. Sturton le Steeple church spire). As we have recently found with several other solar farm proposals in Bassetlaw recently, those key views might extend several miles and be less obvious until seen on the ground. But again, this is considered less likely an issue for Cottam, given the distances involved between those assets and the 3 solar farm sites.*

*In reaching these views, I have had regard to: Section 66(1) of the Planning (Listed Buildings & Conservation Areas) Act 1990; Policy DM8 of the Bassetlaw Core Strategy (December 2011); Section 16 of the NPPF (July 2021); and guidance contained in Historic England's Advice Note 15 - Commercial Renewable Energy Development (Feb 2021)."*

## **Transport and Access**

Please see the response from Nottinghamshire County Council as the Highway Authority, this reads as follows:

The Grid Connection Corridor (GCC) has the potential to affect several public rights of way in Nottinghamshire. Nottinghamshire County Council's Countryside Access Team will provide a separate response.

*"The EIASR confirms that a Transport Assessment (TA), Construction Traffic Management Plan (CTMP), and a Construction Environment Management Plan will form part of the Environmental Impact Assessment to be submitted in support of the proposal. The scope of the TA and CTMP will include the GCC. The CTMP should also include a chapter on construction worker travel patterns and measures to encourage travel by alternative modes to single occupancy vehicle.*

*The TA methodology is to be based on the DfT Guidance on Transport Assessments, 2007 (GTA) and the Institute of Environmental Management and Assessment Guidelines for the Environmental Assessment of Road Traffic, 1993. Whilst the GTA is now archived, this still would provide a methodology that complies with more recent National Planning Practice Guidance. The methodology is therefore acceptable. The Nottinghamshire Highway Authority will require the scope of the TA to consider all main junctions within Nottinghamshire that would be likely to experience an increase in traffic greater than 30 two-way peak hour movements (based on passenger car units (PCU)). This is likely to be limited to the construction of the grid connection and associated infrastructure as the proposed*

*construction routes to the solar farm sites avoid Nottinghamshire. Where the TA addresses environmental impacts, this should be contained within a separate section to avoid confusion. It would also be helpful if the study area could be split into respective local highway authority areas.”*

It is crucial that a full analysis of any affected public rights of ways is undertaken once the cabling routes are known. If temporary closures are necessary during the construction phase it is requested that these closures, wherever practicable, are employed sensitively to optimise the connectivity of the wider PROW network. In order to fully consider the PROW network and the impact of the proposal on the network, the applicant should undertake a full assessment of the PROW network and apply for a search of the Definitive Map for Public Rights of Way [row.landsearches@nottscc.gov.uk](mailto:row.landsearches@nottscc.gov.uk). The Nottinghamshire County Council Rights of Way team would welcome discussions regarding the enhancement and improvements to the Public Rights of Way network.

### **Noise and Vibration**

Given the fact that the details of the design and location of the proposed cabling is not yet known it is considered that ground vibration or noise should not be scoped out of the ES.

### **Glint and Glare**

No comment to make on this topic, the District is pleased to see that it is scoped into the ES.

### **Electromagnetic Fields**

Human health is a material consideration and the District consider that this should be scoped into the ES.

### **Lighting**

It is agreed that this does not have to be a standalone chapter; however it will need to be addressed in other relevant chapters such as biodiversity, transport etc.

### **Major Accidents and Disasters**

The scope for this topic is agreed.

### **Air Quality**

The scope for this topic is agreed providing that mitigation measures are reported in the CEMP.

### **Socio-Economics, Tourism, Recreation and Human Health**

As stated in Paragraph 21.2.1 of the Scoping Report, the scale and geographic distribution of the proposals means that its effects have the potential to impact a significant geographic area and the associated population. As part of the cable route and the connection point are within Bassetlaw District, the inclusion of a joint district area assessment in the form of a Local Impact Area for socio-economic, tourism and recreation, and human health impacts is welcomed.

Public Health comments are contained within the response from Nottinghamshire County Council.

## **Agricultural Circumstances**

It is considered that this is an important issue for the relevant Districts, especially when considering these proposals cumulatively with other similar proposals. It therefore should be scoped into the ES. If this approach is not taken then it is crucial that it is addressed elsewhere in another topic.

## **Waste**

Please refer to Nottinghamshire County Council response.

## **Telecommunications, Utilities and Television Receptors**

The proposed approach to this chapter is agreed

## **Summary**

The table at 25.1 regarding minerals should state that the cabling areas should be scoped in at this stage as per the main body of the report, or the main body of the report should be changed.

It is considered that all of archaeology and built heritage needs to be scoped in. It is not acceptable to scope out the impacts on some heritage assets or direct impacts on heritage assets.

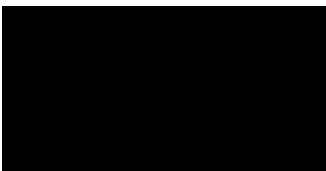
Noise and vibration should not yet be scoped out in respect of the cabling routes as the exact location is not known.

Light pollution also needs to be covered in the transport topic and human health.

The summary table needs clarification as it states a chapter on lighting is scoped out but will be covered in the landscape chapter; however the landscape chapter states that lighting is scoped out.

This forms a response from Bassetlaw District Council on the applicant's scoping opinion for the Cottam NSIP and we would be grateful if the comments contained within it can be considered as part of your formal scoping response.

Yours faithfully



Development Team Manager

Enc

Archaeological Advice

Bassetlaw Conservation Manager Response

Nottinghamshire County Council Highway Officer's response

Nottinghamshire County Council Response

Nottinghamshire Wildlife Trust response

## **Cottam Solar Project, Scoping Opinion – Historic Environment Comments Bassetlaw**

The Cottam Solar Project Scoping Opinion provides details for the construction of a 600MW solar farm spread over three sites and a substation/energy store facility and cable corridors. All three main sites are located in Lincolnshire, however part of the proposed cable connection routes and substation will be located in Nottinghamshire (Bassetlaw) with the connection point proposed at the Cottam Power Station. The following relates primarily to the proposed cable connection routes and associated substations/stores proposed for Bassetlaw.

I have not been consulted prior to submission of this scoping report and have significant concerns on the Cultural Heritage section (section 12) of the submitted documents.

I am disappointed to note that the applicant has not engaged prior to this submission or to undertaking/commissioning geophysical survey work, which may not meet the standards and quality control requirements expected.

It is also concerning that the cable corridor routes have not been determined and therefore not considered other than a vague statement in section 12.1.2. The Environmental Impact Assessment (EIA) will need to include all scoped in cable routes and substation sites in the form of desk-based research, non-intrusive and intrusive evaluation and be included in the ES (Environmental Statement) prior to submission of the Development Consent Order (DCO) application.

The review and initial assessment of assets presented in this document is based on very limited data and many of the conclusions drawn cannot be justified at this stage without further desk-based research, non-intrusive and intrusive evaluation. The following are just some of the statements with which I cannot currently agree:

Section 12.2.17 states that *'Despite the lack or limited nature of previously recorded evidence for prehistoric and Roman period activity....the results of the geophysical survey have identified concentrations of anomalies that could represent settlements and enclosures of a late prehistoric or Roman period date.'* The lack of site-specific information is an indication of limited investigation rather than limited archaeological potential.

Section 12.2.18 goes on to say that even if archaeological remains of prehistoric or Roman periods are present in the Site *'There is no evidence however to suggest the presence of any remains of a greater than local significance'*; Such a statement is entirely unfounded until it is informed by trial trenching. The statement regarding assumed diminished significance is an unhelpful and unjustifiable theme throughout the document. The author is presupposing that locally significant archaeology which is impacted by the development should not be dealt with. As no fieldwork has been completed this is based entirely upon a limited selection of desk-based sources and a partial ongoing geophysical survey. This is entirely insufficient grounds as a basis for competent assessment of the archaeological potential.

The Methodology for further Evaluation and Mitigation states that *'where it is identified that there may be potential...further archaeological evaluation will be taken'* (Section 12.3.13) This is unacceptable. This would only give us more information on what is already known. The absence of information does not mean an absence of archaeology. The full extent of the proposed impact zone needs to be evaluated with geophysics informing a programme of trial trenching and those results will

inform the archaeological mitigation. This cannot be done until the location, depth, extent and importance of surviving archaeology has been determined through a programme of effective evaluation.

We also disagree with the proposed scoping out of direct impacts upon designated heritage assets (12.4.2) as the potential impacts have not been sufficiently assessed.

There needs to be an approach with sufficient evaluation in order to fully understand the archaeological potential and to inform a reasonable appropriate mitigation strategy to be submitted with the DCO application. The full suite of available desk-based information needs to be competently assessed including all available records, air photos, LiDAR and local sources. This understanding and the geophysical survey results then inform a robust programme of trial trenching to provide evidence for the site-specific archaeological potential of the development.

Given the above, the general methodology proposed in this document is currently insufficient and there is insufficient baseline evidence to support it.

### **Requirements for Environmental Statement**

The ES will require further desk-based research, non-intrusive surveys, and intrusive field evaluation for the full extent of proposed impact areas, including the cable route corridors and any associated structures. The results should be used to minimise the impact on the historic environment through informing the project design and an appropriate programme of archaeological mitigation secured in the DCO.

Regarding desk-based sources, the Environmental Statement will require:

Full LiDAR coverage and assessment; full aerial photo coverage and assessment; archaeological reports; relevant documents from the Record Office covering each site; and the Portable Antiquities Scheme (PAS) data must also be consulted.

Map regression should include all available maps to provide a reasonable understanding of the development of the sites.

The HER search should be for at least 5km for visual impact on designated assets.

The wide-ranging options for the cable routes currently impact known scheduled monuments and highly sensitive areas of known archaeology. There will also be multiple areas of as yet unknown archaeological remains which must be identified and characterised at the assessment phase.

The subsequent mitigation strategy has the potential for significant financial and scheduling impacts. Sufficient evaluation is essential in informing the selection process and in ensuring the subsequent design and work programme is devised with an understanding of the level of archaeological work which may be required before and during the construction phase. Pre-determination evaluation of the cable connection corridors and associated structures can be very useful with informing a decision on the most cost effective and viable route/locations.

### *Geophysical Survey*

It is apparent from the documents that geophysical survey has already commenced. As there has been no engagement to date and no Written Scheme of Investigation has been submitted, I also have concerns about the methodology, practice and extent of the work which is currently being undertaken and what quality control mechanisms have been put in place.

Regardless of the approach to geophysical survey already employed, I would expect the following as a minimum: a single Written Scheme of Investigation that all contractors adhere to. This must include appropriate quality and control measures to ensure consistency of data recovery across the site. The proposed cable route(s) must be included in the survey. Separate reports from each contractor should be supplied in full with an overarching report presenting the combined results as this will be the basis for the subsequent evaluation trenching.

#### *Evaluation Trenching*

Trenching results are essential for effective risk management and to inform programme scheduling and budget management. Failing to do so could lead to unnecessary destruction of heritage assets, potential programme delays and excessive cost increases that could otherwise be avoided. A programme of trial trenching is required to inform a robust mitigation strategy which will need to be agreed by the time the Environmental Statement is produced and submitted with the DCO application.

#### *Settings Assessment*

Regarding a competent Settings Assessment, the application site may affect the setting of several Scheduled Monuments as well as a large number of designated and non-designated heritage assets. The Settings Assessment/Heritage Impact Assessment needs to begin from an understanding of the significance of each of those assets in order to assess the potential impact of the development on them and put forward any potential benefit or mitigation of proposed negative impact.

In conclusion, the Environmental Impact Assessment (EIA) will require desk-based research, non-intrusive surveys, and intrusive field evaluation for the full extent of proposed impact including the cable connection corridor routes and associated structures. The results should be used to minimise the impact on the historic environment through informing the project design and an appropriate programme of archaeological mitigation. The provision of sufficient baseline information to identify and assess the impact on known and potential heritage assets is required by Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (Regulation 5 (2d)), National Planning Statement Policy EN1 (Section 5.8), and the National Planning Policy Framework.

The EIA will need to contain sufficient information on the archaeological potential and must include evidential information on the depth, extent and significance of the archaeological deposits which will be impacted by the development. The results will inform a fit for purpose mitigation strategy which will identify what measures are to be taken to minimise or adequately record the impact of the proposal on archaeological remains.

This is in accordance with The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 states "***The EIA must identify, describe and assess in an appropriate manner...the direct and indirect significant impacts of the proposed development on...material assets, cultural heritage and the landscape.***" (Regulation 5 (2d))

**From:**



**Subject:**

Re: 22-00124-PREAPP - Land to N and Surrounding Cottam Power Station

**Date:**

21 February 2022 17:22:38

**Attachments:**

[East Bassetlaw contours.jpg](#)

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Clare

This proposal would see a solar farm development comprising 3 distinct sites, all on the east side of the River Trent and some distance from it, very much outside of the Bassetlaw boundary. However, there would be power connections into Bassetlaw, connecting to the existing Cottam substation and land in the vicinity.

Conservation recently attended a meeting for the proposed Gate Burton scheme, the implications of which were largely the same as this proposal, albeit some of the solar arrays would be closer to the River Trent. For this proposal, I would therefore repeat most of the comments made for that alternative scheme:

- Within the affected area are 2 Scheduled Ancient Monuments, these being the roman town at Littleborough, and the Fleet Plantation Moated Site. There are a range of Listed Buildings in the vicinity, including Holy Trinity Church and the adjacent Font (both grade II), Church of St Nicholas (grade I), Ferry Farmhouse (grade II) and Littleborough Toll Bar (grade II). There are also several non-designated heritage assets, including the power station and cooling towers at Cottam. These are all identified on the Council's 'Bassetlaw Heritage Mapping' web page: <https://www.bassetlaw.gov.uk/planning-and-building/planning-services/conservation-and-heritage/bassetlaw-heritage-mapping/>
- There are a number of complex archaeological sites in the area affected, identified on aerial photographs/the NMP and from fieldwork. The significance of these, and their implications on this proposal, will be addressed separately by our Archaeologist from Lincolnshire County Council, Matt Adams.
- The majority of the visual impact will be on the Lincolnshire side of the river. Within Bassetlaw, from an above-ground heritage point of view, an underground cable route would be very much preferred to an overhead one. The landscape in that part of Bassetlaw district, being adjacent the Trent, is very flat and open (see attached contour map), so overhead cabling and supporting structures would have a big visual impact for a considerable distance, and will undoubtedly affect the setting of a range of heritage assets along or close to the route.
- As with Gate Burton, the proposed Cottam Solar Park would not appear to include any new associated structures such as substations, fencing or cabins, other than temporary ones during the construction phase. This is very much welcomed.
- A buried cable option would likely require excavations of 1.4m depth. Archaeological work would be required, including geophysical surveys of the affected areas. I would defer to the views of our Archaeologist on this matter.
-



During the Gate Burton project meeting, it was considered that a route near or through Littleborough would be the most complex, given the archaeological significance of the Scheduled Ancient Monument and surrounding area, so the southern routes around Cottam village were considered the most likely. I would suggest this also be the case for the Cottam Solar Park project.

- Landscape impact surveying should include views from high points within Bassetlaw (contour map attached), both alongside the river and from further away (e.g. Sturton le Steeple, South Leverton, etc), especially having regard to vistas from both roads and public footpaths. Although given the distances involved, it is considered unlikely there would be any visual impact from the Bassetlaw side.
- Similarly, views of Bassetlaw assets from the east side of the river should also be considered (e.g. Sturton le Steeple church spire). As we have recently found with several other solar farm proposals in Bassetlaw recently, those key views might extend several miles and be less obvious until seen on the ground. But again, this is considered less likely an issue for Cottam, given the distances involved between those assets and the 3 solar farm sites.

In reaching these views, I have had regard to: Section 66(1) of the Planning (Listed Buildings & Conservation Areas) Act 1990; Policy DM8 of the Bassetlaw Core Strategy (December 2011); Section 16 of the NPPF (July 2021); and guidance contained in Historic England's Advice Note 15 - *Commercial Renewable Energy Development* (Feb 2021).

I trust this is of use.

Regards, Michael

**Michael S. A. Tagg BA (Hons), MSc, IHBC**

Conservation Manager  
Planning Services  
Bassetlaw District Council  
Queens Buildings  
Potter Street  
Worksop  
Nottinghamshire  
S80 2AH

Tel: [REDACTED]

You will appreciate that the above comments are made at officer level only and do not prejudice any decision taken at a later date by the Council.

Michael Tagg  
Conservation Manager

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**TOWN AND COUNTRY PLANNING ACT**

**HIGHWAY REPORT ON PROPOSALS FOR DEVELOPMENT (PRE-PLANNING APPLICATION  
ADVICE)**

<b>DISTRICT:</b>	Bassetlaw	Date received	01/02/2022
<b>OFFICER:</b>	Clare Cook	by D.C.	
<b>PROPOSAL:</b>	Application for an Order Granting Development Consent for the Cottam Solar Project	D.C. No.	22/00124/PREAPP
<b>LOCATION:</b>	West Lindsey District, Lincolnshire		
<b>APPLICANT:</b>	Cottam Solar Project Limited		

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The Grid Connection Corridor (GCC) has the potential to affect several public rights of way in Nottinghamshire. It is noted that this Authority's Countryside Access Team has been consulted.

The EIASR confirms that a Transport Assessment (TA), Construction Traffic Management Plan (CTMP), and a Construction Environment Management Plan will form part of the Environmental Impact Assessment to be submitted in support of the proposal. The scope of the TA and CTMP will include the GCC. The CTMP should also include a chapter on construction worker travel patterns and measures to encourage travel by alternative modes to single occupancy vehicle.

The TA methodology is to be based on the DfT Guidance on Transport Assessments, 2007 (GTA) and the Institute of Environmental Management and Assessment Guidelines for the Environmental Assessment of Road Traffic, 1993. Whilst the GTA is now archived, this still would provide a methodology that complies with more recent National Planning Practice Guidance. The methodology is therefore acceptable. The Nottinghamshire Highway Authority will require the scope of the TA to consider all main junctions within Nottinghamshire that would be likely to experience an increase in traffic greater than 30 two-way peak hour movements (based on passenger car units (PCU)). This is likely to be limited to the construction of the grid connection and associated infrastructure as the proposed construction routes to the solar farm sites avoid Nottinghamshire. Where the TA addresses environmental impacts, this should be contained within a separate section to avoid confusion. It would also be helpful if the study area could be split into respective local highway authority areas.

Martin Green  
Principal Officer  
2<sup>nd</sup> February 2022

This matter is being dealt with by:  
**Nina Wilson**  
Ref: EN010131-000007  
T [REDACTED]  
E [REDACTED]@nottsc.gov.uk  
W nottinghamshire.gov.uk

Sent via email to:

[CottamSolarProject@planninginspectorate.gov.uk](mailto:CottamSolarProject@planninginspectorate.gov.uk)

22<sup>nd</sup> February 2021

Dear Emily,

**Ref: Planning Act 2008 and the Infrastructure Planning (EIA) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11 – Application by Cottam Solar Project Ltd (The Applicant) for the Order granting Development Consent for Cottam Solar Project (The Proposed Development)**

Thank you for your email dated 28<sup>th</sup> January 2022 requesting strategic planning observations on the above planning application. I have consulted with my colleagues across relevant divisions of the County Council and have the following comments to make.

In terms of the County Council's responsibilities there are a number of elements of national planning policy and guidance that are of particular relevance in the assessment of planning applications these include Minerals and Waste, Education, Transport and Public Health.

## **County Planning Context**

### Transport

The County Council as Highway Authority and Local Lead Flood Authority is a statutory consultee to Local Planning Authorities and therefore makes separate responses on the relevant highway and flood risk technical aspects for planning applications.

### Minerals and Waste

The adopted Nottinghamshire and Nottingham Replacement Waste Local Plan, Part 1: Waste Core Strategy (adopted 10 December 2013) and the saved, non-replaced policies of the Waste Local Plan (adopted 2002), along with the adopted Nottinghamshire Minerals Local Plan (adopted March 2021), form part of the development plan for the area. As such, relevant policies in these plans need to be considered. In addition, Minerals Safeguarding and Consultation Areas (MSA/MCA) have been identified in Nottinghamshire and in accordance with Policy SP7 of the Nottinghamshire Minerals Local Plan, these should be taken into account where proposals for non-minerals development fall within them.

From the point of the Scoping Report, Chapter 11: Minerals, draws attention to the Minerals Safeguarding Area policies within the respective Minerals Local Plans. West Burton 4 being the only site within Nottinghamshire. Contact has already been made by the consultants to source the appropriate GIS constraint mapping for MSA's and existing minerals sites. The County Council would draw attention to the 'Cable Route Corridor Search Areas', as identified in Figure 3.6. and reference is drawn to the detailed response in the following sections of these comments.

### *Minerals*

As the Mineral Planning Authority, it is the responsibility of Nottinghamshire County Council to form policies and determine applications relating to mineral development. One of the key responsibilities of both the County Council but also the District and Borough Councils is to safeguard mineral resource (PPG, Paragraph 005, 2014). As minerals are a finite resource that can only be worked where they are found, the emerging Minerals Local Plan contains a policy, **SP7, Adopted Minerals Local Plan | Nottinghamshire County Council** which seeks to safeguard mineral resource from unnecessary sterilisation from non-mineral development and so establishes Mineral Safeguarding and Consultation Areas (MSA/MCA).

As a two-tier authority, the Minerals Local Plan forms part of the overall Development Framework for Bassetlaw District Council.

In terms of the specifics relating to 'Cottam Solar Farm' and the cabling options for connection to the national grid, the entire of western side of River Trent lies within a Sand and Gravel Mineral Safeguarding Area, but that given relatively small land take we do not foresee any issues.

There is an area of concern however. The northern cabling route option, the buffer zone for which, runs through or at least very close to the permitted sand and gravel site at Sturton Le Steeple quarry (1/46/06/00014/). This site is operated by TARMAC .As this site is not presently active, it may not have been picked up as part of the initial scoping exercise. NCC would draw attention to Adopted Minerals Local Plan March 2021 (**Policy MP2c**) and Policies Map Inset 4. **Adopted Minerals Local Plan | Nottinghamshire County Council**

Sturton le Steeple Quarry is an important source of sand and gravel and is a significant contributor to the resource landbank, as identified within the Adopted Nottinghamshire Minerals Local Plan March 2021.

### *Waste*

In terms of the Waste Core Strategy, there are no existing waste sites within the vicinity of the site whereby the proposed development could cause an issue in terms of safeguarding existing waste management facilities (as per Policy WCS10).

### Strategic Highways

The Environmental Impact Assessment Scoping Report confirms that a Transport Assessment (TA), Construction Traffic Management Plan (CTMP), and a Construction Environment Management Plan will form part of the Environmental Impact Assessment to be submitted in support of the proposal. The scope of the TA and CTMP will include the GCC. The CTMP should also include a chapter on construction worker travel patterns and measures to encourage travel by alternative modes to single occupancy vehicle.

The TA methodology is to be based on the DfT Guidance on Transport Assessments, 2007 (GTA) and the Institute of Environmental Management and Assessment Guidelines for the Environmental Assessment of Road Traffic, 1993. Whilst the GTA is now archived, this still would provide a methodology that complies with more recent National Planning Practice Guidance. The methodology is therefore acceptable. The Nottinghamshire Highway Authority will require the scope of the TA to consider all main junctions within Nottinghamshire that would be likely to experience an increase in traffic greater than 30 two-way peak hour movements (based on passenger car units (PCU)). This is likely to be limited to the construction of the grid connection and associated infrastructure as the proposed construction routes to the solar farm sites avoid Nottinghamshire. Where the TA addresses environmental impacts, this should be contained within a separate section to avoid confusion. It would also be helpful if the study area could be split into respective local highway authority areas.

### Planning Obligations

This application is a Screening/ Scoping Opinion therefore at this stage no detailed comments are provided regarding planning obligations. The County Council can however confirm that, should an application be submitted to the Council, it may seek planning obligations to mitigate the impact of

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the development. These contributions would be subject to negotiation and would be based on the approach set out in the County Council's Planning Obligations Strategy.

Further information about the County Councils approach to planning obligations can be found in its Planning Obligations Strategy which can be viewed at <https://www.nottinghamshire.gov.uk/planning-and-environment/general-planning/planning-obligations-strategy>

If the Council has any queries regarding planning obligations please contact William Lawrence, the County Councils Developer Contributions Practitioner on [REDACTED] [REDACTED] [REDACTED] or by email [\[REDACTED\]@nottscc.gov.uk](mailto:[REDACTED]@nottscc.gov.uk)

### Public Health

The Public Health response is outlined at Appendix 1 however if any further information is required, the Public Health team will be able to provide further advice via email [planning.publichealth@nottscc.gov.uk](mailto:planning.publichealth@nottscc.gov.uk)

### **Conclusion**

It should be noted that all comments contained above could be subject to change, as a result of ongoing negotiations between the County Council, the Local Planning Authority and the applicants. These comments are based on the information supplied and are without prejudice to any comments the County Council may make on any future planning applications submitted for this site.

Should you require any further assistance in relation to any of these matters please do not hesitate to contact me.

Yours faithfully

Nina Wilson  
Principal Planning Officer  
Nottinghamshire County Council

*This document is unsigned as it is electronically forwarded. If you require a signed copy, then please contact the sender.*

### **Appendix 1 – Public Health**

The Public Health response is outlined below however if any further information is required, the Public Health team will be able to provide further advice via email [planning.publichealth@nottscc.gov.uk](mailto:planning.publichealth@nottscc.gov.uk)

[The Nottinghamshire Health and Wellbeing Strategy](#) sets out the ambitions and priorities for the Health and Wellbeing Board with the overall vision to improve the health and wellbeing of people in Nottinghamshire:

- To give everyone a good start in Life
- To have healthy and Sustainable places

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- To enable healthier decision making
- To work together to improve healthcare services

[The Nottinghamshire Joint Strategic Needs Assessment \(JSNA\)](#) provides a picture of the current and future health needs of the population of the county. This is a useful source of information when considering the health and wellbeing of residents in planning process.

The use of [local health profile](#) report pulls together existing information in one place about localities affected by a development proposal, highlights issues that can affect health and wellbeing of residents covered within the planning process. Promoting health and wellbeing enhances resilience, employment and social outcomes. For example, consider limiting long term illness or disability as part of the development needs of a localities to ensure that it is age friendly providing good access to health and social care facilities.

[The Nottinghamshire Spatial Planning and Health Framework](#) identifies that local planning policies play a vital role in ensuring the health and wellbeing of the population and how planning matters impact on health and wellbeing locally. In addition, a health checklist is included to be used when developing local plans and assessing planning applications:

It is recommended that this checklist is completed to enable the potential positive and negative impacts of the planning application on health and wellbeing to be considered in a consistent, systematic and objective way, identifying opportunities for maximising potential health gains and minimizing harm and addressing inequalities taking account of the [wider determinants of health](#).

Obesity is a major public health challenge for Nottinghamshire. Obesity is a complex problem with many drivers, including our behaviour, environment, genetics and culture. [Nearly a quarter of children in England are obese or overweight by the time they start primary school aged five, and this rises to one third by the time they leave aged 11.](#)

To address Childhood Obesity in 10-11-year olds. It is recommended that the six themes by the TCPA document [Planning Healthy Weight Environments](#) are considered to promote a healthy lifestyle as part of this application.

In addition to [Active Design](#) Sport England 10 principles that promote activity, health and stronger communities through the way our towns and cities are built and designed to encourage activity in our everyday lives.

The six TCPA themes are:

1. Movement and access: Walking environment; cycling environment; local transport services.
2. Open spaces, recreation and play: Open spaces; natural environment; leisure and recreational spaces; play spaces.
3. Food: Food retail (including production, supply and diversity); food growing; access.
4. Neighbourhood spaces: Community and social infrastructure; public spaces.
5. Building design: Homes; other buildings.
6. Local economy: Town centres and high streets; job opportunities and access.

The Ten Principles of Active Design.

1. Activity for all
2. Walkable communities
3. Connected walking & cycling routes
4. Co-location of community facilities
5. Network of multifunctional open space
6. High quality streets & spaces
7. Appropriate infrastructure
8. Active buildings
9. Management, maintenance, monitoring & evaluation
10. Activity promotion & local champions

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Please note for major developments (over 25 dwellings) the Clinical Commissioning Groups (CCG) should be consulted for impact on primary care which may lead to a request for infrastructure support through S106/CIL.

Bassetlaw developments contact Bassetlaw Strategic Estates Group. Nottinghamshire developments email the Nottingham and Nottinghamshire Estates team [Noweccg.estates@nhs.net](mailto:Noweccg.estates@nhs.net)

## FAO Island Green Power

### Re: West Burton and Cottam Solar Projects

29 October 2021

Thank you for providing an opportunity for Nottinghamshire Wildlife Trust (NWT) to provide comments on the West Burton and Cottam Solar Projects.

NWT supports the deployment of solar arrays on built infrastructure where few if any risks are posed to the natural environment. We also support appropriately sited and managed solar farms that benefit wildlife. Where the development of a solar farm would have a significant and detrimental impact on biodiversity, however, we would oppose it. The wildlife impact of a ground-mounted solar array scheme will be largely determined by location. Where proposals are not within or close to protected areas and functionally linked land, it is unlikely that NWT will have major concerns. However, this will depend on the ecological characteristics of the site and its sensitivity to the proposed changes. In all cases, we would seek to ensure implementation of appropriate mitigation and enhancement measures (see Mitigation and Enhancements).

We note within the literature that cable routes will avoid Sites of Special Scientific Interest (SSSI). We would expect that the solar arrays, storage units and cable routes to not only avoid SSSIs but also there should be a presumption against development of sites of local biodiversity value, that is, Local Wildlife Sites (LWS). LWSs, previously known in Nottinghamshire as 'Sites of Importance for Nature Conservation' are a local, non-statutory designation, that sits below (but complements) the national suite of statutorily designated Sites of Special Scientific Interest (SSSIs). They are of substantive value for the conservation of biodiversity and are home to rare and scarce species, or represent the best surviving examples of habitats that were once widespread and typical of the Nottinghamshire landscape. Collectively, these sites form an essential ecological network and act as wildlife corridors and stepping stones, allowing species to migrate and disperse between sites. The continued existence of these sites is vital to safeguard wildlife from the pressures of development, intensive agriculture and climate change. The LWS network is comprehensive (meaning that every site which qualifies as a LWS is designated as one), whereas SSSIs are representative of the best sites in an area, such that not all sites which meet the SSSI selection criteria have been, or will be, designated as a SSSI. Because of this, a number of LWS would potentially qualify as SSSIs, meaning that LWS are best described as sites that are of at least county-level importance for their flora and/or fauna.

Proposals having a direct or indirect adverse impact on Habitats and Species of Principal Importance identified under the Natural Environment and Rural Communities Act 2006 including legally protected species, as well as Local Nature Reserves, Local Wildlife Sites or Local Geological Sites and their buffer zones and Local Biodiversity Action Plan species will be required to submit ecological information to enable an assessment of their impact, in accordance with relevant national legislation. In all cases, where the principle of development is considered appropriate the mitigation hierarchy must be applied so that: firstly harm is avoided wherever possible including consideration of other locations; secondly appropriate mitigation is provided to ensure no net loss or a net gain of priority habitat and local populations of priority species; as a last resort, compensation is delivered to offset any residual damage to biodiversity. The objective should be to protect, restore,



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Wildlife Trust

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info@nottswt.co.uk

Website:  
[www.nottinghamshirewildlife.org](http://www.nottinghamshirewildlife.org)

**President**  
Sir Andrew Buchanan Bt.

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Registered in England  
No. 748865.



enhance and provide appropriate buffers around wildlife and geological features at a local and wider landscape-scale to deliver robust ecological networks, to help deliver priorities in the Nottinghamshire Biodiversity Opportunity Mapping (BOM) model for the district of Bassetlaw.

As this is a pre-application consultation and no ecological information is available to review we can only provide general comments. We would therefore, expect a full Ecological Appraisal and Impact Assessment to be undertaken at the site which should include:

- The survey and report to be undertaken using the most recent guidance from CIEEM\* and the Bat Conservation Trust (Collins, 2016) as well as British Standard BS 42020: 2013.
- A fully comprehensive desk study and assessment with species and sites data obtained from the Local Records Centre (Nottinghamshire Biological and Geological Records Centre (NBGRC)) and County species recorders
- Outline all methodology used and results of the field survey
- Detail all relevant planning policy and legislation to the proposed scheme
- Provide results and an appropriate ecological assessment for species and habitats
- Provide an assessment and details of any anticipated effects and proposed mitigation measures
- A fully comprehensive assessment of the likely effects the proposed development may have to the LWS and any other statutory and non-statutory sites of nature conservation in the area
- Outlined the results of any protected species surveys undertaken
- Provide scheme specific enhancement measures and recommendations
- Detail further monitoring, compensation and EPS licence (if required)

\* CIEEM's Guidelines for Ecological Report Writing (2017), and CIEEM's Guidelines for Preliminary Ecological Appraisal (GPEA) (2017). It should also be noted that CIEEM's Guidelines for Ecological Impact Assessment (EclA) in the UK September 2018) is recommended to support planning applications.

If the initial field survey identifies the need for further species surveys we would also expect these surveys to be completed within the recommended survey season for that species and the results presented within a suitable format and submitted as part of any application for the proposed application site.

As well as the recommended field survey and report, overall we would expect the hedgerows within the site boundaries to be retained, protected and enhanced as part of any development proposals and the application to contain suitable site specific recommendations for providing net gains for biodiversity and to provide enhancements specific for Nottinghamshire BAP species, Section 41 Species of Principal Importance (NERC Act 2006) and habitats e.g. hedgehogs and hedgerows, as required by the National Planning Policy Framework (2019). With regard to Biodiversity Net Gain (BNG), Defra 3.0 or above should be used (there is soon to be a 3.1), but in addition to the calculations spreadsheet, we would also expect to see the completed conditions assessment and a design stage report if we are expected to provide comments <https://cieem.net/wp-content/uploads/2021/07/CIEEM-BNG-Report-and-Audit-templates2.pdf>

All new development should make provision for a minimum 10% net biodiversity gain on site, or where it can be demonstrated that for design reasons this is not practicable, off site through a financial contribution. A commuted sum equivalent to 30 years



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**President**  
*Sir Andrew Buchanan Bt.*

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No. 748865.*

maintenance will be sought to manage the biodiversity assets in the long term. Habitat gain should be maximised to meet Nature Recovery targets and contribute to 30x30. The Wildlife Trusts are calling for at least 30% of our land and sea to be connected and protected for nature's recovery by 2030.

[30 by 30 | The Wildlife Trusts](#)

### **Mitigation and enhancement**

If correctly sited (so as not to impact on sensitive sites and species) and with appropriate land / habitat management and other mitigation measures employed, the deployment of solar could be of benefit to wildlife. The following are suggestions for mitigation and enhancement measures that can be adopted by solar developers to reduce their environmental impact and enhance biodiversity on solar sites. The suggestions are taken from a more extensive document produced by the BRE National Solar Centre in conjunction with other conservation organisations that we have also provided. It is important to note, however, that mitigation and enhancement should be considered on a case-by-case basis, and not all of these measures will necessarily be relevant to any particular site.

#### **Mitigation**

- Avoid legally protected areas (SSSIs) and sites of county value (LWS).
- Retain landscape features such as hedgerows and mature trees. If removal of a section of hedge is essential, the loss should be mitigated elsewhere on the site.
- All overhead power lines, wires and supports should be designed to minimise electrocution and collision risk (for example, bird deflectors may be necessary).
- Power lines passing through areas where there are species vulnerable to collision and/or electrocution should be undergrounded unless there is adequate evidence that mitigation measures will reduce the risk to an acceptable level.
- Time construction and maintenance to avoid sensitive periods (e.g. during the bird breeding season).
- White borders and white dividing strips on PV panels may reduce attraction of aquatic invertebrates to solar panels (Horváth et al., 2010).

Vegetation will grow under the solar panels and this will require management. Grazing by sheep may be acceptable and is preferable to mowing, spraying or mulching. There may however, be more appropriate management options for wildlife of farmland that could be incorporated. In situations where grazing hasn't been adopted and vegetation clearance is required it **must** first be subject to a vantage point survey for breeding birds followed by ecological supervision. Ideally sites should be maintained without chemicals, fertilisers and pesticides. In terms of future management, it is important the current interest is maintained or enhanced in line with national and local planning policies.

#### **Enhancement**

Because panels are raised, a large proportion of a field utilised for solar farm development is still accessible for plant growth and potentially for wildlife enhancements. Furthermore, solar sites are secure sites with little disturbance from humans and machinery once construction is complete. Most sites have a lifespan of at least 20 years which is sufficient time for appropriate land management to yield real wildlife benefits.

- Biodiversity gains are possible where intensively cultivated arable or grassland is converted to extensive grassland and/or wildflower meadows between and/or beneath



**Nottinghamshire  
Wildlife Trust**

The Old Ragged School  
Brook Street  
Nottingham  
NG1 1EA  
Tel: [REDACTED]

Email:  
info@nottswt.co.uk

Website:  
[www.nottinghamshirewildlife.org](http://www.nottinghamshirewildlife.org)

**President**  
*Sir Andrew Buchanan Bt.*

*Registered Charity No.  
224168R  
A company limited by  
guarantee.  
Registered in England  
No. 748865.*



**Nottinghamshire  
Wildlife Trust**

The Old Ragged School  
Brook Street  
Nottingham  
NG1 1EA  
Tel: [REDACTED]

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info@nottswt.co.uk

Website:  
[www.nottinghamshirewildlife.org](http://www.nottinghamshirewildlife.org)

solar panels and in field margins. The best results are likely to come from sites that contain both wild flower meadows and areas of tussocky un-cropped grassland.

- Planting wild bird seed or nectar mixes could benefit birds and insects. Pollen and nectar strips provide food for pollinating insects through the summer period, and wild bird seed mixes provide food for wild birds through the winter.
- Bare cultivated strips for rare arable plants and invertebrates and rough grassland margins could also be beneficial.
- It may be possible for panels to be at a sufficient height for regular cutting or grazing to be unnecessary. Rough pasture could then develop, potentially providing nesting sites for birds.
- Boundary features such as hedgerows, ditches and field margins can provide nesting and foraging areas, as well as a means for wildlife to move between habitats.
- A variety of artificial structures can be built to provide hibernacula for reptiles and amphibians, log piles for invertebrates, and nesting or roosting boxes for birds and bats. Built structures such as control buildings can be designed to provide access to loft spaces.
- Biodiversity enhancements should be appropriate for the scale of the site and should link with existing habitats on and around the site.

Do not hesitate to contact us if you wish to discuss the above comments.

Kind regards,

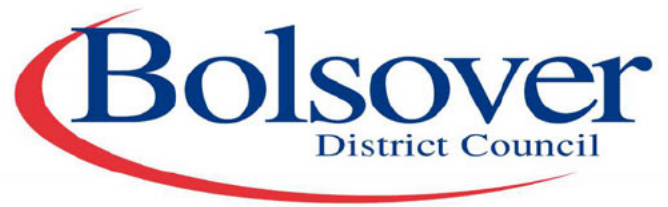
[REDACTED]

Mark Speck  
Senior Conservation Officer (North)  
Nottinghamshire Wildlife Trust  
Tel: [REDACTED]  
<https://www.nottinghamshirewildlife.org>

**President**  
*Sir Andrew Buchanan Bt.*

*Registered Charity No.  
224168R  
A company limited by  
guarantee.  
Registered in England  
No. 748865.*

**Your Ref:** EN010133-000007  
**Our Ref:** 22/00048/NCO/EN010133-000007  
**Case Officer:** Mr Peter Sawdon  
**Telephone:** [REDACTED]  
**E-mail:** [dev.control@bolsover.gov.uk](mailto:dev.control@bolsover.gov.uk)  
**Date:** 1st February 2022



Emily Park  
The Planning Inspectorate  
Environmental Services  
Central Operations  
Temple Quay House  
2 The Square  
Bristol  
BS1 6PN

The Arc  
High Street  
Clowne  
Derbyshire  
S43 4JY

**Sarah Kay MRTPI  
Planning Manager**

Dear Ms Park

[REDACTED]  
Application No: 22/00048/NCO  
Proposal: Cottam Solar Park Project  
Location: Cottam Solar Park Project Out Of Area  
Applicant:

I refer to the above consultation and am writing to confirm that Bolsover District Council has no comments to make in respect of this submission.

Yours sincerely

[REDACTED]  
Peter Sawdon  
Principal Planner



Tel [REDACTED]

Email [enquiries@bolsover.gov.uk](mailto:enquiries@bolsover.gov.uk) Web [www.bolsover.gov.uk](http://www.bolsover.gov.uk)

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**Canal &  
River Trust**

Making life better by water

Secretary of State  
The Planning Inspectorate  
Environmental Services  
Temple Quay House  
2 The Square  
Bristol  
BS1 6PN

Your Ref EN010133-000007

Our Ref IPP-153

Monday 14<sup>th</sup> February 2022

BY EMAIL ONLY [CottamSolarProject@planninginspectorate.gov.uk](mailto:CottamSolarProject@planninginspectorate.gov.uk)

Dear Sirs

**EN010133-000007 Cottam Solar Park Project - EIA Scoping Report Notification and Consultation**

Thank you for your consultation on the Environmental Impact Assessment Scoping for the above project.

We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation.

Having reviewed the location of the proposed project and the Scoping Report, we wish to make the following comments:

The Trust are Navigation Authority for the River Trent, and also have freehold landowner interests with respect to the river bed. The Trust also own and manage the Fosdyke Canal, located to the south of the project area.

The river is included within the development boundary of the Cottam Solar Park project, as it is included within the proposed cable corridor search area. Due to the nature of the need for cable connections to the Cottam Power Station site, we understand that a crossing of the river is required. The river is classified as a freight waterway, and can accommodate large craft.

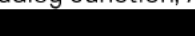
#### **Landscape and Visual Impact Assessment (LVIA)**

The Trust note that an LVIA assessment is proposed. Initial scoping details indicate that the permanent solar park elements above ground will not be visible from our waterways (e.g. figures 7.8 – 7.13).

The scoping report does not suggest that impacts from any construction compounds, or disturbance to soil for the construction of cabling between the solar farms, will be considered in the LVIA. We advise that this should be included in the assessment, especially as the cable corridors could result in a significant area of land being disturbed, which could take time to re-seed or restore. We advise that, for any construction compounds near the river corridor, the LVIA should consider views during construction phase and indicate what efforts will be made

#### **Canal & River Trust**

Fradley Junction, Alrewas, Burton-upon-Trent, Staffordshire DE13 7DN

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to minimise the visual impact during the construction works. This may require the analysis of the impact of new viewpoint locations take from the River Trent.

## **Ecology and Biodiversity**

Paragraph 8.2.50 highlights that impacts to fish species will be scoped out of the assessment as directional drilling is proposed under the River Trent, which is considered to not cause direct harm or emissions to the watercourse. We wish to highlight that directional drilling can still cause sediment discharges and problems arising from mud toxicity due to vibration below the river. As a result, we believe the impact should be **scoped in**, with consideration given to the provision of field studies into invertebrates and fish species found in the water to assess the sensitivity of these species to potential sediment movement. A bubble barrier and/or hay bales could be used to manage a portion of suspended sediment.

We note that chapter 18 highlights that impacts on the use of artificial lighting within the development will be assessed as part of other environmental topics, including the Ecology and Biodiversity chapter. We advise that temporary construction lighting, including upon the cable corridor routing, has the potential to disturb wildlife. It is mentioned in the scoping report that barn owls, short-eared owls and little owls breed on site and bats are present, and we advise that the Environmental Assessment should consider the positioning, use and lighting intensity of any construction compounds that may be required, which could impact upon these species.

## **Ground Conditions and Contamination**

We note that it is proposed to scope Ground Conditions and Contamination out of the Environmental Assessment. This is due to the identification of limited potential sources of contamination being identified in the Preliminary Risk Assessments for Sites CO1, CO2 and CO3.

We wish to highlight that the Preliminary Risk Assessment does not appear to have made judgements with regards to the potential for contamination within the cable route areas. As a buried cable is likely to involve the disturbance of soils, there is a risk that the installation works could expose the wider environment to contamination if any contaminants are present that the risk not fully remediated against.

We wish to highlight that there is potential for land used for dredging tips in proximity to the River Trent being included within the cable route search corridor, which may contain elevated levels of contamination. We advise that the applicant should ensure that the cable routing area does not include the potential for the disturbance of land currently or formerly uses as a dredging tip so as to ensure that Ground Conditions and Contamination can be scoped out of the assessment.

The Trust would be able to provide more information to the applicant so as to ensure that the cable search area does not impact with potentially contaminated land associated with dredging tips along the River Trent corridor.

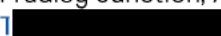
## **Impact on the use of Dredging Tips**

There is potential for the cable routing area to impact upon land used as dredging tips on the River Trent. Any cable routing across an existing dredging tip could reduce the ability of the Trust to carry out dredging activities on the River Trent, especially to enable continued navigation transport on the river.

Whilst the Scoping Report includes an assessment of the impact of the development on highway traffic, we advise that the Scoping Report is amended so that the impact of any cable routing within areas used as dredging tips can be fully considered. For example, the 'Transport and Access' chapter could be expanded so that any impact of the cable routing on the carrying out of Navigable Transport on the river is fully included; or a separate

## **Canal & River Trust**

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chapter considering the impacts on the river could be included. Alternatively, the cable routing area could be amended so as to not include existing dredging tips. The Trust would be able to provide more information to the applicant on the location of dredging tips.

### **Use of the River for Freight**

The installation of new solar farm equipment could involve the importation of significant indivisible heavy loads. The River Trent is a commercial waterway, where the transport of equipment may be possible which could help to minimise the need to utilise the Highways Network. We advise that consideration of the use of the Trent should be included within the Transport and Access chapter, so as to ensure that every possibility to reduce the impact on highways is considered.

### **Noise and Vibration**

We note that vibrational impacts are proposed to be scoped out of the EIA assessment. We wish to highlight that works to install a cable below the River Trent, as suggested in the scoping document, would need to be carefully managed to avoid any significant vibration or loading that could adversely impact the stability of the river bank above.

We advise that methodology and associated risk mitigation details should be submitted prior to the commencement of development on site. We advise that we do not believe this information need to be incorporated into the EIA. However, we would request that the need for this is addressed in any subsequent submission.

### **General Comment on the Routing of the Cables**

The submitted documents indicate that new cables will be sited underground. The Trust generally welcomes this approach, as it would help to minimise any impact on the visual appearance of our waterway corridors. It would also minimise any potential harm to navigation that could be caused through the positioning of cables above navigable channels.

Should the scheme be amended to incorporate above ground crossing or crossings of the River Trent, then we advise that the Scoping Report would need to be amended to ensure that the visual impacts of the cables would be considered and mitigated for.

Should the applicant wish to amend the scheme for an above-river crossing, we advise that consideration should be given to the use of an existing crossing, including Torksey Viaduct or existing cable crossings, so as to minimise any visual and navigational impact on the waterway.

### **Other Comments**

The applicant is advised that the Trust is not a land drainage authority and any surface water discharge to our waterways will require prior consent from the Trust. Such discharges are not granted as of right and when and if they are granted they will usually be subject to completion of a commercial agreement prior to the commencement of any development.

Landowner consent may be required for the installation of a new cable below the River Trent, due to the Trust's land ownership. The applicant is advised to contact the Trust's Utilities section at [utilitiesenquiry@canalrivertrust.org.uk](mailto:utilitiesenquiry@canalrivertrust.org.uk) for further advice.

### **Canal & River Trust**

Fradley Junction, Alrewas, Burton-upon-Trent, Staffordshire DE13 7DN

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Please note that the Canal & River Trust is a statutory undertaker which has specific duties to protect the waterways. Accordingly, it is likely that we will resist the use of compulsory purchase powers which may affect our land or undertakings. We reserve the right to seek protections under S16 of the Acquisition of Land Act 1981 should any proposals affect land which has been acquired for the purposes of our undertaking.

Accordingly, we require that the acquisition of any Trust land or rights over Trust land should be secured by agreement.

The proposals include works in close proximity to the Trust's waterways. In our capacity as landowner, we wish to advise that the applicant/landowner would likely be required to comply with the Trust's 'Code of Practice for Works affecting the Canal & River Trust'. The applicant/developer is advised to contact the Canal & River Trust's Works Engineering Team via switchboard on [REDACTED] should they have any questions or require further information upon the Code.

Yours Sincerely

**Simon Tucker MRTPI**  
Area Planner – Yorkshire and North East

[REDACTED]@canalrivertrust.org.uk  
Fradley Junction, Alrewas, Burton-upon-Trent, Staffordshire, DE13 7DN

<https://canalrivertrust.org.uk/specialist-teams/planning-and-design>

## Canal & River Trust

Fradley Junction, Alrewas, Burton-upon-Trent, Staffordshire DE13 7DN  
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CITY OF  
**Lincoln**  
COUNCIL

The Planning Inspectorate

**Directorate of Communities & Environment**  
Simon Walters MBA, ACG, MCMI  
City Hall, Beaumont Fee  
Lincoln, LN1 1DF

Telephone: [REDACTED]  
Facsimile: [REDACTED]  
Website: [www.lincoln.gov.uk](http://www.lincoln.gov.uk)

**Lana Meddings is dealing with this matter**

Direct Dial: [REDACTED]  
E-mail: [REDACTED]@lincoln.gov.uk  
Our Ref: 2022/0068/LAC  
Your Ref:  
Date: 10th February 2022

Dear Sir/Madam,

**Town and Country Planning Act 1990**

**Location: Cottam Solar Project**

**Proposal: Application by Cottam Solar Project Limited (the Applicant) for an Order granting Development Consent for the Cottam Solar Project (the Proposed Development). Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested.**

Thank you for your consultation on the above and I would confirm that the City of Lincoln Council has no objections to this proposal.

Yours faithfully

[REDACTED]

Mr K Manning  
Assistant Director - Planning

**From:** [The Coal Authority-Planning](#)  
**To:** [Cottam Solar Project](#)  
**Subject:** FW: [External] EN010133 Cottam Solar Park Project - EIA Scoping Report Notification and Consultation  
**Date:** 04 February 2022 16:36:16  
**Attachments:** [image001.png](#)  
[EN010133 Cottam Solar Park Project - Statutory consultation letter.pdf](#)

---

Dear Katie

Further to your email below I can confirm that having reviewed the site location plans (Figure 3.1 – Site Plan), the project area falls outside the coalfield area. Accordingly, the Coal Authority has no specific comments to make on this project.

In the spirit of efficiency of resources and proportionality, it will not be necessary for you to consult the Coal Authority at any future stages of the Project. This letter can be used as evidence for the legal and procedural consultation requirements.

Kind regards

Deb Roberts

 The Coal Authority

**Deb Roberts** *M.Sc. MRTPI*

**Planning & Development Manager – Planning & Development Team**

**T:** [REDACTED]

**M:** [REDACTED]

**E:** [Planningconsultation@coal.gov.uk](mailto:Planningconsultation@coal.gov.uk)

**W:** [gov.uk/government/organisations/the-coal-authority](http://gov.uk/government/organisations/the-coal-authority)

My pronouns are: she / her

How to pronounce my name (phonetic spelling): Deb Rob-erts

---

**From:** [REDACTED]  
**To:** [Cottam Solar Project](#)  
**Subject:** EN010133 - Cottam Solar Park Project  
**Date:** 23 February 2022 19:10:20

---

Hello Emily,

Thank you for consulting East Lindsey District Council on the EIA scoping opinion for the Cottram Solar Park project. Having read the submitted documentation I can confirm that this authority has no comments to make other than to query the significance attributed to grade 2 listed buildings. This section considers them to be of regional/national and hence medium significance. However, grade 2 listed buildings are listed in the national interest the same way grade 2\* and grade 1 listed buildings are and so cannot be considered to be of only regional significance. The differentiation between the levels of listing should only be considered when assessing the level of harm/magnitude of change. To do otherwise would be to exercise double counting against such buildings, which cannot be right.

Regards  
Michelle

Miss M. Walker  
Deputy Development Manager

Tel: [REDACTED]  
Email: [REDACTED]@e-lindsey.gov.uk

Website: [www.mybostonuk.com](http://www.mybostonuk.com) / [www.e-lindsey.gov.uk](http://www.e-lindsey.gov.uk)  
Facebook: [Boston Borough Council](#) / [East Lindsey District Council](#)  
Twitter: [Boston Borough Council](#) / [East Lindsey District Council](#)

East Lindsey District Council, Tedder Hall, Manby Park, Louth, LN11 8UP



served by One Team

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\*\*\*\*\*

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rights please go to our website at <https://www.e-lindsey.gov.uk/>. The information that you provide will only be used for Council purposes unless there is a legal authority to do otherwise. The contents of e-mails may have to be disclosed to a request under the Data Protection Act, the Freedom of Information Act 2000 or the Environmental Information Regulations 2004.



\*\*\*\*\*

FAO: Emily Park

**Our ref:** AN/2022/132733/01-L01

**Your ref:** EN010133-000007

By email:

[CottamSolarProject@planninginspectorate.gov.uk](mailto:CottamSolarProject@planninginspectorate.gov.uk)

**Date:** 24 February 2022

Dear Emily

**Application by Cottam Solar Project Limited (the Applicant) for an Order granting Development Consent for the Cottam Solar Project (the Proposed Development)**

Thank you for referring the above scoping consultation on the 28 January 2022.

We have reviewed the Scoping Report, prepared by Lanpro and have the following comments to make on topics that fall within our remit.

**1. Chapter 8 – Ecology and biodiversity**

- 1.1 We welcome the applicant's intention to carry out spring surveys of all water courses and ditches within the red line boundaries for water voles and otters (May 2022).
- 1.2 The applicant acknowledges the presence of water voles (paragraph 8.2.28 – 8.2.30) within the scoping report at sites **Cottam 1** and **Cottam 2**. We would add that the Northorpe Beck and its tributaries, which are in proximity to the **Cottam 3** site also have records of water vole. There could be an opportunity to improve these tributaries as a more robust water vole habitat, by providing a greater network of ditches and drains.
- 1.3 We would like to see an assessment of the potential presence of invasive species which may be present across the sites.
- 1.4 We welcome the commitment to include a Biodiversity Net Gain (BNG) assessment within the Environmental Impact Assessment (EIA).
- 1.5 The applicant is encouraged to consider if BNG proposals can incorporate the use of Natural Flood Management (NFM) techniques such as leak dams, field corner bunds, 3d buffer strips with trees, swales and grass edge to promote a slower runoff into the Northorpe beck and its tributaries. The beck feeds into the River Eau and can cause flooding issues in the village of Scotter. NFM benefits water quality as well as flood risk, alongside providing opportunities for BNG.

**Environment Agency**

Nene House (Pychley Lodge Industrial Estate),  
Pychley Lodge Road, Kettering, Northants, NN15 6JQ  
Email: [LNplanning@environment-agency.gov.uk](mailto:LNplanning@environment-agency.gov.uk)  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

Customer services line: [REDACTED]  
Calls to 03 numbers cost the same as calls to standard  
geographic numbers (i.e. numbers beginning with 01 or 02).

Cont/d..

## 2. Chapter 9 - Hydrology, flood risk and drainage

- 2.1 The comments below relate to flood risk from fluvial and tidal sources only. We do not provide advice on the risk of flooding from ground water, drainage systems, reservoirs, canals or ordinary watercourses.
- 2.2 The flood risk assessment (FRA) accompanying the EIA should demonstrate that the development is safe from flooding. The FRA should also demonstrate that the development will not increase risk elsewhere and where possible reduce flood risk overall. The supporting FRA must consider the risk from all sources of flooding and suggest mitigation as appropriate to manage the identified risks.
- 2.3 We suggest that the development would be considered as 'essential infrastructure' as classified in Annex 3 to the National Planning Policy Framework (NPPF). In this instance the essential infrastructure should be designed and constructed to:
- remain operational and safe for users in times of flood;
  - result in no net loss of floodplain storage;
  - not impede water flows and not increase flood risk elsewhere.
- 2.4 Where possible, all essential support/control infrastructure should be located in flood zone 1. Where structures are built in the floodplain, floodplain compensation should be provided. Ground levels should also not be raised and the solar arrays should allow water to pass underneath with minimal obstruction. Any fencing within the floodplain should be post and rail or post and wire with wide apertures to allow the free flow of floodwater and minimise debris collection on the fencing during flood events.
- 2.5 Sequential placement of solar panels outside of flood zones 2 and 3 would be preferred. However, should this not be possible we would recommend raising the solar panels to a minimum of the 1 in 100 year event plus climate change level with 300mm freeboard. We note the solar panels themselves can withstand up to 1 metres depth of flooding (paragraph 9.3.11), this can be explored further within the FRA.
- 2.6 If there are staff facilities/buildings planned on site they should be located within flood zone 1 where possible. If it is essential to locate them within flood zones 2 or 3 they should have a safe refuge provided above the maximum modelled flood level at the site. Access and egress to the sites during periods of flooding should also be considered within the FRA.
- 2.7 Our comments below focus on the specific areas of proposed development, based on the boundaries highlighted in Figure 1.1 – Overall Scheme Plan within the Cottam Solar Project EIA Scoping Report dated January 2022.
- 2.8 We agree that parts of the **Cottam 1** site are within flood zones 2 and 3 (paragraph 3.2.36) and that the majority is within flood zone 1. Some of the development proposed intersects with main rivers and therefore the Environmental Permitting (England and Wales) Regulations 2016 may apply. However, some exemptions to these Regulations exist and we will need to engage in more detail with the applicant regarding their status under the Electricity Act 1989 to determine if any of these apply. If it is determined that the Regulations do still apply, we will also need to discuss whether the applicant is looking to disapply these under Section 150 of the Planning Act 2008.

- 2.9 For information, the Environmental Permitting (England and Wales) Regulations 2016 apply for any proposed activities which will take place:
- in, over, under or within 8 metres of a main river (16 metres if tidal)
  - on or within 8 metres of a flood defence structure or culvert (16 metres if tidal)
  - on or within 16 metres of a sea defence
  - within 16 metres of any main river, flood defence (including a remote defence) or culvert for quarrying or excavation
  - in a flood plain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if tidal) having the potential to divert flood flows to third parties, if planning permission has not already been granted for the works.

2.10 We agree that a small portion of **Cottam 2** is within flood zone 3 (paragraph 3.2.70). **Cottom 3a and 3b** are in flood zone 1.

2.11 We note that potential impacts on water quality from construction and operation of the proposed development will be included within the scope of the EIA (Chapter 9 p102). Potential surface water impacts should be considered for all of the development sites plus the proposed cabling routes and construction compounds for cabling, in particular where these will be adjacent to or cross surface watercourses.

2.12 Water Framework Directive - We welcome the commitment in paragraph 9.3.7 to undertake a Screening and Scoping assessment to determine the potential for any non-compliance of the development with the Water Framework Directive objectives. We look forward to reviewing this in due course.

### **3. Chapter 10 - Ground conditions and contamination**

3.1 Please note that our comments in respect of this topic relate solely to the protection of the controlled water environment in the vicinity of the site.

3.2 Potential areas of contamination have been scoped out of the assessment. The potential cable route sites are located on either secondary A or B aquifer and not within a Source Protection Zone. The proposal appears to pose a low risk to controlled waters and accordingly, we are satisfied with the conclusions reached and the proposed scope of the EIA.

3.3 The applicant is advised that containment bunds should be able to hold 110% of the volume of the largest container or 25% of a combined total, whichever is the greater. Paragraph 10.4.11 correctly identifies the need for bunding, but only at a 100% volume which does not leave any scope for error.

### **4. Chapter 23 – Waste**

4.1 With regards to paragraph 23.3.3 and the potential re-use opportunities of soil from the burying of cables. The applicant should review the Code of Practice available at <https://www.claire.co.uk/projects-and-initiatives/dow-cop> which has been updated to include the direct transfer and re-use of naturally occurring soils between sites.

### **5. Detailed pre-application advice**

5.1. If the applicant wishes to obtain further more detailed advice regarding issues that fall within our remit, we will be able to do this under our discretionary planning advice service. Further details on this service are available on [our website](#), together with the [terms and conditions](#) of the service. Under this service our costs have to be recovered and we currently charge £100 per hour, per officer, plus VAT.

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me on the number below.

Yours sincerely

**Keri Monger**  
**Sustainable Places - Planning Adviser**

Direct dial [REDACTED]

Direct e-mail [REDACTED]@[environment-agency.gov.uk](mailto:[REDACTED]@environment-agency.gov.uk)





**Chair**, Fillingham Parish Meeting  
Margaret O'Grady

██████████  
Fillingham  
Lincolnshire

**Clerk**, Fillingham Parish Meeting  
Dawn Greetham

██████████  
Fillingham  
Lincolnshire

25<sup>th</sup> February 2022

Dear Ms Park,

Many thanks for the opportunity to provide feedback on the Cottam Solar Project scoping report.

The comments from Fillingham Parish Meeting are, as follows:

### **General**

Overall, the feedback from parishioners was that the consultation material was comprised of a huge quantity of technical information, filled with very detailed planning references. One response to the Parish Meeting specifically made the point that this approach "disenfranchised the average person", which must not be acceptable.

Given that the heart of the consultation is the specific question of what should be provided within the scoping of the Environmental Statement, this contrasts greatly with the significant volume of material provided. It is easy to understand why some have felt that the vast scale and nature of the consultation material has been designed to be deliberately impenetrable to the public.

Our feedback is that the developer should therefore be strongly steered by the Planning Inspectorate to provide greater clarity in its consultation communications and not seek to obfuscate the public through the use of sheer volume and technical jargon.

### **Specific additional areas to be considered**

Despite the volume of material provided, which is superficially very thorough, it deliberately seems to avoid the some of the key flaws of the scheme:

#### **Climate Change**

For a scheme such as this, which purports to be part of the solution to the environmental crisis, it is essential that the breadth and implications of the scheme are included in the scope of the Environmental Statement.

Crucially, the low load factor and intermittency of solar generation, as well as the extremely limited storage capacity of the scheme imply the need for electricity generation elsewhere; to holistically consider the scheme, the scoping should therefore include sources of alternative capacity that will be required for a **scheme of this scale**, along with their environmental impacts; For instance, should the scheme ultimately rely on the need for peaking open cycle gas or diesel reciprocating engines, or other fossil generation, the claimed benefits of the project are significantly diminished.

## **Agricultural**

Agricultural circumstances appear to be currently out of scope of the Environmental Statement, citing the matters relating to farming practice as being out of scope. It is therefore not clear that how or whether the environmental impact of displacing such a large area of agricultural land will be considered (particularly when considering West Burton and Gate Burton proposed projects, of a similar scale, within the region). At a simple level, with this, and other, such large-scale schemes, the question of where food and animal feed will be sourced from must be considered – and with it, the environmental implications of either increased food miles (e.g. through imported foods) or the potential for decreased national food resilience. While this latter point, may not appear immediately relevant, it is worth reflecting that, as a “for instance”, the recent culling of tens of thousands of pigs owing to shortages of abattoir staff, quite apart from being an animal welfare tragedy, is a catastrophic waste of resources. We should therefore not take lightly food and animal feed resilience in the same way as the country has considered its labour market in the wake of Brexit, particularly in such an uncertain world as we face following the invasion of Ukraine by Russia.

## **Land Use**

It is not clear within the framework of the consultation where efficiency of land use is to be considered, but this appears currently to be omitted. Recognising that solar will need to be a part of the solution to the energy crisis, and the surface area required to provide generation at scale, it is essential that the very most is made of every opportunity where solar can be applied efficiently, without displacing other land use, for instance, by insisting on applying solar to appropriate warehouse and domestic roofing. Such installations could eliminate or would, at least, diminish the need for proposals of the scale of the Cottam project. As a result, the scale of Environmental Impact of such schemes would be significantly reduced. For instance, the “greenfield” installation of solar farms will require concrete foundations that would not be necessary on roof-top installations. Therefore, this aspect must be included within the Environmental Statement.

Overall, we understand the need for decarbonisation, and that solar has a role to play – but it should be ensured that the developer is not able to take advantage of Government subsidies to develop at a huge scale and make a return, in the name of a net questionable environmental benefit, particularly at the expense of the character and livelihoods of the local community and its surrounding landscape.

Yours sincerely,



Margaret O’Grady, Chair, Fillingham Parish Meeting.

CEMHD Policy - Land Use Planning,  
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L20 7HS.

HSE email: [NSIP.applications@hse.gov.uk](mailto:NSIP.applications@hse.gov.uk)  
**16 February 2022**

**FAO Katie Norris**

The Planning Inspectorate  
Temple Quay House  
Temple Quay  
Bristol  
BS1 6PN  
By email only

Dear Ms Norris

**PROPOSED COTTAM SOLAR PROJECT  
PROPOSAL BY COTTAM SOLAR PROJECT LIMITED  
INFRASTRUCTURE PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017 (as  
amended) REGULATIONS 10 and 11**

Thank you for your letter of 28 January 2022 regarding the information to be provided in an environmental statement relating to the above project. HSE does not comment on EIA Scoping Reports but the following information is likely to be useful to the applicant.

**HSE's land use planning advice**

Will the proposed development fall within any of HSE's consultation distances?

According to HSE's records the proposed DCO application boundary for this Nationally Significant Infrastructure Project is within multiple consultation zones of major accident hazard sites and major accident hazard pipelines.

This is based on the current configuration as illustrated in, for example, 'Figure 1.1 Overall Scheme Plan' within the document 'Cottam Solar Project Environmental Impact Assessment Scoping Report Prepared by Lanpro January 2022'

HSE's Land Use Planning advice would be dependent on the location of areas where people may be present. When we are consulted by the Applicant with further information under Section 42 of the Planning Act 2008, we can provide full advice.

Hazardous Substance Consent

The presence of hazardous substances on, over or under land at or above set threshold quantities (Controlled Quantities) will probably require Hazardous Substances Consent (HSC) under the Planning (Hazardous Substances) Act 1990 as amended. The substances, alone or when aggregated with others

for which HSC is required, and the associated Controlled Quantities, are set out in The Planning (Hazardous Substances) Regulations 2015 as amended.

HSC would be required to store or use any of the Named Hazardous Substances or Categories of Substances at or above the controlled quantities set out in Schedule 1 of these Regulations.

Further information on HSC should be sought from the relevant Hazardous Substances Authority.

#### Consideration of risk assessments

Regulation 5(4) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 requires the assessment of significant effects to include, where relevant, the expected significant effects arising from the proposed development's vulnerability to major accidents. HSE's role on NSIPs is summarised in the following Advice Note 11 Annex on the Planning Inspectorate's website - [Annex G – The Health and Safety Executive](#). This document includes consideration of risk assessments on page 3.

#### Explosives sites

HSE's Explosives Inspectorate has no comment to make on the proposed developments

#### Electrical Safety

No comment from a planning perspective.

At this time, please send any further communication on this project directly to the HSE's designated e-mail account for NSIP applications at [nsip.applications@hse.gov.uk](mailto:nsip.applications@hse.gov.uk). We are currently unable to accept hard copies, as our offices have limited access.

Yours sincerely

AJC

Pp Allan Benson  
CEMHD4 NSIP Consultation Team

**From:** [REDACTED]  
**To:** [Cottam Solar Project](#)  
**Cc:** [Midlands ePlanning](#); [REDACTED] [@lanproservices.co.uk](#)  
**Subject:** Re .EN010133 Cottam Solar Park Project - EIA Scoping Report Notification and Consultation our ref PL00763242  
**Date:** 25 February 2022 18:45:34

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Dear PINS

**Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11  
Application by Cottam Solar Project Limited (the Applicant) for an Order granting Development Consent for the Cottam Solar Project (the Proposed Development)**

**Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested.**

Thank you for consulting us in your letter dated 28<sup>st</sup> January 2022.

We welcome the inclusion of heritage matters in the submitted scoping report and look forwards to ongoing discussions with the applicants in respect of both setting effects upon heritage assets and direct impacts upon archaeological remains.

We note the iterative approach to investigations set out in the report and will look forwards to early sight of the results of cartographic, geophysical survey, lidar and aerial photographic analysis and the results of the applicant's detailed consultation with County Archaeological Curators and Historic Environment Records and Portable Antiquities Scheme Records.

We welcome the early inclusion of a palette of mounting techniques to allow for the avoidance of some physical impacts upon buried remains. In addition to the focus upon the impact of the panel arrays, fencing substations etc we note that this and related schemes include significant cable infrastructure for connection to grid. The significance / character / importance of assets on these cable routes will need to be well understood from an early stage such that route options can effectively be weighed and risks managed. It is important both that opportunities for reduction in harm are realised and that the time required for archaeological evaluation and reporting is allowed for. Areas of heightened risk (burial sites / wet deposits / former water courses etc) should be afforded early attention as should resources requiring particular methodological approaches such for instance as battlefields or air crash.

Given the landscape scale of this and associated (nearby) projects the schemes should seek to address structures research questions about this landscape to ensure that localised archaeological interventions contribute to a whole (in terms of public value) which is more than the sum of their parts (see <https://researchframeworks.org/emherf/>).

We will discuss viewpoint locations further with the applicants and the potential for kinetic (sequential) views to add value to the assessment as the work progresses.

Without prejudice to the results of analysis (which will benefit from use of our *GPA Setting of Heritage Assets*) we take this opportunity to highlight the following sites and their setting.

- **Grade I listed Church of St Mary, Stow**  
<https://historicengland.org.uk/listing/the-list/list-entry/1146624>
- **Scheduled Site of college and Benedictine abbey of St Mary, Stow**  
<https://historicengland.org.uk/listing/the-list/list-entry/1012976>
- **Grade I listed Church of St Laurence, Corringham**  
<https://historicengland.org.uk/listing/the-list/list-entry/1064162>
- **Scheduled Medieval Settlement and Moated Site, Coates**  
<https://historicengland.org.uk/listing/the-list/list-entry/1016979>
- **Grade I listed Church of St Edith, Coates by Stow**  
<https://historicengland.org.uk/listing/the-list/list-entry/1146742>
- **Scheduled Medieval Settlement, Thorpe**  
<https://historicengland.org.uk/listing/the-list/list-entry/1016978>
- **Grade II\* Church of Andrew, Fillingham and Conservation Area**  
<https://historicengland.org.uk/listing/the-list/list-entry/1359847>
- **Grade I listed Fillingham Castle**  
<https://historicengland.org.uk/listing/the-list/list-entry/1166045> and **GII Registered Park** <https://historicengland.org.uk/listing/the-list/list-entry/1000977>

We look forwards to further detailed discussion with the applicants.

Yours sincerely  
Tim Allen

Tim Allen MA FSA  
Development Advice Team Leader (North)

Midlands Region  
Historic England  
The Foundry, 82 Granville Street, Birmingham B1 2LH

Direct Line [REDACTED]  
<http://www.historicengland.org.uk/> | [@HistoricEngland](#)



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25 February 2022

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County Offices  
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Dear Sir/Madam

**Proposal - The Planning Inspectorate Scoping Opinion under the Infrastructure Planning Regulations 2017 for Order Granting Development Consent Order for Cottam Solar Energy Park**

Thank you for your letter and documents regarding this project received in February 2022.

The Council have reviewed the information provided and have the following comments to make.

**Alternatives**

In this section consideration needs to be given to looking at the benefits of keeping the land, subject of this project, in agricultural use and the impact on food production in the region.

Schedule 4 (2) of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 states that an ES must include 'a description of the reasonable alternatives for example, 'in terms of development design, technology, location, size and scale studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects'.

In the context of agricultural land impacts 'location', 'size' and 'scale' are key factors which, in the Council's opinion, suggest that applying a relatively narrow search area (reflecting the equivalent cable connection distance ) for the assessment of alternative sites is likely to be significantly narrow, skewing the site selection process artificially in favour of the application site.

A county-level alternative assessment area should be applied which as a minimum should consider scope for connection into the National Grid at the locations proposed by the registered NSIP solar projects, and with specific consideration of agricultural land impacts. Without prejudice to that higher level alternative assessment, the regulations also require an indication of the main reasons for selecting the chosen option. In this case this this should

include alternative site layout/s (and reduced MW generating capacity as necessary) to reflect the location of known Best and Most Versatile (BMV) land within the site.

### **Highways and Lead Local Flood Authority**

The proposed scope for Transport and Access is acceptable to the Council as the Highway Authority.

Similarly, the proposed scope for Hydrology - Flood Risk Assessment and Drainage is acceptable to the Council as Lead Local Flood Authority.

### **Cumulative Impacts**

Consideration needs to be given to the other NSIP schemes in the area for solar farms (West Burton, Gate Burton and Heckington in North Kesteven). Whilst it is accepted that these schemes are also at the pre-application stage and full details are not yet available, indicative plans have been produced and therefore the ES should include commentary on the cumulative impacts on the topics included in the ES from the other solar schemes in the area particularly with regard to loss of agricultural land.

### **Climate Change**

- The potential for a microclimate to be created by battery storage?
- What is the energy consumption and associated carbon emissions of the battery system?
- What are the carbon emissions associated with the solar PV panels themselves – separated into manufacture, operation, and maintenance (and which panels are to be used – poly, multi, single crystal silicon)? Is the embedded carbon associated with the panel manufacture included in any payback of carbon (bearing in mind that the panels are likely to be imported)?
- Power losses and associated carbon footprint of connecting cables to the grid need estimating.
- With regard to greenhouse Gas Emissions this should be directly compared to the number of years it will take for development to be carbon neutral. However, to get a true reflective understanding of the benefits/harm to the environment it should be compared to a least one fossil fuel, nuclear and at least one alternative renewable energy. It is considered that by doing this the clear environmental benefits should be highlighted and allow for careful consideration against the impacts of the development.

### **Landscape and Visual Assessment**

Overall, expect that the assessment of potential Landscape and Visual matters and evolving proposals relating to the Cottam Solar Project, as a Nationally Significant Infrastructure Project (NSIP), follow an iterative process of engagement and consultation to ensure the following are not fixed at this stage and are discussed, developed and agreed at subsequent technical meetings:

- Landscape and Visual Impact Assessment (LVIA) Methodology;
- ZTV parameters;
- Study Area extents (distance);
- Viewpoint quantity and locations;
- Photomontage/Accurate Visual Representations (AVRs):



- Quantity and location;
- Phase depiction;
- AVR Type and Level.
- Mitigation Measures/Landscape Scheme/Site Layout; and
- The extent as to which a Residential Visual Amenity Assessment (RVAA) should be considered (based on the Landscape Institute TGN 2/19) if there are residential properties with receptors likely to experience significant effects to their visual amenity.

Also expect the production of the Landscape and Visual chapter of the Environmental Statement (ES), which would be in the form of a Landscape and Visual Impact Assessment (LVIA), and any supporting information (such as plans or figures) reflect current best practice and guidance from, as a minimum, the following sources:

- ‘*Guidelines for Landscape and Visual Impact Assessment*’, (GLVIA3), April 2013 by the Landscape Institute (LI) and Institute of Environmental Management and Assessment (IEMA);
- ‘*An Approach to Landscape Character Assessment*’, Natural England (2014);
- ‘*Technical Guidance Note (TGN) 06/19 Visual Representation of Development Proposals*’, 17th September 2019 by the Landscape Institute (LI);
- ‘*Technical Guidance Note (TGN) 1/20 Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs)*’, 10th January 2020 by the Landscape Institute (LI) ; and
- ‘*Technical Guidance Note (TGN) 2/21 Assessing landscape value outside national designations*’, May 2021 by the Landscape Institute (LI).

At this initial stage, the content and level of information provided by the developer within *Chapter 7* (Landscape and Visual), and *Appendix 7 (Figures 7.1 to 7.13)*, are generally considered satisfactory, however, as stated previously, the Council would expect to discuss this content and approach as part of the iterative process, and the following should be considered in the evolving assessment and layout:

### **Viewpoints**

The sixty seven proposed viewpoints appear to be appropriate, however the final locations are to be agreed with the Council.

### **Photomontages**

To gain an understanding of the visibility of the development and how the panels and infrastructure would appear in the surrounding landscape, Photomontages/Accurate Visual Representations (AVRs) should be produced. The number and location of the agreed viewpoints to be developed as Photomontages/AVRs should be agreed with the Council and produced in accordance with *TGN 06/19 Visual Representation of Development Proposals*. At this stage, it is deemed appropriate that these should be produced to illustrate the proposals at different phases: Existing Situation (baseline), Operational (year 1) and Residual with planting established (10 to 15 years). The Photomontage/AVR Level and Type is to be discussed and agreed.

### **Methodology**

As stated previously, the LVIA should be carried out in accordance with the GLVIA3 and undertaken by suitably qualified personnel. The methodology provided at *Section 7.4* is typical of those used for ES Chapters and standalone LVIA's where potential significant effects can be considered and reflects the guidance in GLVIA3. We would request that the most up to date technical guidance also be used, such as the recently published LI TGN 2/21 *Assessing landscape value outside national designations*.

One observation on the *Low* category of *Table 7.1 Sensitivity of Landscape Receptors* in regards to power lines: The presence of power lines does not necessarily create *low* landscape sensitivity as there are examples of valuable, high sensitivity landscapes that are intercepted by power lines at local, national and international level, due to their landscape characteristics and attributes.

### **Scope of the Study Area:**

It is acknowledged that a Study Area that covers 5km has been allowed for initially, scoping out views and landscapes beyond 5km. The ZTVs provided (*Figures 7.8 to 7.13*) indicated that the site may be visible from beyond 2km, however only six viewpoints have been included beyond 2km, which would need to be reviewed, along with any other long distance views, at the next stages of the project. The LVIA should also provide a justification for the extent of the study area, which, as indicated within *para. 7.1.5*, would be further refined as part of the iterative process.

The ZTV methodology utilises a proposed height of 4.5m, however does not contain details of the dimensions of all structures which will form part of the development, such as battery storage. Consequently, the ZTV may be unrepresentative of the full extent of visibility and the ZTV should clearly demonstrate the full extent of the proposed development stating what has been included and the ultimate height/scale.

5km provides a reasonable landscape study area at this stage and would include more sensitive receptors in the area such as Laughton AGLV, Ridge AGLV, and Gainsborough AGLV, but again the LVIA should also provide a justification for the extent of the study area.

### **Landscape**

Published landscape character areas have been identified, however to align with GLVIA3 the LVIA should include an assessment of landscape effects at a range of scales and include a finer grain landscape assessment that includes the Site and immediate area and that also considers individual landscape elements such as trees and hedgerows, woodlands, ponds/water features, or historic landscape features.

### **Visual**

The visual assessment should take account of the 'worst case scenario' in terms of winter views, and effects associated with landscape mitigation at the Operational Phase (year 1), Residual Phase with planting having established (10 to 15 years), and at the Decommissioning Phase.

The LVIA should ensure all elements associated with the development are considered and assessed, such as battery storage and boundary fencing, which may be more visible than panels due to height and mass.

The visual assessment should include for visual receptors, and not just an assessment of any agreed viewpoints. It should also clearly cross reference viewpoints to associated receptors.

### **Cumulative impacts**

Cumulative Landscape and Visual Impacts should be assessed, particularly in regards to the West Burton Solar Project and Gate Burton Energy Park.

### **Mitigation and Layout**

As this is an iterative process, at this stage it is not relevant to comment on any potential mitigation or layout of the development. However, best practice guidance, relevant published landscape character assessment's District and County Council Policy and Guidance shall be referred to and implemented as appropriate. The Council also expect the landscape and planting scheme is coordinated with other relevant disciplines, such as ecology or civils (e.g. SuDS features), to improve the value of the landscape and reflect appropriate local and regional aims and objectives. Any Landscape Scheme and associated Outline Management Plan should accompany the ES.

### **Minerals and Waste**

The proposed development is partially located within a Mineral Safeguarding Area (MSA) for Sand and Gravel and is therefore subject to Policy M11 (Safeguarding of Mineral Resources) of the Lincolnshire Minerals and Waste Local Plan: Core Strategy and Development Management Policies - adopted June 2016. The Core Strategy is available to download from the County Council's website: [www.lincolnshire.gov.uk](http://www.lincolnshire.gov.uk).

Within an MSA, except for the exemptions set out in Policy M11, applications for non-minerals development should be accompanied by a Minerals Assessment.

A Minerals Assessment should provide an appropriate assessment of the mineral resource, its potential for use in the forthcoming development and an assessment of whether it is feasible and viable to extract the mineral resource ahead of development to prevent unnecessary sterilisation. Where prior extraction of some or all of the mineral can be undertaken, the assessment should also include an explanation of how this will be carried out as part of the overall scheme. The assessment should also assess the potential for proximal sterilisation of mineral resources in adjacent land.

Where mineral resources would be sterilised by a proposal, Policy M11 sets out the tests that need to be met in order to enable planning permission to be granted.

When reviewing the submitted scoping report, it is noted that the Minerals and Waste Local Plan is identified as relevant local policy in para 1.2.10. The report also notes in para 15.4.3 that the ES will include details of land designated for Mineral Safeguarding in its brief section on 'other environmental topics', however, the proposed section in question (on ground conditions) appears to be geared towards pollution and contamination, and does not acknowledge the policy issue of the need to consider the potential sterilisation of safeguarded mineral resources.

The potential sterilisation of mineral resources should therefore be 'scoped in' to the EIA and addressed through a minerals assessment as part of the ES. We would expect this to be proportionate to the proposals. We acknowledge for example that the vast majority of the PV site itself does not lie within the MSA, and the potential sterilisation of mineral resources may therefore be very limited.

The proposed grid connection corridors, however, require more detailed consideration. All of the connection options pass through the sand and gravel MSA situated between the A156 and River Trent. Whilst the final footprint of the grid connection may be limited, by dissecting the MSA it could introduce a constraint to the potential for any future extraction of the sand and gravel resources in the surrounding land. The minerals assessment as part of the ES should therefore include consideration of this matter and it should be given due consideration when determining the final route/method of the grid connection.

### **Socioeconomic**

From a growth perspective, the range of the scoping document appears reasonable, and will be able to comment in further detail as the exercise progresses.

### **Historic Environment**

Are disappointed to note that the applicant has not engaged with this office prior to this undertaking geophysical survey work, which may not meet the standards and quality control requirements expected.

As part of the Environmental Impact Assessment process, a scoping report should set out the proposed approach regarding Cultural Heritage, and we are concerned by the submitted suite of documents with respect to the Archaeology and Built Environment.

An approach is needed with sufficient evaluation in order to understand the archaeological potential and to inform a reasonable appropriate mitigation strategy which will need to be submitted with the DCO application. The full suite of available desk-based information needs to be competently assessed including all available records, air photos, LiDAR and local sources. This understanding and the geophysical survey results then inform a robust programme of trial trenching to provide evidence for the site-specific archaeological potential of the development.

### **Proposed methodology**

Disappointed that the presumption that agricultural techniques have diminished the archaeological potential of these sites without investigation or intrusive evaluation. This is an erroneous approach which is ill-informed: Lincolnshire is an agricultural county with a wealth of archaeological sites some of which are regionally, nationally and even internationally significant, and the vast majority of sites in this county are in arable land.

Given the above, the general proposed methodology is currently insufficient and there is insufficient baseline evidence to support it. Below are some examples of the statements that we cannot agree.

Examples from the Environmental Impact Assessment Scoping Report

Section 12.2.17 states that 'Despite the lack or limited nature of previously recorded evidence for prehistoric and Roman period activity, the results of the geophysical survey have identified concentrations of anomalies that could represent settlements and enclosures of a late prehistoric or Roman period date.' The dismissive tone is unhelpful: this is the point of evaluation. The lack of site-specific information is an indication of limited investigation rather than limited archaeological potential. This is why sufficient levels of phased evaluation is necessary as the purpose of each stage is to identify previously unknown archaeology.

Section 12.2.18 goes on to say that even if archaeological remains of prehistoric or Roman periods are present in the Site 'there is no evidence however to suggest the presence of any remains of a greater than local significance' There are several issues with this. First, such a statement is entirely unfounded until it is informed by trial trenching. Secondly, is this statement regarding assumed diminished significance, a theme throughout the document, an indication that locally significant archaeology which is impacted by the development should not be dealt with? And finally, as no fieldwork has been completed this seems to be based entirely upon a limited selection of desk-based sources and a partial ongoing geophysical survey. This is obviously entirely insufficient grounds as a basis for competent assessment of the archaeological potential.

The Methodology for further Evaluation and Mitigation states that 'where it is identified that there may be potential further archaeological evaluation will be taken' (Section 12.3.13) This is unacceptable. This would only give us more information on what is already known. The absence of information does not mean an absence of archaeology. The full extent of the proposed impact zone needs to be evaluated with geophysics informing a programme of trial trenching and those results will inform the archaeological mitigation. This cannot be done until the location, depth, extent and importance of surviving archaeology has been determined through a programme of effective evaluation.

We also disagree with the proposed scoping out of direct impacts upon designated heritage assets (12.4.2) as the potential impacts have not been sufficiently assessed.

#### Examples from Appendices to Chapter 12: Archaeology

Section 12.6.8 says there is 'some limited potential for the survival or previously unrecorded remains dating to the Early Anglo-Saxon period activity. As well as this, it is possible Middle or Late Anglo-Saxon remains could survive in the vicinity of existing settlements.' Despite admitting there is potential however, the section concludes that 'Despite this, the Parcels forming the Cottam 1 study site are likely to have remained in primarily agricultural use through the early medieval period.'). This statement has no evidential basis until it is informed by trial trenching.

Section 12.6.37 says that 'Although there is evidence that the medieval settlement of Normanby by Stow extended into Fields 1 and 2 of Parcel F and that the settlement at Thorpe in the Fallows could have occupied areas within the southern edge of Parcel D, the majority of the Cottam 1 study site is likely to have remained in agricultural use throughout the medieval period' The section concludes, as so many have, that any potential archaeological features 'are most likely to relate to agricultural activity and would be considered to be of negligible significance.' This summing up is used throughout the study areas, and these conclusions are based on assumptions with no evidential basis.

Section 12.6.84 says the Romano-British settlement immediately NE of the study site could have pre-Roman origins and 'there may be potential for prehistoric and Roman period activity' to extend into the study site. So far so good, however, the section then goes on: 'at the time of writing however, geophysical survey had been limited to Field J6 of Parcel 3b, and no potential archaeological anomalies recorded(sic). It is also likely that the construction of the former WWII runways and any related infrastructure built to serve RAF Blyton will have impacted or destroyed any earlier remains within their footprint' This is a fallacy, archaeological levels would survive below surface activity such as runways. There is no evidence to support this statement and intrusive evaluation is required.

Section 12.6.95 states that 'It is possible that sub-surface remains could survive within the study site but it is considered that any such remains would be of no greater than local significance.'

The reductive tone and approach to the archaeological potential throughout the documentation is disappointing, with assumptions put forward which diminish the potential of unevaluated areas and even, as seen above in Section 12.6.8, diminish the potential of known archaeology. This is unacceptable and an unhelpful approach to archaeological assessment the purpose of which is to lead through a phased programme of sufficient reasonable evaluation to arrive at a mitigation strategy which is effective and fit for purpose. It needs to inform the work programme and budget in a realistic way, there are significant scheduling and financial implications for a development which encounters unexpected archaeology during the work programme.

### Requirements for Environmental Statement

The ES will require further desk-based research, non-intrusive surveys, and intrusive field evaluation for the full extent of proposed impact areas. The results should be used to minimise the impact on the historic environment through informing the project design and an appropriate programme of archaeological mitigation secured in the Development Consent Order (DCO).

Regarding desk-based sources, the Environmental Statement will require:

Full LiDAR coverage and assessment; full aerial photo coverage and assessment; archaeological reports; relevant documents from the Record Office covering each site; and the Portable Antiquities Scheme (PAS) data must also be consulted.

Map regression should include all available maps to provide a reasonable understanding of the development and time depth of the sites.

The HER search should be for at least 5km for visual impact on designated assets.

Regarding guidance documents, the Lincolnshire Archaeology Handbook (2019) should be included which lays out the requirements for undertaking archaeological work in the County. EIA regulations should also be included in the Reference section and in the Legislation, Policy and Guidance section, and should be used as the basis for the EIA Environmental Statement.

### Full impact zone

We note the final cable route has yet to be determined. The full potential impact zone including all proposed route corridors as well as the red line boundary area will need to undertake sufficient evaluation to allow for a programme of suitable mitigation.

The full potential impact zone will require geophysical survey to identify site-specific archaeological potential and to inform a programme of archaeological trial trenching and subsequent mitigation. The full extent of the proposed impact area including the connector route corridors must be included in the evaluation process as archaeological impacts and subsequent mitigation have the potential for significant financial and scheduling impacts.

Sufficient evaluation is essential in informing the selection process and in ensuring the subsequent design and work programme is devised with an understanding of the level of archaeological work which may be required before and during the construction phase. Pre-determination evaluation of the cable connection corridors can be very useful with informing a decision on the most cost effective and viable route.

### Geophysical Survey

It is apparent from the documents that geophysical survey has already commenced. As there has been no engagement with us and no Written Scheme of Investigation has been submitted

we also have concerns about the methodology, practice and extent of the work which is currently being undertaken and what quality control mechanisms have been put in place.

Regardless of the approach to geophysical survey already employed, would expect the following as a minimum: a single Written Scheme of Investigation for the geophysical survey should be prepared that all contractors adhere to. This must include appropriate quality and control measures to ensure consistency of data recovery across the site. The proposed cable route(s) must be included in the survey. Where multiple contractors are used, separate reports for each contractor should be supplied in full with an overarching report presenting the combined results as this will be the basis for the subsequent evaluation trenching.

### Evaluation Trenching

Trenching results are essential for effective risk management and to inform programme scheduling and budget management. Failing to do so could lead to unnecessary destruction of heritage assets, potential programme delays and excessive cost increases that could otherwise be avoided. A programme of trial trenching is required to inform a robust mitigation strategy which will need to be agreed by the time the Environmental Statement is produced and submitted with the Development Consent Order (DCO) application.

### Settings Assessment

Regarding a competent Settings Assessment, the application site may affect the setting of several Scheduled Monuments as well as a large number of designated and non-designated heritage assets. The Settings Assessment/Heritage Impact Assessment needs to begin from an understanding of the significance of each of those assets in order to assess the potential impact of the development on them and put forward any potential benefit or mitigation of proposed negative impact.

In conclusion, the Environmental Impact Assessment (EIA) will require desk-based research, non-intrusive surveys, and intrusive field evaluation for the full extent of proposed impact. The results should be used to minimise the impact on the historic environment through informing the project design and an appropriate programme of archaeological mitigation. The provision of sufficient baseline information to identify and assess the impact on known and potential heritage assets is required by Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (Regulation 5 (2d)), National Planning Statement Policy EN1 (Section 5.8), and the National Planning Policy Framework.

The EIA will need to contain sufficient information on the archaeological potential and must include evidential information on the depth, extent and significance of the archaeological deposits which will be impacted by the development. The results will inform a fit for purpose mitigation strategy which will identify what measures are to be taken to minimise or adequately record the impact of the proposal on archaeological remains.

This is in accordance with The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 states "The EIA must identify, describe and assess in an appropriate manner the direct and indirect significant impacts of the proposed development on material assets, cultural heritage and the landscape." (Regulation 5 (2d))

### Other Environmental Topics

- Include details of crime prevention and in respect of major accidents to include sabotage criminal activity is assessed as pre-planned damage to the scheme could leave it vulnerable to a major accident;
- Glint and glare that should be included and this should focus on visual impact, highway safety and aviation safety.

The Council will continue to engage with this project and therefore any further queries, please do not hesitate to get in contact.

Yours faithfully

*Neil McBride*

**Head of Planning**





# Ministry of Defence

Emily Park  
The Planning Inspectorate  
Environmental Services  
Central Operations  
Temple Quay House  
2 The Square  
Bristol, BS1 6PN

Planning Inspectorate Reference-: EN010133-000007  
DIO Reference: 10054191

# Defence Infrastructure Organisation

Safeguarding Department  
Statutory & Offshore  
Defence Infrastructure Organisation Head Office  
St George's House  
DMS Whittington  
Lichfield  
Staffordshire  
WS14 9PY

Tel: [REDACTED]

E-mail: [DIO-safeguarding-statutory@mod.gov.uk](mailto:DIO-safeguarding-statutory@mod.gov.uk)

[www.mod.uk/DIO](http://www.mod.uk/DIO)

23 February 2022

Dear Emily,

## **MOD Safeguarding-RAF Scampton**

**Proposal:** Scoping application by Cottam Solar Project Limited (the Applicant) for an Order granting Development Consent for the Cottam Solar Project (the Proposed Development)

**Location:** Approximately 6.5km south east and 4km north east of Gainsborough

Thank you for consulting Ministry of Defence on the above proposed development. Consultation correspondence was received by this office on 28 January 2022.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the MOD as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System.

The applicant is seeking a scoping opinion for the Cottam Solar Project. The scheme consists of three electricity generating stations each with a capacity of over 50MW comprising of ground mounted solar arrays and associated development comprising of energy storage, grid connection infrastructure and other infrastructure integral to the construction, operations, and maintenance of the scheme. The proposed scheme comprises of a number of land parcels which are grouped and designated as Cottam 1,2 & 3.

The land parcels that form Cottam 1 are located approximately 4.89km from the centre of the aerodrome at RAF Scampton and occupies the statutory aerodrome height and technical and birdstrike safeguarding zones surrounding the aerodrome.

## **Aerodrome height and technical safeguarding zones**

The proposed development site occupies the statutory height and technical safeguarding zones that ensure air traffic approaches and the line of sight of navigational aids and transmitters/receivers are not impeded. The airspace above and around aerodromes is safeguarded to maintain an assured, obstacle free environment for aircraft manoeuvre.

### **Birdstrike safeguarding zone**

Within this zone, the principal concern of the MOD is the creation of new habitats may attract and support populations of large and/ flocking birds close to the aerodrome, especially during the construction phase of this development.

The MOD would like to be consulted at the next stage of this application when further details are available, ideally these should include;

- grid references (BNG) for the Rochdale envelope for all three groups of land parcels that form Cottam 1,2 and 3
- details of landscaping i.e. a schedule of the type of planting proposed (species and locations)
- details of mitigation measures designed to manage the potential for the scheme to attract those large and/ or flocking bird species during both construction and operational phases
- details of any drainage proposed
- given the proximity of the application sites to operational aerodromes a glint and glare assessment should also be submitted.

I trust this adequately explains our position on this matter

Yours sincerely

Kalie Jagpal  
Assistant Safeguarding Manager

## Land and Acquisitions

Anne Holdsworth  
DCO Liaison Officer  
UK Land & Property  
[REDACTED]@nationalgrid.com  
Direct tel: + [REDACTED]

SUBMITTED ELECTRONICALLY: [www.nationalgrid.com](http://www.nationalgrid.com)  
[CottamSolarProject@planninginspectorate.gov.uk](mailto:CottamSolarProject@planninginspectorate.gov.uk)

21 February 2022

Dear Sir/Madam

### **EN010133-000007 SCOPING CONSULTATION AND NOTIFICATION FOR THE PROPOSED COTTAM SOLAR PROJECT (THE PROPOSED DEVELOPMENT)**

This is a response on behalf of National Grid Electricity Transmission PLC (NGET) and National Grid Gas PLC (NGG).

I refer to your letter dated 28<sup>th</sup> January 2022 in relation to the above proposed application and the Scoping Notification and Consultation. I would like to make the following comments:

#### National Grid infrastructure within / in close proximity to the order boundary

##### **Electricity Transmission Infrastructure**

National Grid Electricity Transmission has high voltage electricity overhead transmission lines and a high voltage substation within the scoping area. The overhead lines and substation form an essential part of the electricity transmission network in England and Wales.

##### Overhead Lines

- 4VE 400kV Cottam – Keadby 1  
Cottam – Keadby 2  
Cottam – Grendon  
Cottam – Staythorpe 2
- ZDA 400kV Cottam – West Burton  
High Marnham – West Burton  
Cottam – Staythorpe 1
- 4VK 400kV Cottam – Eaton Socon – Wymondley 2
- 4ZM 400kV Bicker Fen - Spalding North - West Burton  
Bicker Fen - Walpole - West Burton

## Substation

- Cottam 400kV Substation
- Associated cables
- Associated fibre cable

Three plans showing the NGET Infrastructure are attached to this submission.

## **Gas Transmission Infrastructure:**

National Grid Gas has **no gas transmission apparatus** located within or in close proximity to the scoping area.

## **Specific Comments – Electricity Infrastructure:**

- National Grid's Overhead Line/s is protected by a Deed of Easement/Wayleave Agreement which provides full right of access to retain, maintain, repair and inspect our asset
- Statutory electrical safety clearances must be maintained at all times. Any proposed buildings must not be closer than 5.3m to the lowest conductor. National Grid recommends that no permanent structures are built directly beneath overhead lines. These distances are set out in EN 43 – 8 Technical Specification for “overhead line clearances Issue 3 (2004)
- If any changes in ground levels are proposed either beneath or in close proximity to our existing overhead lines then this would serve to reduce the safety clearances for such overhead lines. Safe clearances for existing overhead lines must be maintained in all circumstances.
- The relevant guidance in relation to working safely near to existing overhead lines is contained within the Health and Safety Executive's ([www.hse.gov.uk](http://www.hse.gov.uk)) Guidance Note GS 6 “Avoidance of Danger from Overhead Electric Lines” and all relevant site staff should make sure that they are both aware of and understand this guidance.
- Plant, machinery, equipment, buildings or scaffolding should not encroach within 5.3 metres of any of our high voltage conductors when those conductors are under their worse conditions of maximum “sag” and “swing” and overhead line profile (maximum “sag” and “swing”) drawings should be obtained using the contact details above.
- If a landscaping scheme is proposed as part of the proposal, we request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances.
- Drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations or “pillars of support” of any existing tower. These foundations always extend beyond the base area of the existing tower and foundation (“pillar of support”) drawings can be obtained using the contact details above.
- National Grid Electricity Transmission high voltage underground cables are protected by a Deed of Grant; Easement; Wayleave Agreement or the provisions of the New Roads and Street Works Act. These provisions provide National Grid full right of access to retain, maintain,

repair and inspect our assets. Hence we require that no permanent / temporary structures are to be built over our cables or within the easement strip. Any such proposals should be discussed and agreed with National Grid prior to any works taking place.

- Ground levels above our cables must not be altered in any way. Any alterations to the depth of our cables will subsequently alter the rating of the circuit and can compromise the reliability, efficiency and safety of our electricity network and requires consultation with National Grid prior to any such changes in both level and construction being implemented.

## **Further Advice**

**National Grid requests to be consulted at the earliest stages to ensure that the most appropriate protective provisions are included within the DCO application to safeguard the integrity of our apparatus and to remove the requirement for objection. All further consultations should be sent to the following email address:**

**[box.landandacquisitions@nationalgrid.com](mailto:box.landandacquisitions@nationalgrid.com)**

**We would request that the potential impact of the proposed scheme on National Grid's existing assets as set out above and including any proposed diversions is considered in any subsequent reports, including in the Environmental Statement, and as part of any subsequent application.**

**Where any diversion of apparatus may be required to facilitate a scheme, National Grid is unable to give any certainty with the regard to diversions until such time as adequate conceptual design studies have been undertaken by National Grid. Further information relating to this can be obtained by contacting the email address below.**

**Where the promoter intends to acquire land, extinguish rights, or interfere with any of National Grid apparatus protective provisions will be required in a form acceptable to it to be included within the DCO.**

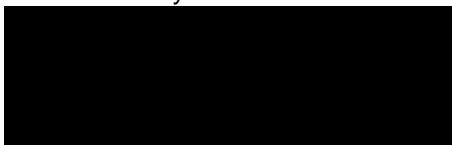
In order to respond at the earliest opportunity National Grid will require the following:

- Draft DCO including the Book of Reference and relevant Land Plans;
- Shape Files or CAD Files for the order limits.

I hope the above information is useful. If you require any further information please do not hesitate to contact me.

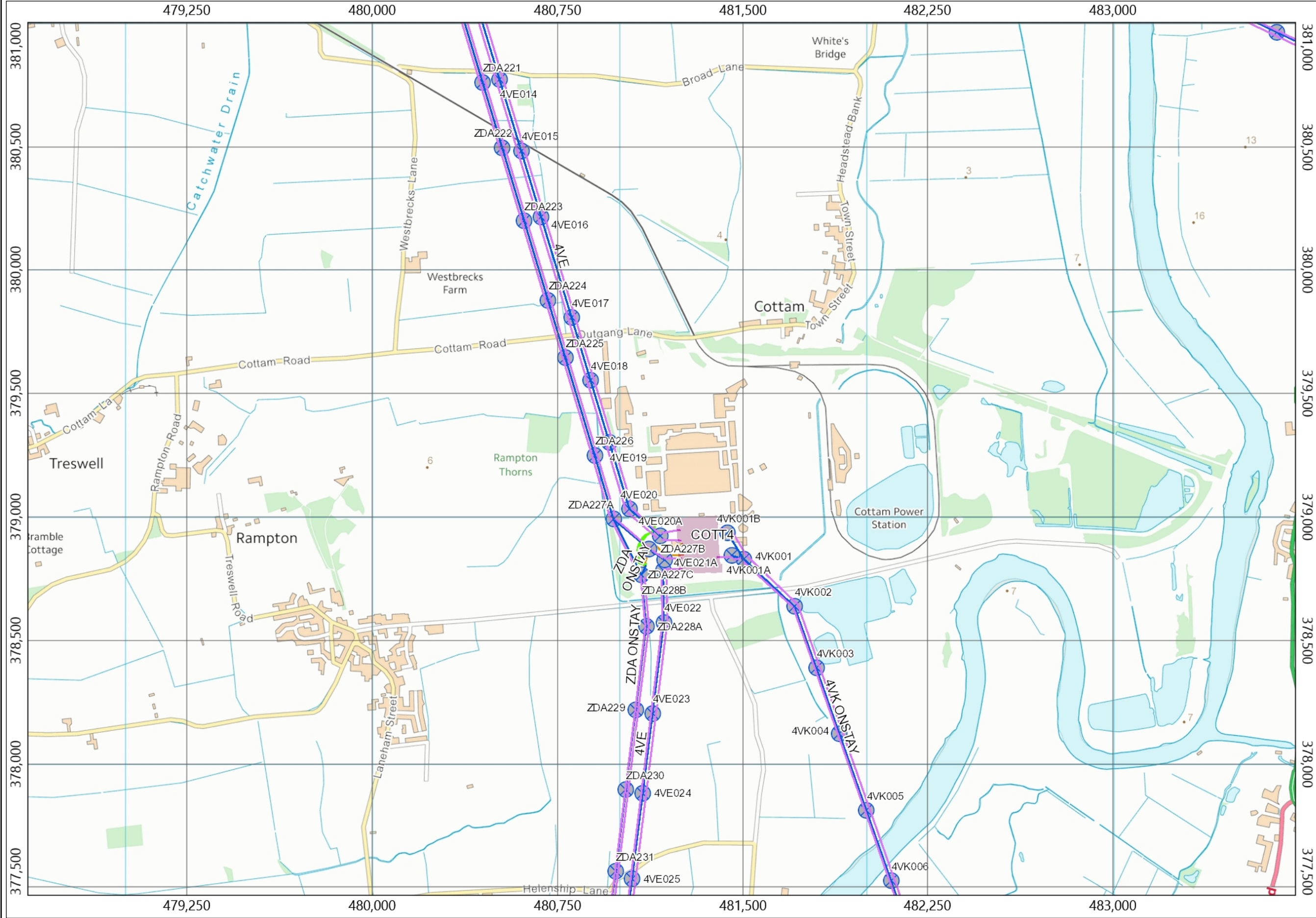
The information in this letter is provided notwithstanding any discussions taking place in relation to connections with electricity services.

Yours faithfully



**Anne Holdsworth  
DCO Liaison Officer, Land Rights and Acquisitions**





**Legend:**

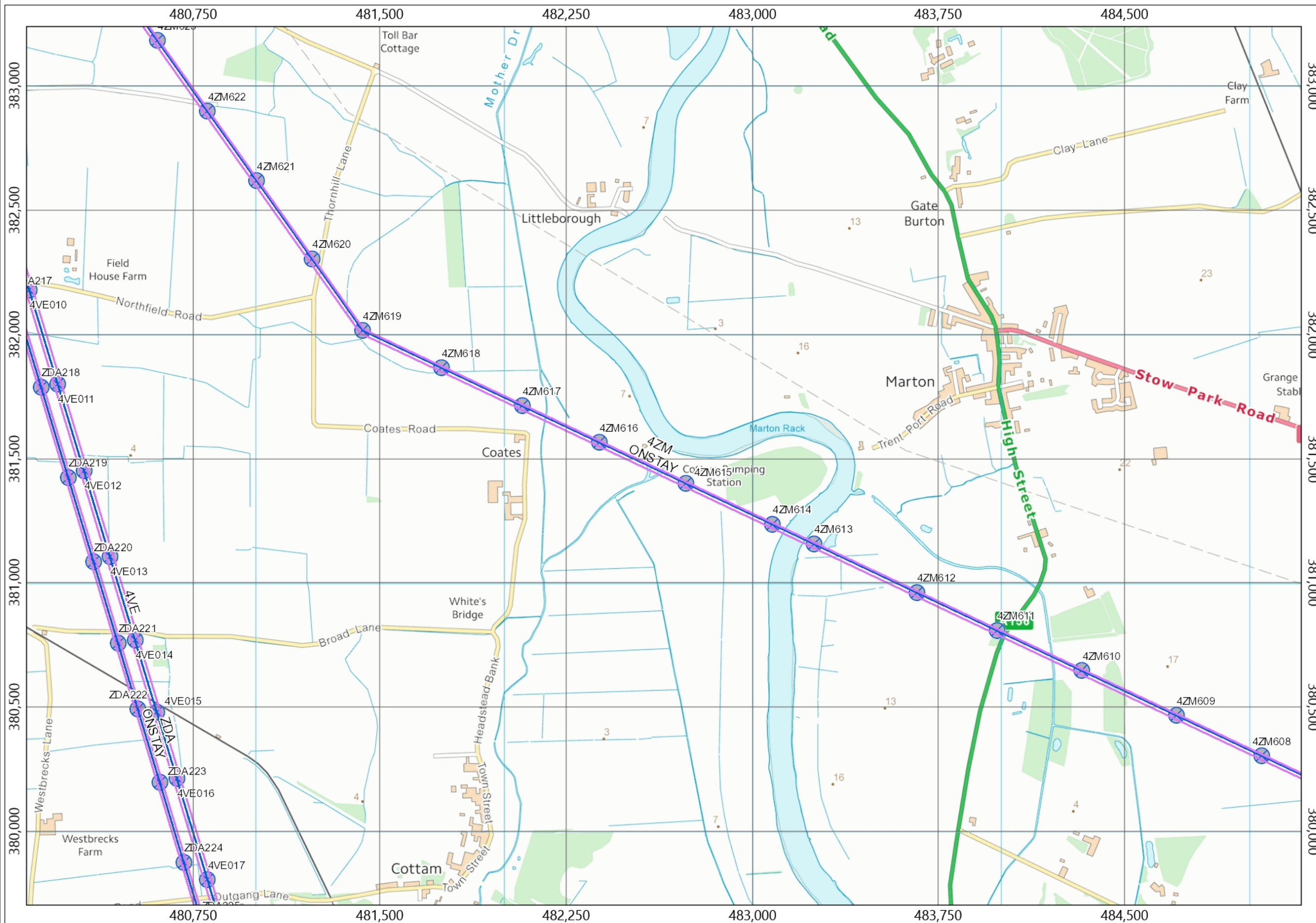
- Substations Commissioned
- Circuits
  - Commissioned
  - Decommissioned Group
  - Planned and Spares
- OHL 400kV Commissioned
- OHL 275kV Commissioned
- OHL 132kV & Below Commissioned
- Towers Commissioned
- Buried Cable Commissioned
- Fibre Cable Commissioned
- Pilot Cable
- Oil Pipe
- Cooling Pipe
- Cooling Station
- RAMM
- ▣ Cable Tunnel
- ▭ Gas Operational Boundary
- ▭ Gas Site Boundary
- Trial Hole
- Vantage Point
- Block Valve
- Compressor
- LNG Site
- Multijunction
- Minimum Offtake
- Future Minimum Offtake
- Offtake
- Pressure Reduction Installation
- Pig Trap
- Terminal
- Transferred Offtake
- Aerial Marker Post
- Pipe Crossing Point
- CP Test Post
- Transformer Rectifier
- Pipeline Crossing
- Sleeve
  - Nitrogen Sleeve
  - Other Sleeves
- SRP Sightings - Open
- LSBUD Enquiries - Open
- Land Parcel
- Pipe Line Control Point
- Named Pipeline Section
- River Crossings

**Notes:**

Cottam Solar Project NGET Plan 1







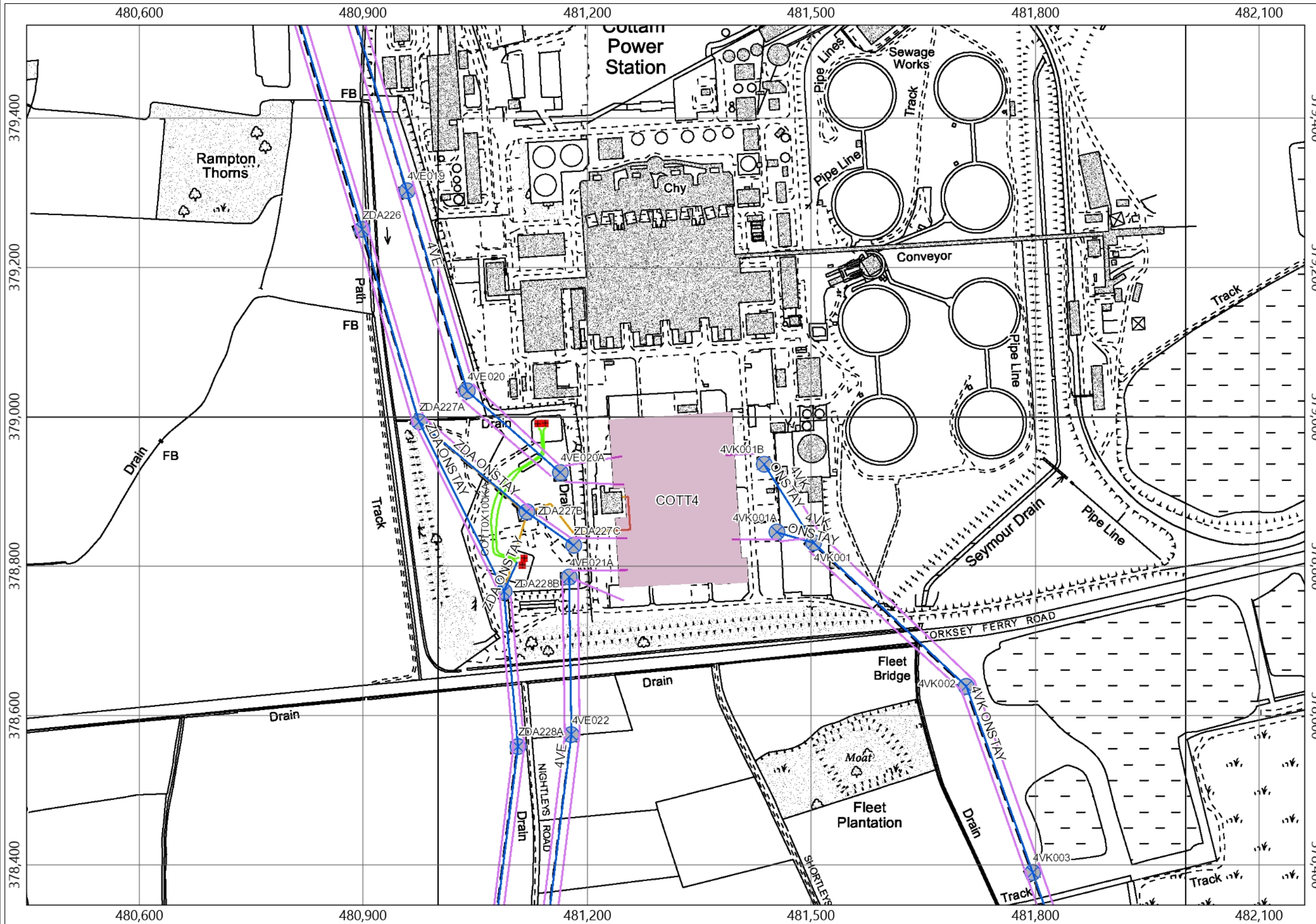
**Legend:**

- Substations Commissioned
- Circuits
  - Commissioned
  - Decommissioned Group
  - Planned and Spares
- OHL 400kV Commissioned
- OHL 275kV Commissioned
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- Pipeline Crossing
- Sleeve
  - Nitrogen Sleeve
  - Other Sleeves
- SRP Sightings - Open
- LSBUD Enquiries - Open
- Land Parcel
- Pipe Line Control Point
- Named Pipeline Section
- River Crossings

**Notes:**  
Cottam Solar Project NGET Plan 2







**Legend:**

- Substations Commissioned
- Circuits
  - Commissioned
  - Decommissioned Group
  - Planned and Spares
- OHL 400kV Commissioned
- OHL 275kV Commissioned
- OHL 132kV & Below Commissioned
- Towers Commissioned
- Buried Cable Commissioned
- Fibre Cable Commissioned
- Pilot Cable
- Pillar
- Oil Tank
- Link Box
- Gauge
- Joint Bay
- Cable Joint
- Oil Pipe
- Cooling Pipe
- Cooling Station
- RAMM
- Cable Tunnel
- Gas Operational Boundary
- Gas Site Boundary
- Trial Hole
- Vantage Point
- Block Valve
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- Pipeline Crossing Sleeve
- Nitrogen Sleeve
- Other Sleeves
- SRP Sightings - Open
- LSBUD Enquiries - Open
- Land Parcel
- Pipe Line Control Point
- Named Pipeline Section
- River Crossings

**Notes:**  
Cottam Solar Project Plan 3





**From:** [NATS Safeguarding](#)  
**To:** [Cottam Solar Project](#)  
**Subject:** RE: EN010133 Cottam Solar Park Project - EIA Scoping Report Notification and Consultation [SG32732]  
**Date:** 31 January 2022 10:46:26  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)

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Our Ref: SG32732

Dear Sir/Madam

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully

**NATS**

NATS Safeguarding

E: [natssafeguarding@nats.co.uk](mailto:natssafeguarding@nats.co.uk)

4000 Parkway, Whiteley,  
Fareham, Hants PO15 7FL  
[www.nats.co.uk](http://www.nats.co.uk)



Date: 25 February 2022  
Our ref: 381685  
Your ref: EN010132-000014



Emily Park  
The Planning Inspectorate  
Environmental Services  
Central Operations  
Temple Quay House  
2 The Square  
Bristol  
BS1 6PN

Consultations  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T [REDACTED]

## BY EMAIL ONLY

Dear Emily Park

### **Environmental Impact Assessment Scoping Consultation (Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11): Cottam Solar Project**

Thank you for seeking our advice on the scope of the Environmental Statement (ES) in the consultation dated 28 January 2022.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

A robust assessment of environmental impacts and opportunities based on relevant and up to date environmental information should be undertaken prior to a decision on whether to grant a DCO. Annex 1 Provides Natural England's general advice on the scope of Environmental Impact Assessments (EIA). For this specific proposed development the Environmental Statement should particularly consider the following:

#### **1. Impact of the proposed development on the following designated sites**

- Laughton Common SSSI
- Scotton Common SSSI
- Scotton Beck Fields SSSI
- Scotton and Laughton Forest Ponds SSSI

We note reference made to these sites within Chapter 8 of the EIA Scoping report; the Environmental Statement would need to show any potential effects on these designations, including via impacts on foraging habitat, noise, water quality, air quality or other disturbance which may damage or destroy the interest features for which these Sites of Special Scientific Interest have been notified. Impacts would need to be considered at all stages of the proposed development i.e. construction, operation and de-commissioning. It should also detail the mitigation required to avoid any identified impacts on designated sites.

Cottam 3 lies within the surface water catchment of Laughton Common SSSI; thus we would like to see an assessment of any potential adverse impact on water quality which may impact the site.

It is noted that the final cable route corridor is yet to be determined, and welcome the intention that searches for designated sites within the cable route search area will be forthcoming. Potential

impacts from the cable route are largely limited to the construction phase due to the underground nature of the cables; the search areas appear to largely avoid any designated sites. However we would still anticipate an assessment to be made on any potential impacts to designated sites and species as a result of the cable route and grid connection infrastructure.

The proposed development is not within any Impact Risk Zones for European Designated sites; thus we would not anticipate any adverse impacts to European designated sites, or the need for HRA.

Natural England are engaging with the applicant, in conjunction with the West Burton Solar project, via our discretionary advice service with regard to avoiding adverse impacts to designated sites and protected species, as well as regarding potential Biodiversity Net Gains, Green Infrastructure Enhancements and Priority Habitat Delivery.

## 2. In-Combination/Cumulative impacts

The Environmental Statement should include in-combination/cumulative assessment. We welcome section 2.2.15 which notes that projects being considered within the cumulative assessment include West Burton Solar Project and Gate Burton Solar Project. We are aware of a number of other large Solar Infrastructure Projects in the Lincolnshire/North Nottinghamshire area, including **Mallard Pass Solar Project** and **Heckington Fen Solar Project**. Due to the size of each of these individual projects, we would like to see these projects also included within the cumulative assessment, where appropriate.

## 3. Loss of Agricultural Land (BMV)

It is recognised that due to the nature of the solar panels a good proportion of the agricultural land affected by the development will not be *permanently* lost. However, the large development area and 40 year development lifetime give rise to additional concern with regard to agricultural productivity. In order to both retain the long term potential of this land and to safeguard all soil resources as part of the overall sustainability of the whole development, it is important that the soil is able to retain as many of its many important functions and services (ecosystem services) as possible.

The following issues should be considered and included as part of the Environmental Statement (ES):

- The degree to which soils would be disturbed or damaged as part of the development
- The extent to which agricultural land would be disturbed or lost as part of this development, including whether any best and most versatile (BMV) agricultural land would be impacted.
- The ES should set out details of how any adverse impacts on BMV agricultural land can be minimised through site design/masterplan.
- The ES should also set out details of how any adverse impacts on soils can be avoided or minimised and demonstrate how soils will be sustainably used and managed, including consideration in site design and master planning, and areas for green infrastructure or biodiversity net gain. The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise off-site impacts.

It is noted that an *initial* ALC survey has been undertaken, which has indicated that 93.2% of the Cottam site area is grade 3b agricultural land. In order to fully assess the impacts to Best and Most Versatile land, a *detailed* Agricultural Land Classification (ALC) survey may be necessary. Where a detailed ALC and soil survey of the land is required, this should normally be at a detailed level, e.g.

one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres.

Further information is available in the [Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites](#) and The British Society of Soil Science Guidance Note [Benefitting from Soil Management in Development and Construction](#). Further guidance is also set out in the Natural England [Guide to assessing development proposals on agricultural land](#).

#### **4. Protected Species**

The Environmental Statement should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). It should also provide details of any proposed mitigation measures required to protect these species. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area. It is noted that ground nesting birds may specifically be at risk due to the large land-take involved with the development.

As stated above, Natural England are engaging with the applicant via our Discretionary Advice Service and will be providing advice regarding the potential impacts, mitigation and licence requirements regarding protected species, including: Badgers, Bats, Otters, Water Vole, GCN, Reptiles, Barn Owl, Skylark, Yellow Wagtail and Grey Partridge.

#### **5. Biodiversity Net Gain**

The Environmental Statement should include a Biodiversity Net Gain Assessment and Habitat Management Plan. The Habitat Management Plan should explain how the site will continue to be managed and secured for the lifetime of the development. The habitat management plan should also provide details on retention and enhancement of existing habitat features such as hedgerows, woodland and ponds. We would also particularly need details on proposed habitat connectivity to surrounding habitats which would contribute to the wider Nature Recovery Network.

#### **6. After use**

The Environmental Statement should include details of the decommissioning and after use of the site, which should include details on how this will avoid impacts to soils and ensure the agricultural land can be restored to its former condition.

#### **7. Impact on local landscapes**

The Environmental Statement should include an assessment of local landscape character through the consideration of the relevant National Character Areas (NCAs) and any local landscape character assessments. This should also include any likely in-combination/cumulative effects from other known Solar Projects in the area.

Further guidance is set out in Planning Practice Guidance on [environmental assessment, natural environment and climate change](#).

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

We would be happy to comment further should the need arise but if in the meantime you have any queries, please do not hesitate to contact us. For any queries relating to the specific advice in this letter please contact Robbie Clarey at [REDACTED] [@naturalengland.org.uk](mailto:[REDACTED]@naturalengland.org.uk). Please send any new consultations or further information on this consultation to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely,

Robbie Clarey  
Lead Adviser – East Midlands Area Delivery  
Natural England

## Annex A – Natural England’s General Advice on EIA Scoping

### General Principles

[Schedule 4](#) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, sets out the information that should be included in an Environmental Statement (ES) to assess impacts on the natural environment. This includes:

- A description of the development – including physical characteristics and the full land use requirements of the site during construction and operational phases
- Expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation etc.) resulting from the operation of the proposed development
- An assessment of alternatives and clear reasoning as to why the preferred option has been chosen
- A description of the aspects of the environment likely to be significantly affected by the development including biodiversity (for example fauna and flora), land, including land take, soil, water, air, climate (for example greenhouse gas emissions, impacts relevant to adaptation, cultural heritage and landscape and the interrelationship between the above factors
- A description of the likely significant effects of the development on the environment – this should cover direct effects but also any indirect, secondary, cumulative, short, medium, and long term, permanent and temporary, positive, and negative effects. Effects should relate to the existence of the development, the use of natural resources (in particular land, soil, water and biodiversity) and the emissions from pollutants. This should also include a description of the forecasting methods to predict the likely effects on the environment
- A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment
- A non-technical summary of the information
- An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information

Further guidance is set out in Planning Practice Guidance on [environmental assessment](#) and [natural environment](#).

### Cumulative and in-combination effects

The ES should fully consider the implications of the whole development proposal. This should include an assessment of all supporting infrastructure.

An impact assessment should identify, describe, and evaluate the effects that are likely to result from the project in combination with other projects and activities that are being, have been or will be carried out. The following types of projects should be included in such an assessment (subject to available information):

- a. existing completed projects;
- b. approved but uncompleted projects;
- c. ongoing activities;
- d. plans or projects for which an application has been made and which are under consideration by the consenting authorities; and
- e. plans and projects which are reasonably foreseeable, i.e. projects for which an application has not yet been submitted, but which are likely to progress before completion of the development and for which sufficient information is available to assess the likelihood of cumulative and in-combination effects.

## Environmental data

Natural England is required to make available information it holds where requested to do so. National datasets held by Natural England are available at <http://www.naturalengland.org.uk/publications/data/default.aspx>.

Detailed information on the natural environment is available at [www.magic.gov.uk](http://www.magic.gov.uk).

Natural England's SSSI Impact Risk Zones are a GIS dataset which can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the [Natural England Open Data Geportal](#).

Natural England does not hold local information on local sites, local landscape character, priority habitats and species or protected species. Local environmental data should be obtained from the appropriate local bodies. This may include the local environmental records centre, the local wildlife trust, local geo-conservation group or other recording society.

## Biodiversity and Geodiversity

### General principles

The [National Planning Policy Framework](#) (paragraphs 174-175 and 179-182) sets out how to take account of biodiversity and geodiversity interests in planning decisions. Further guidance is set out in Planning Practice Guidance on the [natural environment](#).

The potential impact of the proposal upon sites and features of nature conservation interest and opportunities for nature recovery and biodiversity net gain should be included in the assessment.

Ecological Impact Assessment (EclA) is the process of identifying, quantifying, and evaluating the potential impacts of defined actions on ecosystems or their components. EclA may be carried out as part of the EIA process or to support other forms of environmental assessment or appraisal. [Guidelines](#) have been developed by the Chartered Institute of Ecology and Environmental Management (CIEEM).

### Designated nature conservation sites

#### Nationally designated sites

This development site is within or may impact on the following **Sites of Special Scientific Interest**:

- Laughton Common SSSI
- Scotton Common SSSI
- Scotton Beck Fields SSSI
- Scotton and Laughton Forest Ponds SSSI

Sites of Special Scientific Interest are protected under the Wildlife and Countryside Act 1981 and paragraph 180 of the NPPF. Further information on the SSSI and its special interest features can be found at [www.magic.gov](http://www.magic.gov).

Natural England's SSSI Impact Risk Zones can be used to help identify the potential for the development to impact on a SSSI. The dataset and user guidance can be accessed from the [Natural England Open Data Geportal](#).

The Environmental Statement should include a full assessment of the direct and indirect effects of the development on the features of special interest within the SSSIs and identify appropriate mitigation measures to avoid, minimise or reduce any adverse significant effects. The consideration of likely significant effects should include any functionally linked land outside the designated site. These areas may provide important habitat for mobile species populations that are interest features of the SSSI, for example birds and bats. This can also include areas which have a critical function to

a habitat feature within a site, for example by being linked hydrologically or geomorphologically.

## **Regionally and Locally Important Sites**

The ES should consider any impacts upon local wildlife and geological sites, including local nature reserves. Local Sites are identified by the local wildlife trust, geoconservation group or other local group and protected under the NPPF (paragraph 174 and 175). The ES should set out proposals for mitigation of any impacts and if appropriate, compensation measures and opportunities for enhancement and improving connectivity with wider ecological networks. Contact the relevant local body for further information.

## **Protected Species**

The conservation of species protected under the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017 is explained in Part IV and Annex A of Government Circular 06/2005 [Biodiversity and Geological Conservation: Statutory Obligations and their Impact within the Planning System.](#)

The ES should assess the impact of all phases of the proposal on protected species (including, for example, great crested newts, reptiles, birds, water voles, badgers and bats). Natural England does not hold comprehensive information regarding the locations of species protected by law. Records of protected species should be obtained from appropriate local biological record centres, nature conservation organisations and local groups. Consideration should be given to the wider context of the site, for example in terms of habitat linkages and protected species populations in the wider area.

The area likely to be affected by the development should be thoroughly surveyed by competent ecologists at appropriate times of year for relevant species and the survey results, impact assessments and appropriate accompanying mitigation strategies included as part of the ES. Surveys should always be carried out in optimal survey time periods and to current guidance by suitably qualified and, where necessary, licensed, consultants.

Natural England are currently in discussions with the applicant, via our Discretionary Advice Service, regarding impacts to protected species. We aim to work with the applicant to ensure the development proposals will not harm protected species.

## **District Level Licensing for Great Crested Newts**

District level licensing (DLL) is a type of strategic mitigation licence for great crested newts (GCN) granted in certain areas at a local authority or wider scale. A [DLL scheme for GCN](#) may be in place at the location of the development site. If a DLL scheme is in place, developers can make a financial contribution to strategic, off-site habitat compensation instead of applying for a separate licence or carrying out individual detailed surveys. By demonstrating that DLL will be used, impacts on GCN can be scoped out of detailed assessment in the Environmental Statement.

## **Priority Habitats and Species**

Priority Habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Lists of priority habitats and species can be found [here](#). Natural England does not routinely hold species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. Sites can be checked against the (draft) national Open Mosaic Habitat (OMH) inventory published by Natural England and freely available to [download](#). Further information is also available [here](#).



An appropriate level habitat survey should be carried out on the site, to identify any important habitats present. In addition, ornithological, botanical, and invertebrate surveys should be carried out at appropriate times in the year, to establish whether any scarce or priority species are present.

The Environmental Statement should include details of:

- Any historical data for the site affected by the proposal (e.g. from previous surveys)
- Additional surveys carried out as part of this proposal
- The habitats and species present
- The status of these habitats and species (e.g. whether priority species or habitat)
- The direct and indirect effects of the development upon those habitats and species
- Full details of any mitigation or compensation measures
- Opportunities for biodiversity net gain or other environmental enhancement

### **Ancient Woodland, ancient and veteran trees**

The ES should assess the impacts of the proposal on any ancient woodland, ancient and veteran trees, and the scope to avoid and mitigate for adverse impacts. It should also consider opportunities for enhancement.

Natural England maintains the Ancient Woodland [Inventory](#) which can help identify ancient woodland. The [wood pasture and parkland inventory](#) sets out information on wood pasture and parkland.

The [ancient tree inventory](#) provides information on the location of ancient and veteran trees.

### **Biodiversity net gain**

Paragraph 174 of the NPPF states that decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

Biodiversity Net Gain is additional to statutory requirements relating to designated nature conservation sites and protected species.

The ES should use an appropriate biodiversity metric such as [Biodiversity Metric 3.0](#) together with ecological advice to calculate the change in biodiversity resulting from proposed development and demonstrate how proposals can achieve a net gain.

The metric should be used to:

- assess or audit the biodiversity unit value of land within the application area
- calculate the losses and gains in biodiversity unit value resulting from proposed development
- demonstrate that the required percentage biodiversity net gain will be achieved

Biodiversity Net Gain outcomes can be achieved on site, off-site or through a combination of both. On-site provision should be considered first. Delivery should create or enhance habitats of equal or higher value. When delivering net gain, opportunities should be sought to link delivery to relevant plans or strategies e.g. Green Infrastructure Strategies or Local Nature Recovery Strategies.

Opportunities for wider environmental gains should also be considered.

### **Landscape**

#### **Landscape and visual impacts**

The environmental assessment should refer to the relevant [National Character Areas](#). Character area profiles set out descriptions of each landscape area and statements of environmental opportunity.

The ES should include a full assessment of the potential impacts of the development on local

landscape character using [landscape assessment methodologies](#). We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing, and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character.

A landscape and visual impact assessment should also be carried out for the proposed development and surrounding area. Natural England recommends use of the methodology set out in *Guidelines for Landscape and Visual Impact Assessment 2013* ((3rd edition) produced by the Landscape Institute and the Institute of Environmental Assessment and Management. For National Parks and AONBs, we advise that the assessment also includes effects on the 'special qualities' of the designated landscape, as set out in the statutory management plan for the area. These identify the particular landscape and related characteristics which underpin the natural beauty of the area and its designation status.

The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. This should include an assessment of the impacts of other proposals currently at scoping stage.

To ensure high quality development that responds to and enhances local landscape character and distinctiveness, the siting and design of the proposed development should reflect local characteristics and, wherever possible, use local materials. Account should be taken of local design policies, design codes and guides as well as guidance in the [National Design Guide](#) and [National Model Design Code](#). The ES should set out the measures to be taken to ensure the development will deliver high standards of design and green infrastructure. It should also set out detail of layout alternatives, where appropriate, with a justification of the selected option in terms of landscape impact and benefit.

### **Heritage Landscapes**

The ES should include an assessment of the impacts on any land in the area affected by the development which qualifies for conditional exemption from capital taxes on the grounds of outstanding scenic, scientific, or historic interest. An up-to-date list is available at [www.hmrc.gov.uk/heritage/lbsearch.htm](http://www.hmrc.gov.uk/heritage/lbsearch.htm).

### **Connecting People with nature**

The ES should consider potential impacts on access land, common land, public rights of way and, where appropriate, the England Coast Path and coastal access routes and coastal margin in the vicinity of the development, in line with NPPF paragraph 100. It should assess the scope to mitigate for any adverse impacts. Rights of Way Improvement Plans (ROWIP) can be used to identify public rights of way within or adjacent to the proposed site that should be maintained or enhanced.

Measures to help people to better access the countryside for quiet enjoyment and opportunities to connect with nature should be considered. Such measures could include reinstating existing footpaths or the creation of new footpaths, cycleways, and bridleways. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Access to nature within the development site should also be considered, including the role that natural links have in connecting habitats and providing potential pathways for movements of species.

Relevant aspects of local authority green infrastructure strategies should be incorporated where appropriate.

### **Soils and Agricultural Land Quality**

Soils are a valuable, finite natural resource and should also be considered for the ecosystem services they provide, including for food production, water storage and flood mitigation, as a carbon

store, reservoir of biodiversity and buffer against pollution. It is therefore important that the soil resources are protected and sustainably managed. Impacts from the development on soils and best and most versatile (BMV) agricultural land should be considered in line with paragraphs 174 and 175 of the NPPF. Further guidance is set out in the Natural England [Guide to assessing development proposals on agricultural land](#).

As set out in paragraph 211 of the NPPF, new sites or extensions to sites for peat extraction should not be granted planning permission.

The following issues should be considered and, where appropriate, included as part of the Environmental Statement (ES):

- The degree to which soils would be disturbed or damaged as part of the development
- The extent to which agricultural land would be disturbed or lost as part of this development, including whether any best and most versatile (BMV) agricultural land would be impacted.

This may require a detailed Agricultural Land Classification (ALC) survey if one is not already available. For information on the availability of existing ALC information see [www.magic.gov.uk](http://www.magic.gov.uk).

- Where an ALC and soil survey of the land is required, this should normally be at a detailed level, e.g. one auger boring per hectare, (or more detailed for a small site) supported by pits dug in each main soil type to confirm the physical characteristics of the full depth of the soil resource, i.e. 1.2 metres. The survey data can inform suitable soil handling methods and appropriate reuse of the soil resource where required (e.g. agricultural reinstatement, habitat creation, landscaping, allotments and public open space).
- The ES should set out details of how any adverse impacts on BMV agricultural land can be minimised through site design/masterplan.
- The ES should set out details of how any adverse impacts on soils can be avoided or minimised and demonstrate how soils will be sustainably used and managed, including consideration in site design and master planning, and areas for green infrastructure or biodiversity net gain. The aim will be to minimise soil handling and maximise the sustainable use and management of the available soil to achieve successful after-uses and minimise off-site impacts.

Further information is available in the [Defra Construction Code of Practice for the Sustainable Use of Soil on Development Sites](#) and The British Society of Soil Science Guidance Note [Benefitting from Soil Management in Development and Construction](#).

## **Air Quality**

Air quality in the UK has improved over recent decades but air pollution remains a significant issue. For example, approximately 85% of protected nature conservation sites are currently in exceedance of nitrogen levels where harm is expected (critical load) and approximately 87% of sites exceed the level of ammonia where harm is expected for lower plants (critical level of 1µg)<sup>[1]</sup>. A priority action in the England Biodiversity Strategy is to reduce air pollution impacts on biodiversity. The Government's Clean Air Strategy also has a number of targets to reduce emissions including to reduce damaging deposition of reactive forms of nitrogen by 17% over England's protected priority sensitive habitats by 2030, to reduce emissions of ammonia against the 2005 baseline by 16% by 2030 and to reduce emissions of NO<sub>x</sub> and SO<sub>2</sub> against a 2005 baseline of 73% and 88% respectively by 2030. Shared Nitrogen Action Plans (SNAPs) have also been identified as a tool to reduce environmental damage from air pollution.

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<sup>[1]</sup> [Report: Trends Report 2020: Trends in critical load and critical level exceedances in the UK - Defra, UK](#)

The planning system plays a key role in determining the location of developments which may give rise to pollution, either directly, or from traffic generation, and hence planning decisions can have a significant impact on the quality of air, water and land. The ES should take account of the risks of air pollution and how these can be managed or reduced. This should include taking account of any strategic solutions or SNAPs, which may be being developed or implemented to mitigate the impacts on air quality. Further information on air pollution impacts and the sensitivity of different habitats/designated sites can be found on the Air Pollution Information System ([www.apis.ac.uk](http://www.apis.ac.uk)).

Information on air pollution modelling, screening and assessment can be found on the following websites:

- SCAIL Combustion and SCAIL Agriculture - <http://www.scaill.ceh.ac.uk/>
- Ammonia assessment for agricultural development <https://www.gov.uk/guidance/intensive-farming-risk-assessment-for-your-environmental-permit>
- Environment Agency Screening Tool for industrial emissions <https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit>
- Defra Local Air Quality Management Area Tool (Industrial Emission Screening Tool) – England <http://www.airqualityengland.co.uk/laqm>

## **Water Quality**

The planning system plays a key role in determining the location of developments which may give rise to water pollution, and hence planning decisions can have a significant impact on water quality, and land. The assessment should take account of the risks of water pollution and how these can be managed or reduced.

## **Climate Change**

The ES should identify how the development affects the ability of the natural environment (including habitats, species, and natural processes) to adapt to climate change, including its ability to provide adaptation for people. This should include impacts on the vulnerability or resilience of a natural feature (i.e. what's already there and affected) as well as impacts on how the environment can accommodate change for both nature and people, for example whether the development affects species ability to move and adapt. Nature-based solutions, such as providing green infrastructure on-site and in the surrounding area (e.g. to adapt to flooding, drought and heatwave events), habitat creation and peatland restoration, should be considered. The ES should set out the measures that will be adopted to address impacts.

Further information is available from the [Committee on Climate Change's \(CCC\) Independent Assessment of UK Climate Risk](#), the [National Adaptation Programme \(NAP\)](#), the [Climate Change Impacts Report Cards](#) (biodiversity, infrastructure, water etc.) and the [UKCP18 climate projections](#).

The Natural England and RSPB [Climate Change Adaptation Manual](#) (2020) provides extensive information on climate change impacts and adaptation for the natural environment and adaptation focussed nature-based solutions for people. It includes the Landscape Scale Climate Change Assessment Method that can help assess impacts and vulnerabilities on natural environment features and identify adaptation actions. Natural England's [Nature Networks Evidence Handbook](#) (2020) also provides extensive information on planning and delivering nature networks for people and biodiversity.

The ES should also identify how the development impacts the natural environment's ability to store and sequester greenhouse gases, in relation to climate change mitigation and the natural environment's contribution to achieving net zero by 2050. Natural England's [Carbon Storage and Sequestration by Habitat report](#) (2021) and the British Ecological Society's [nature-based solutions report](#) (2021) provide further information.

## **Contribution to local environmental initiatives and priorities**

The ES should consider the contribution the development could make to relevant local

environmental initiatives and priorities to enhance the environmental quality of the development and deliver wider environmental gains. This should include considering proposals set out in relevant local strategies or supplementary planning documents including landscape strategies, green infrastructure strategies, tree and woodland strategies, biodiversity strategies or biodiversity opportunity areas.

**From:** [REDACTED] on behalf of [Town Planning LNF](#)  
**To:** [Cottam Solar Project](#)  
**Subject:** Ref EN010133-000007 - Scoping Opinion, Cottam Solar Project  
**Date:** 21 February 2022 16:51:03  
**Attachments:** [image001.png](#)

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**FAO – Planning Inspectorate**  
**Ref – EN010133-000007**  
**Proposal – Scoping Opinion for Cottam Solar Project**  
**Location – Cottam Solar Project**

Thank you for your letter of 28 January 2022 providing Network Rail with an opportunity to comment on the abovementioned Scoping Opinion.

With reference to the protection of the railway, the Environmental Statement should consider any impact of the scheme upon the railway infrastructure and upon operational railway safety. In particular, it should include a Glint and Glare study assessing the impact of the scheme upon train drivers (including distraction from glare and potential for conflict with railway signals). It should also include a Transport Assessment to identify any HGV traffic/haulage routes that may utilise railway assets such as bridges and level crossings during the construction and operation of the site.

Please note that if the intention is to install cabling in support of the project through railway land, the developer will need an easement from Network Rail and we would recommend that they engage with us early in the planning of their scheme in order to discuss and agree this element of the proposals.

Kind regards



**Matt Leighton**  
Town Planning Technician  
**Diversity and Inclusion Champion**  
Network Rail Property - Eastern Region  
George Stephenson House, Toft Green, York, YO1 6JT

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\*\*\*\*\*



Major Casework Directorate - Katie Norris  
The Planning Inspectorate  
Temple Quay House  
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BS1 6PN

[www.newark-sherwooddc.gov.uk](http://www.newark-sherwooddc.gov.uk)

Telephone: [REDACTED]  
Email: [planning@nsdc.info](mailto:planning@nsdc.info)

Date: 01/02/2022  
Application ref: 22/00170/NPA

By email to [CottamSolarProject@planninginspectorate.gov.uk](mailto:CottamSolarProject@planninginspectorate.gov.uk)

Dear Ms Norris

**Consultation under the Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) - Regulations 10 and 11**

**Application by Cottam Solar Project Limited (the Applicant) for an Order granting Development Consent for the Cottam Solar Project (the Proposed Development)**

**Scoping consultation and notification of the Applicant's contact details and duty to make available information to the Applicant if requested**

**Proposal:** The Scheme consists of three electricity generating stations each with a capacity of over 50 megawatts (MW) comprising of ground mounted solar arrays; and Associated Development comprising of energy storage, grid connection infrastructure and other infrastructure integral to the construction, operation and maintenance of the Scheme.  
To view this application, please follow the link; <https://infrastructure.planninginspectorate.gov.uk/projects/east-midlands/cottamsolar-project/>

**Site Address:** Cottam Solar Project

I refer to the above consultation received by this Authority on 28 January 2022.

The site, as described within Chapter 3 of the Cottam Solar Project EIA Scoping Report dated January 2022, is located outside of Newark and Sherwood District. The proposed areas of solar panels and associated development would be sited to the north and north east of Cottam Power Station, which is located approximately 8.0km north west of the nearest district village of Thorney. Following a review of the Scoping Report, I can confirm that Newark and Sherwood District Council has no comments to make on the information to be provided in the Environmental Statement.

Please note that this matter has not been formally reported to the District Council's Planning Committee. In these circumstances the comments are those of an Officer of the Council under delegated power arrangements.

Yours sincerely,



Lisa Hughes  
Business Manager – Planning Development





North Kesteven  
DISTRICT COUNCIL

## Neighbouring Authority Consultation

Name and address of applicant

Emily Park  
Environmental Services  
Central Operations  
Temple Quay House  
2 The Square  
Bristol  
BS1 6PN

Name and address of agent (if any)

### Notice of decision to raise comments to the proposal

<b>Application number:</b>	<b>22/0153/NEIAUT</b>
<b>Proposal:</b>	<b>Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations), Application by Cottam Solar Park Project for an Order granting Development Consent for the Cottam Solar Park Project - Request for Scoping Opinion</b>
<b>Location:</b>	<b>Cottam Energy Park</b>

North Kesteven District Council hereby raises the following comments to the proposed development as referred to above.

North Kesteven District Council does not wish to make detailed comments in relation to the scope of the Environmental Statement in relation to the proposed Cottam Energy Park but would offer the following observations. The Cottam Energy Park is one of a number of relatively recently publicised large scale solar farms proposed in or straddling Lincolnshire and which are collectively subject to the provisions of the Planning Act (2008) and as such are classified as Nationally Significant Infrastructure Projects (NSIPs).

This includes the proposed circa 500MW Heckington Fen solar park being promoted by Ecotricity in North Kesteven District and which has been accepted by the Planning Inspectorate and where an application for Development Consent Order is expected to be submitted to the Planning Inspectorate by the 4th Quarter 2022. A Scoping Request has been submitted to the Planning Inspectorate, referenced EN010123-000014.

The Planning Inspectorate has also recently issued a Scoping Opinion in relation to the Gate Burton Energy Park (EN010131-000006) in West Lindsey District. Elsewhere in Lincolnshire (or spanning the Lincolnshire boundary) the West Burton and Mallard Pass Solar Parks have also been accepted as

Date: 31st January 2022

District Council Offices, Kesteven Street  
Sleaford, Lincolnshire, NG34 7EF

  
Development Manager

NSIP projects. The West Burton scheme is currently awaiting a Scoping Opinion from the Planning Inspectorate.

The Cottam Energy Park is located around 45km north-west of the Heckington Fen solar park and therefore cumulative construction and operational impacts are likely to be negligible across the majority of EIA topic areas as listed in the Lanpro Scoping Request document. There will be no intervisibility between the Cottam and Heckington proposals.

However whilst paragraph 22.2.4 of the Scoping Report confirm that initial ALC surveys of the sites have been carried out, indicating that the majority (93.2%) of the land proposed for development comprises Grade 3b agricultural land, Chapter 22 does not commit to assessing cumulative agricultural land impacts associated with the development of the respective large scale solar proposals; being Gate Burton, West Burton, Cottam, Heckington and Mallard Pass. The Cottam 1-3 sites total 1270 hectares, meaning that around 86 hectares of land is envisaged at this stage to fall within the BMV classification.

Whilst Lincolnshire has a large quantity and high relative proportion of BMV agricultural land, the potential development of 5 substantial NSIP-scaled solar farms (as currently registered with PINS) has the potential to result in a degree of cumulative adverse impact stemming from temporary loss of opportunity for the continued cultivation of potential BMV land across the County. We would therefore request that the Planning Inspectorate give consideration to this issue being scoped in to the 'Agricultural Circumstances' chapter of the ES and that cumulative agricultural land impacts are considered across the registered projects, adhering to ALC Best Practice published by Natural England.

Enquiries to: Rebecca Leggott  
Direct Dial: [REDACTED]  
E-mail: [REDACTED]@northlincs.gov.uk



Your Ref: EN010133-000007  
Our Ref: CON/2022/263  
Date: 25<sup>th</sup> February 2022

The Planning Inspectorate National Infrastructure Case  
Team – email only

Your Ref: TR030006

Dear Sir/ Madam,

**Re: Scoping consultation in respect of a proposed DCO for the Cottam Solar Project**

Thank you for your consultation letter dated 28<sup>th</sup> January 2022.

I have taken the opportunity to review the Environmental Impact Assessment Scoping Report. Technical consultees within the Council have raised matters which will hopefully advise the final production of the Environmental Statement and support you in make a robust submission to the Planning Inspectorate.

North Lincolnshire Council does not wish to raise any objections to the principle of the proposed scheme at this moment in time. At examination stage North Lincolnshire Council will engage with the Examining Authority and as such we do reserve the right to raise concerns at a later stage following consideration of the application once submitted.

At this stage of pre-application consultation, I would like to make the following observations:

**Chapter 5 – Legislative Context and Energy Policy**

Having considered Chapter 5 of the EIASR, NLC do not have any objections to the approach set out in the EIASR at this stage.

**Chapter 6 – Climate Change**

Having considered Chapter 6 of the EIASR, it is noted that the proposals are likely to have a positive impact in respect of climate change. Furthermore, NLC do not have any objections to the approach set out in the EIASR at this stage.

## **Chapter 7 – Landscape and Visual**

Having considered Chapter 7 of the EIASR, it is noted that the site does not contain any International or National Designations such as World Heritage Sites, National Parks or Areas of Outstanding Natural Beauty. However, the proposals do have the potential to affect landscape and visual receptors within the North Lincolnshire Area. Comments have been sought from the Natural Environment Policy Specialist. However, no response has been received as of yet. Therefore, this will be forward on to yourselves once received.

## **Chapter 8 – Ecology and Biodiversity**

Having considered Chapter 8 of the EIASR, it is noted that the likely residual effects range from beneficial to significant adverse effects. Comments have been sought from the Natural Environment Policy Specialist. However, no response has been received as of yet. Therefore, this will be forward on to yourselves once received.

## **Chapter 9 – Hydrology, Flood Risk and Drainage**

Having considered Chapter 9 of the EIASR, it is noted that the likely residual effects range from temporary adverse to permanent adverse. Comments have been sought from the LLFA. However, no response has been received as of yet. Therefore, this will be forward on to yourselves once received.

## **Chapter 10 – Ground Conditions and Contamination**

Having considered Chapter 10 of the EIASR, it is noted that the likely residual effects are negligible. The Environmental Protection Team have advised that they have no comments to make on the proposals. Therefore, NLC do not have any objections to the approach set out in the EIASR at this stage.

## **Chapter 11 – Minerals**

Having considered Chapter 11 of the EIASR, the Environmental Protection Team have advised that they have no comments to make on the proposals. Therefore, NLC do not have any objections to the approach set out in the EIASR at this stage.

## **Chapter 12 – Archaeology**

Having considered Chapter 12 of the EIASR, it is noted that there will be no cumulative or in combination effects. The Historic Environment Officer considered that this proposal will not affect heritage assets within North Lincolnshire. Therefore, NLC do not have any objections to the approach set out in the EIASR at this stage.

## **Chapter 13 – Built Heritage**

Having considered Chapter 13 of the EIASR, it is noted that there will be no direct impact to designated heritage assets across Cottam 1, 2 and 3. NLC do not have any objections to the approach set out in the EIASR at this stage.

## **Chapter 14 – Transport and Access**

Having considered Chapter 14 of the EIASR, it is noted that the likely residual effects would be negligible. The proposed site is located in Lincolnshire and as such NLC do not envisage the proposals have a significant impact on the highway network in North Lincolnshire. Therefore, NLC do not have any objections to the approach set out in the EIASR at this stage.

## **Chapter 15 – Noise and Vibration**

Having considered Chapter 15 of the EIASR, it is noted that the likely effects of noise and vibration would be limited. The Environmental Protection Team have advised that they have no comments to make on the proposals. Therefore, NLC do not have any objections to the approach set out in the EIASR at this stage.

## **Chapter 16 – Glint and Glare**

Having considered Chapter 16 of the EIASR, NLC do not have any objections to the approach set out in the EIASR at this stage. However, it should be noted that NLC does not have expertise in the methods used in this specific study.

## **Chapter 17 – Electromagnetic Fields**

Having considered Chapter 17 of the EIASR, NLC do not have any objections to the approach set out in the EIASR at this stage. However, it should be noted that NLC does not have expertise in the methods used in this specific study.

## **Chapter 18 – Light Pollution**

Having considered Chapter 18 of the EIASR, it is noted that the use of artificial lighting has the potential to impact on ecological receptors. The Environmental Protection Team have advised that they have no comments to make on the proposals. Therefore, NLC do not have any objections to the approach set out in the EIASR at this stage.

## **Chapter 19 – Major Accidents and Disasters**

Having considered Chapter 19 of the EIASR, NLC do not have any objections to the approach set out in the EIASR at this stage.

## **Chapter 20 – Air Quality**

Having considered Chapter 20 of the EIASR, the Environmental Protection Team have advised that they have no comments to make on the proposals. Therefore, NLC do not have any objections to the approach set out in the EIASR at this stage.

### **Chapter 21 – Socio- Economics, Tourism and Recreation and Human Health**

Having considered Chapter 21 of the EIASR, it is noted that the impacts range from beneficial negative in respect of loss of agricultural land and risks of fire. NLC do not have any objections to the approach set out in the EIASR at this stage.

### **Chapter 22 – Agricultural Circumstances**

Having considered Chapter 22 of the EIASR, NLC do not have any objections to the approach set out in the EIASR at this stage. However, it should be noted that NLC does not have expertise in the methods used in this specific study.

### **Chapter 23 – Waste**

Having considered Chapter 23 of the EIASR, it is noted that the impacts would be limited. The Environmental Protection Team have advised that they have no comments to make on the proposals. Therefore, NLC do not have any objections to the approach set out in the EIASR at this stage.

### **Chapter 24 – Telecommunications, utilities and Television Receptors**

Having considered Chapter 24 of the EIASR, NLC do not have any objections to the approach set out in the EIASR at this stage. However, it should be noted that NLC does not have expertise in the methods used in this specific study.

### **Other**

We will forward any comments received subsequent to the production of this response as soon as they are received.

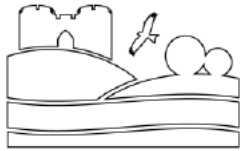
I trust that the comments contained within this letter are helpful. Please do not hesitate to contact me should you wish to discuss any aspect of this response or this development.

Yours Sincerely



**Rebecca Leggott**

**Principle Development Management Officer**



**North  
Northamptonshire  
Council**

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Email: [REDACTED]@northnorthants.gov.uk  
Our Ref: NW/22/00061/SCQ  
Your Ref:  
Date: 1 February 2022

Dear Sir/Madam

**Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations) – Regulations 10 and 11**

Application No. NW/22/00061/SCQ

Proposal: Application by Cottam Solar Project Limited (the Applicant) for an Order granting Development Consent for the Cottam Solar Project (the Proposed Development)

Location: Cottam 1 Land Parcel Located To The East Of Willingham By Stow

Case Officer: Mr Duncan Law

**Application by Cottam Solar Project Limited (the Applicant) for an Order granting Development Consent for the Cottam Solar Project (the Proposed Development)**

Thank you for your letter inviting North Northants Council (Wellingborough area) to comment on the above application. We have reviewed the application and provide the following comments:

**No Comment**

Yours faithfully

[REDACTED]  
George Candler  
Executive Director Place and Economy

**Telephone:** [REDACTED] (open 9am - 1pm)  
**Email:** planningcontrol@peterborough.gov.uk  
**Case Officer:** Mr Asif Ali  
**Our Ref:** 22/00822/CONSUL  
**Your Ref:** EN010133-000007

**PETERBOROUGH**



Planning Services

Sand Martin House  
Bittern Way  
Fletton Quays  
Peterborough  
PE2 8TY

Katie Norris  
Planning Inspectorate  
Environmental Services  
Central Operations  
Temple Quay House  
2 The Square  
Bristol, BS1 6PN

**Peterborough Direct:** [REDACTED]

17 February 2022

Dear Sir/Madam

### **Planning enquiry**

Proposal: Application by Cottam Solar Project Ltd The Scheme consists of three electricity generating stations

Site address: Cottam Solar Park Project

Further to your enquiry received on 28 January 2022, in respect of the above, the Local Planning Authority makes the following comments:

In response to the Scoping Opinion consultation for ref EN010133-000007, Cottam Solar Project Limited, Peterborough City Council confirm we have no comments to make.

I trust that the above advice is of use however should you have any further queries, please do not hesitate to contact me on the details shown at the top of this letter.

Yours faithfully

Mr Asif Ali  
Development Management Officer



**From:** [REDACTED]  
**To:** [Cottam Solar Project](#)  
**Subject:** EN010133 Cottam Solar Park  
**Date:** 14 February 2022 14:32:24

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Good afternoon

Please find below comments from Sturton By Stow Parish Council:

#### 1.4.1 Add Lincolnshire Wildlife Trust

4.4.4 Although general principles at this juncture, the stated mitigation and enhancement measures lack imagination and ambition and will be insufficient to achieve the stated (at public consultation) 60-80% BNG. The River Till ecological restoration corridor (as identified by the developer in its published supporting papers) presents a good opportunity to transform the area in terms of BNG. Measures that target this and restore priority habitats should form a principle.

8.2.10 The comments in the above 4.4.4 should be included in this section too.

8.2.44 Golden plover is a species that often uses the fields in the proposed area during winter, sometime in high numbers. Lapwing too, although usually in fewer numbers.

8.2.48 A plant species of note in Cottam 1 is great burnet (*Sanguisorbum officinalis*), an MG4 indicator species that occurs in patches along Fleets Lane and Thorpe Lane. Sturton by Stow Primary School is issuing from the infrastructure map. A big issue regarding traffic at peak times.

Ingham Road has a weight limit of 7.5t therefore problems are likely with the road structure - the crane that went into the ditch caused many problems.

Swans are resident on the Till, but no mention of them.

How has the land been classed as 3b when the defra magic map is 3a?

Kind Regards  
Yvonne Clark  
parish clerk



UK Health  
Security  
Agency

Environmental Hazards and Emergencies Department  
Seaton House, City Link  
London Road  
Nottingham, NG2 4LA

[nsipconsultations@phe.gov.uk](mailto:nsipconsultations@phe.gov.uk)  
[www.gov.uk/ukhsa](http://www.gov.uk/ukhsa)

Your Ref: EN010133-000007  
Our Ref: CIRIS58829

Ms Emily Park,  
Environmental Services  
The Planning Inspectorate  
Temple Quay House  
2 The Square  
Bristol BS1 6PN

24<sup>th</sup> February 2022

Dear Ms Park

**Nationally Significant Infrastructure Project  
Cottam Solar Project  
Scoping Consultation Stage**

Thank you for including the UK Health Security Agency (UKHSA) in the scoping consultation phase of the above application. ***Please note that we request views from the Office for Health Improvement and Disparities (OHID) and the response provided below is sent on behalf of both UKHSA and OHID.*** The response is impartial and independent.

The health of an individual or a population is the result of a complex interaction of a wide range of different determinants of health, from an individual's genetic make-up, to lifestyles and behaviours, and the communities, local economy, built and natural environments to global ecosystem trends. All developments will have some effect on the determinants of health, which in turn will influence the health and wellbeing of the general population, vulnerable groups and individual people. Although assessing impacts on health beyond direct effects from for example emissions to air or road traffic incidents is complex, there is a need to ensure a proportionate assessment focused on an application's significant effects.

Having considered the submitted scoping report we wish to make the following specific comments and recommendations:

**Environmental Public Health**

We understand that the promoter will wish to avoid unnecessary duplication and that many issues including air quality, emissions to water, waste, contaminated land etc. will be

covered elsewhere in the Environmental Statement (ES). We believe the summation of relevant issues into a specific section of the report provides a focus which ensures that public health is given adequate consideration. The section should summarise key information, risk assessments, proposed mitigation measures, conclusions and residual impacts, relating to human health. See comment under population and human health assessment section below for further details. Compliance with the requirements of National Policy Statements and relevant guidance and standards should also be highlighted.

In terms of the level of detail to be included in an ES, we recognise that the differing nature of projects is such that their impacts will vary. UKHSA and OHID's predecessor organisation Public Health England produced an advice document *Advice on the content of Environmental Statements accompanying an application under the NSIP Regime*<sup>1</sup>, setting out aspects to be addressed within the Environmental Statement<sup>1</sup>. This advice document and its recommendations are still valid and should be considered when preparing an ES. Please note that where impacts relating to health and/or further assessments are scoped out, promoters should fully explain and justify this within the submitted documentation.

- The developer scopes out detailed modelling of air quality impacts during the construction phase. Section 20.5.1 scopes in an assessment of dust impacts during construction but it is unclear why the potential particulate matter air quality impacts are not considered relevant.

#### Recommendation

We recommend that the developer provides further justification for the scoping out of air quality modelling during the construction phase.

- The developer proposes to consider impact on particulate matter air pollution levels from a fire incident. In the event of a fire a number of substances will be produced by the combustion process. Nearby residents are likely to be concerned about what is burning in the fire and what substances are likely to be produced. An air quality assessment in relation to a fire scenario should therefore identify an inventory of hazardous chemicals expected to be present on site, in terms of quantities and likely products of combustion.

#### Recommendation

We welcome the assessment of air quality impacts from a fire scenario, but recommend the developer broadens the emissions considered based on volumes of hazardous chemicals associated with the development and what they would produce when undergoing combustion.

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<sup>1</sup>  
<https://khub.net/documents/135939561/390856715/Advice+on+the+content+of+environmental+statements+accompanying+an+application+under+the+Nationally+Significant+Infrastructure+Planning+Regime.pdf/a86b5521-46cc-98e4-4cad-f81a6c58f2e2?t=1615998516658>

### Recommendation

Our position is that pollutants associated with road traffic or combustion, particularly particulate matter and oxides of nitrogen are non-threshold; i.e, an exposed population is likely to be subject to potential harm at any level and that reducing public exposure to non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards will have potential public health benefits. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure) and maximise co-benefits (such as physical exercise). We encourage their consideration during development design, environmental and health impact assessment, and development consent.

### **Electromagnetic Fields (EMFs)**

The applicant should assess the potential public health impact of EMFs arising from any electrical equipment associated with the development. Alternatively, a statement should be provide explaining why EMFs can be scoped out. For more information on how to carry out the assessment, please see the accompanying reference for details<sup>1</sup>.

### **Human Health and Wellbeing**

This section of OHIDs response, identifies the wider determinants of health and wellbeing we expect the ES to address, to demonstrate whether they are likely to give rise to significant effects. OHID has focused its approach on scoping determinants of health and wellbeing under four themes, which have been derived from an analysis of the wider determinants of health mentioned in the National Policy Statements. The four themes are:

- Access
- Traffic and Transport
- Socioeconomic
- Land Use

Having considered the submitted scoping report OHID wish to make the following specific comments and recommendations:

### **Competent Persons**

Table 1.1 list the consultancies responsible for the different chapters within the ES. There appears to be no nominated lead for the human health element, albeit this forms part of the socio-economic chapter and is contained within other chapters.

### **Recommendation**

The details for the consultancies responsible for the human health assessments should be identified.

### **Population and Human health assessment**

It is noted that population and human health will be considered within existing chapters and not form a separate chapter within the ES. Given the current knowledge of the scheme and

potential impacts this appears to be a proportionate approach. This should be kept under review as more information becomes available and a separate population and human health chapter may be justified as the assessments develop.

### **Overlapping schemes**

Paragraph 2.2.16 identifies a spatial and potentially temporal overlap with other proposed solar energy schemes, notably the cable corridors for West Burton, Gate Burton and the Cottam scheme. The scoping reports identifies the need to address this overlap within the cumulative effects assessment. Additional detail is required regarding the opportunity to reduce the individual schemes effects by co-operation during the construction phase.

### **Recommendation**

Any opportunity to reduce the individual schemes effects by co-operation during the construction phase should be investigated and reported, particularly opportunities to reduce the number or impact from cable corridors.

### **Baseline data**

The scoping report does not identify any baseline health data to support any population or human health assessment or consider local health priorities which have been identified within local Joint Strategic Needs Assessments (JSNA) or Health and Wellbeing Strategies.

### **Recommendation**

In terms of sources, we would draw your attention to the following:

- [PHE Fingertips – Area profiles with various indicators on common mental disorders \(including anxiety\) and severe mental illness which can be benchmarked with other local areas as well as regional and national data](#)
- [Office for National Statistics - Wellbeing Indicators](#)
- Range of datasets related to wellbeing available including young people's wellbeing measures, personal wellbeing estimates and loneliness rates by local authority

Advice should also be sought from the local public health team on additional local data  
Baseline data should include consideration of local health priorities.

### **Vulnerable Populations**

An approach to the identification of vulnerable populations has not been provided. The impacts on health and wellbeing and health inequalities of the scheme may have particular effect on vulnerable or disadvantaged populations, including those that fall within the list of protected characteristics.

The identification of vulnerable populations and sensitive populations should be considered.

### Recommendation

Baseline health data should be provided, which is adequate to identify any local sensitivity or specific vulnerable populations. The identification of vulnerable populations should be based on the list provided by the Welsh Health Impact Assessment Support Unit<sup>2</sup> and the International Association of Impact Assessment (IAIA)<sup>3</sup>

### **Socio-economics and health**

The scoping reports provides a general indication of the geographic scope for this chapter. The ES should provide a defined area of the geographic scope of this assessment and any variation between geographic scope between socio-economics and population and human health.

### Recommendation

The ES should provide a defined area, with justification, of the geographic scope of this assessment and any variation between geographic scope between socio-economics and population and human health.

### **Assessment of significance**

Table 2.3 identifies the degrees of significance but does not identify which will be considered to be significant for the purpose of the assessment. It is anticipated that moderate and major effects would be significant. Any deviation within individual chapters relating to population or human health should be identified and justified.

### Recommendation

The ES should identify which levels of significance in Table 2.3 are to be considered significant. It is expected that moderate and major will be considered significant.

### **Traffic and Transport**

It is noted that the IEMA GEART guidelines are to be used and as such the operational phase is to be scoped out. The remainder of the traffic and transport assessment should consider impacts on pedestrians, cyclists and any horse-riding activities.

### Recommendation

The traffic and transport assessment should include an assessment of impacts on cyclists and horse riders in addition to pedestrians as required by GEART.

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<sup>2</sup> [WHIASU \(2020\). Health Impact Assessment – A Practical Guide](#)

<sup>3</sup> Cave, B., Claßen, T., Fischer-Bonde, B., Humboldt-Dachroeden, S., Martín-Olmedo, P., Mekel, O., Pyper, R., Silva, F., Vilianni, F., Xiao, Y. 2020. Human health: Ensuring a high level of protection. A reference paper on addressing Human Health in Environmental Impact Assessment. As per EU Directive 2011/92/EU amended by 2014/52/EU. International Association for Impact Assessment and European Public Health Association.

### **Housing affordability and availability**

The scoping report does not identify the potential number of peak construction workforce, but does acknowledge non-home based workers will require local accommodation.

The size of the construction workforce could be significant, noting that the Burton Gate scoping report estimated a peak of 600 construction workers per day. The presence of significant numbers of workers could foreseeably have an impact on the local availability of affordable housing and tourist accommodation, particularly that of short-term tenancies and affordable homes for certain communities.

The cumulative effects assessment will need to consider this across the wider study area given the number of other NSIPs, but also identify the potential for any local (ward-level) effects. This may lead to a lack of affordable local accommodation for vulnerable residents with the least capacity to respond to change (for example, where there may be an overlap between construction workers seeking accommodation in the private rented sector, and people in receipt of housing benefit seeking the same lower-cost accommodation).

It should be noted the Housing Needs Assessment for Central Lincolnshire (2020)<sup>4</sup> identifies the private rented sector plays a particularly key role (between 26%-29%) in accommodating those in lower paid roles, such as customer services, caring and leisure service occupations.

### **Recommendation**

The peak numbers of construction workers and non-home based workers should be established and a proportionate assessment undertaken on the impacts for housing availability and affordability and impacts on any local services.

Any cumulative effect assessment should consider the impact on demand for housing by construction workers and the likely numbers of non-home based workers required across all schemes.

The assessment should also include potential impacts on tourist accommodation within the socio-economic assessment.

Yours sincerely

On behalf of UK Health Security Agency  
[nsipconsultations@phe.gov.uk](mailto:nsipconsultations@phe.gov.uk)

*Please mark any correspondence for the attention of National Infrastructure Planning Administration.*

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<sup>4</sup> [Housing Needs Assessment Central Lincolnshire April 2020](#)



Environmental Services

Central Operations

Temple Quay House

2 The Square

Bristol, BS1 6PN

By email: [CottamSolarProject@planninginspectorate.gov.uk](mailto:CottamSolarProject@planninginspectorate.gov.uk)

Your reference: EN010133-000007

Scoping Consultation

Dear Emily

We write in response to your letter dated 28 January 2022.

Uniper UK Limited own and operate a buried high pressure natural gas pipeline which we understand may be impacted by the Cottam Solar Project.

At this stage it is not clear from the scoping report how the project will affect Uniper's assets.

We reserve our position to comment on any of the proposals submitted by the Applicant.

Yours sincerely

Lucy Berry

Land Manager

Uniper UK Ltd

**Uniper UK Limited**  
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2300 The Crescent  
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[www.uniper.energy](http://www.uniper.energy)

Uniper UK Limited

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The Planning Inspectorate  
Environmental Services, Central Operations  
Temple Quay House  
2 The Square  
Bristol  
BS1 6PN

Your contact for this matter is:  
Russell Clarkson  
[REDACTED]@west-lindsey.gov.uk  
[REDACTED]

25 February 2022

Dear Sir/Madam

**APPLICATION REFERENCE NO: 144351**

**PROPOSAL: PINS consultation on behalf of the Secretary of State regarding information to be provided in an Environmental Statement - EN010133**

**LOCATION: Cottam Wind Farm Headstead Bank Cottam Nottinghamshire**

Thank you for your consultation request under regulation 10(6) of the EIA Regulations.

West Lindsey District Council, as a consultation body and host authority, wishes to make the following comments in regard to information to be provided with the Environmental Statement. The following comments are made, following the structure of the Environmental Impact Assessment Scoping Report prepared by Lanpro (January 2022).

### **1. Introduction (pages 4 - 7)**

We agree that the development falls under paragraph 3(a) of schedule 2. In the absence of an EIA Screening Opinion, we believe the development is likely to have significant effects on the environment, and agree with the applicant's intention that they will submit an Environmental Statement with their application (**paragraph 12.4**).

Whilst it is noted that Nottinghamshire Wildlife Trust have been consulted, the majority of the development falls within the area administered by Lincolnshire Wildlife Trust, who should be consulted (**paragraph 1.4.1**).

Consultation should include Ward members whose Ward will be affected by the development. It should include Parish Councils for whom the development falls within, or adjoins their respective Parish (**section 1.4**).

### **2. Methodology (pages 7- 12)**

The proposed methodology is broadly agreeable.

It is noted that the applicant will seek to agree a shortlist of other projects, but that this will include the “West Burton Solar Project” and “Gate Burton Solar Project” (**paragraph 2.2.15**). We agree that these should be included in any “In-combination / cumulative effects” assessment.

Paragraph 4.2.5 of NPS En-1 states 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**)”* Furthermore, PINS Advice Note 17 states at paragraph 1.4 that it relates to projects that are ‘*reasonably foreseeable*’, and that the recent High Court judgment *Pearce v Secretary of State for Business, Energy, and Industrial Strategy* [2021] EWHC 326 (Admin) considers the matter of cumulative environmental effects in detail.

It is understood that all three projects are at a similar “pre-application” stage. They are registered with the Planning Inspectorate and indicate submitting their applications by the end of 2022.

It is anticipated that the impact of the Cottam Solar Project, in combination or cumulatively with, the West Burton and Gate Burton Solar Projects is likely to be significant and it is therefore imperative that any Environmental Impact Assessment considers the cumulative effect of these three solar project NSIP schemes.

### **3. The Development Site (page 13 – 19)**

“Coates” is not identified as a village within the Central Lincolnshire Local Plan’s settlement hierarchy. It would be clearer to refer to the established settlements of Stow / Sturton by Stow (**paragraph 3.2.2**).

It is unclear what is meant by *“Initial ALC surveys of the Sites have been carried out at a reconnaissance scale.”* and how the figure of 93.2% of land at grade 3b has been derived (**paragraph 3.2.71**). The development is proposed on over 1,250ha of land within West Lindsey that is predominantly in active arable use. Detailed soil surveys undertaken by competent soil specialists (i.e. Members of the British Society of Soil Science, the British Institute of Agricultural Consultants or similar professional body) should be undertaken in accordance with Natural England guidelines.

### **4. The Development Proposal (page 20 – 30)**

We are agreeable to the suggested approach of the “Rochdale envelope” as per Advice Note 9 (**paragraph 4.1.4**). As per paragraph 4.9 of the Advice Note: *“The assessment should establish those parameters likely to result in the maximum adverse effect (the worst case scenario) and be undertaken accordingly to determine significance.”*

The ES should therefore be very clear in setting out which parameters are not yet fixed and where maximum parameters are being applied.

It should include the maximum parameters such as the maximum footprint of development, the maximum size and heights of development components and the maximum capacities for output and storage; the likely foundation design for the solar panels and their construction method e.g. if piling will be required; and the locations and voltages of overhead and underground cables.

It is noted that (**paragraphs 4.2.11-4.2.13**) that only “underground” cabling is mentioned – it is therefore presumed that “overground” cables are not being proposed. If this is not the case it must be made clear.

The construction phasing, and proposals to provide a Construction Environmental management Plan (CEMP) are noted (**section 4.3**). The ES should contain details of construction compounds, their locations and likely environmental effects during the construction phases of development.

Recognition of, and proposals to contribute towards “*ecological enhancement and opportunity areas*” identified in the Central Lincolnshire Local Plan are encouraged (**paragraph 4.4.3**).

### 5. Legislative Context and Energy Policy (page 31 – 32)

Whilst the Report recognises (**paragraph 5.4.4**) the Central Lincolnshire Local Plan (2017) and four Neighbourhood Plans, it should also recognise that the review of the Central Lincolnshire Local Plan commenced in 2019 and is now underway – weight should be given to the draft Local Plan, with greater weight the more that it advances. See <https://www.n-kesteven.gov.uk/central-lincolnshire/local-plan/>

Whilst the report recognises four Neighbourhood Plans, it is considered that all of the following should be assessed and considered, as being within, or adjacent to, the application site:

<p>Cottam 1</p> <ul style="list-style-type: none"> <li>- Sturton by Stow and Stow NP</li> <li>- Brattleby NP</li> <li>- Lea NP</li> <li>- Upton and Kexby NP</li> <li>- Ingham NP</li> </ul>	<p>Cottam 2</p> <ul style="list-style-type: none"> <li>- Corringham NP</li> <li>- Laughton NP</li> <li>- Northorpe NP</li> <li>- Willoughton NP</li> <li>- Gainsborough NP</li> <li>- Morton NP</li> <li>- Hemswell and Harpswell NP</li> <li>- Glentworth NP</li> <li>- Hemswell Cliff NP</li> </ul>	<p>Cottam 3a and 3b</p> <ul style="list-style-type: none"> <li>- Laughton NP</li> <li>- Northorpe NP</li> <li>- Scotter NP</li> <li>- Scotton NP</li> <li>- Gainsborough NP</li> <li>- Morton NP</li> <li>- Willoughton NP</li> <li>- Corringham NP</li> </ul>
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### 6. Climate Change (p33 – 36)

### 7. Landscape and Visual (p37 – 68)

It is agreed that the LVIA should follow Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3) (**paragraph 7.12**).

It is considered that a 5km study area, is generally appropriate (**paragraph 7.17**) and that it “*has been chosen as it is considered that beyond this distance based on the desk-based assessment, field work and professional judgement and experience on similar sites that even with good visibility, the Scheme would be barely perceptible in the composite landscape...*”

However, it is noted (**figure 7.1**) that this would exclude a number of visual receptors to the east of Cottam 1 and 2, which are elevated due to the presence of a limestone escarpment. This includes the villages of Grayingham / Blyborough, the Grayingham Crossroads, and the edge of Kirton in Lindsey (in North Lincolnshire). The Zone of Theoretical Visibility (ZTV) (**figure 7.9**) appears to be confined to, and does not appear to go beyond the 5km study zone – it would appear that the “views of the development may be visible” area is cut off by the study area (an arbitrary line) and would in fact extend beyond it, along the escarpment. The study area should be adapted due to local circumstances and topography and to extend further to the north-east, unless it can be shown that the site is barely perceptible – which this Scoping Report does not presently do.

(**Paragraph 7.2.2**) – The West Lindsey Local Plan 2006, was superseded in 2017 by the Central Lincolnshire Local Plan and is no longer part of the development plan. Consideration should however be given to the West Lindsey Landscape Character Assessment published in 1999 (available here: <https://www.west-lindsey.gov.uk/my-services/planning-and-building/planning-policy/evidence-base-and-monitoring/landscape-character-assessment/>) It is noted that the applicant does intend to “review” this (**paragraph 7.3.35**) and any such review should be made clear, and agreed with the Local Planning Authority.

Proposed viewpoints (**Table 7.6; figures 7.11, 7.12**) are noted. It is likely that more viewpoints should be included within the 2-5km zone, and beyond the 5km zone, along the limestone escarpment. The Local Planning Authority is currently within the process of appointing Landscape Consultants, and it is requested that the applicant continue to liaise with the Authority in order to agree final viewpoints.

## **8. Ecology and Biodiversity (p69 – 89)**

**Paragraph 8.2.2** – *“At this stage, we anticipate the locations of these elements will be refined prior to statutory consultation and submission of the DCO application. Therefore, the survey work undertaken for these elements to date is in general less advanced.”* Whilst this is noted, applying ‘Rochdale Envelope’ parameters – the ES should include and be based upon maximum parameters.

**Paragraph 8.2.10** – it is noted that Chartered Institute of Ecology and Environmental Management (CIEEM) will be followed. The Report states that *“Typical perimeter fencing is not considered to impede the movement of most mammals, although movement of deer is likely to be impacted.”* It is noted later that badgers are present on site – it therefore needs to be expanded and explained as to why these mammals will not be impeded in such a way.

It is noted to scope out the presence of dormice (**paragraph 8.2.31**), based on desk top studies. This is considered to be reasonable, unless signs of dormice (or other protected species) are identified on the site field studies.

Application of DEFRA’s biodiversity metric (v3) (**paragraph 8.3.23**) in order to assess both existing and proposed biodiversity value, is welcomed.

## **9. Hydrology, flood Risk and Drainage (p90 – 102)**

It is noted that both Flood Risk Assessments (**Paragraph 9.3.1**) and Hydrological assessments (**9.3.2**) are proposed, and that consultation with the Environment Agency, Lincolnshire County Council (Lead Local Flood Authority) and the Internal Drainage Boards (IDB's) will take place (**paragraph 9.3.5**) which is encouraged.

## **10. Ground conditions and contamination (p103 – 111)**

It is noted that limited potential sources of contamination have been identified within the solar park site and that this is proposed to be scoped out. The Environmental protection Team have reviewed and accept these findings.

## **11. Minerals (P112 – 114)**

It is noted that the site is within areas identified as Mineral safeguarding Areas (MSA). Impact is scoped out on the basis of the expected lifetime of the development. Under paragraph 4.1.1 it is noted the operational life of the development is anticipated to be around 40 years.

West Lindsey District Council is not the Minerals Planning Authority, and will therefore defer to the comments of Lincolnshire County Council in this regard.

## **12. Archaeology (p115 – 127)**

It is noted that designated heritage assets are not found within the site – but the “Thorpe Medieval settlement (NHLE 1016979)” sits immediately on the southern boundary of Cottam 1. Impact upon this designated heritage asset, including its setting, should be in scope (paragraph 12.4.1). It is noted that this is picked up by chapter 13.

## **13. Built Environment (p128 – 158)**

It is noted that eight heritage assets within the 1km zone; the Church of St Cuthbert at Brattleby within the 2km zone; and four conservation areas (Fillingham, Glentworth, Ingham and Brattleby) are proposed for assessment within the ES. These 13 heritage assets are proposed “within scope” (**paragraph 13.3.19**). “All other assets” are scoped out (**13.3.20**).

The table at **13.4.3** in the appendices, identifies 25 designated heritage assets within the 2km zone (and does not include the four conservation areas). Of which, 11 are within 1km.

Consequently – this proposes that there are 16 heritage assets within 2km of the site, including 3 assets within 1km, which are proposed to be ‘scoped out’. **Table 13.1** sets out that a number of these are “not visible from the site”. As the definition of heritage setting goes beyond direct line of sight in order to appreciate the significance of the asset, there is concern that a number of these assets are being scoped out. Certainly any where harm is identified should be included. Applying the “Rochdale envelope” scenario – the maximum impact of development should be accounted for.

## **14. Transport and Access (p159 – 170)**

Cumulative impacts (**14.7.1**) should include the Gate Burton Solar Project.

We note the low movements that would be generated during the operational phase, and do not object to this being 'scoped out' (14.9.3).

### **15. Noise and Vibration (p171 – p176)**

The proposed methodology is noted, and is largely agreeable. However, it is noted that construction vehicle trip generation is still being calculated (paragraph 14.3.9) and question therefore whether it is premature to scope out (15.4.4) road traffic noise during the construction / decommissioning periods.

### **16. Glint and Glare (p177 – p185)**

It is noted that glint and glare is proposed to be scoped out. However, the Scoping Opinion for the nearby Gate Burton Solar Park had proposed that glint and glare is covered by the ES LVIA Chapter. As a bigger site, with therefore more opportunity for glint and glare – it is recommended that a similar position is taken here.

### **17. Electromagnetic fields (p186 - 190)**

It is noted that *“The Scheme is predicted to have ‘minor’ impacts in terms of EMF at worst, based on a negligible magnitude and medium sensitivity upon surrounding receptors, and is proposed to be scoped out of the ES.”* As per paragraphs 4.2.11-4.2.13, it is noted at paragraph 17.3.14 that reference is only made to underground cables.

### **18. Light pollution (page 191)**

It is noted that, whilst light pollution will not have a specific chapter, it will be considered under the Landscape/Visual and ecology chapters.

### **19. Major Accidents and Disasters (pages 192-194)**

Whilst it is proposed not to have a standalone chapter, the risk of battery fire / explosion should be clearly addressed with the ES. It is noted that this is picked up in the Air Quality and Socio-Economic chapters.

### **20. Air Quality (p195-p202)**

We do not object to scoping out air quality during the operational phase of development.

### **21. Socio-Economics, Tourism and Recreation and Human Health (p203 – 210)**

**And**

### **22. Agricultural Circumstances (p211 – 213)**

We agree to the proposed 'scope' of the Socio-Economics... chapter (paragraph 21.4.1). We anticipate one of the most significant impacts will be the loss of agricultural land and that this is considered in a stand-alone chapter (chapter 22).

It remains unclear as to what is meant by *“initial ALC surveys of the Sites have been carried out at a reconnaissance scale and indicate that that the vast majority (93.2%) of the land proposed for development within the Cottam 1, 2 and 3 Sites comprises Grade 3b*

*agricultural land*” (paragraph 22.2.4). What surveys have taken place, and how has this figure been derived – there is no supporting data in appendix 22.

It is considered that the effect on agricultural land resource and farming is likely to be significant and must be in scope. However, we do not object to this being covered by the “Socio Economics...” chapter (**paragraph 22.4.1**).

This should include baseline site-specific data across the sites, following Natural England guidance and methodology.

Please consider the above to constitute West Lindsey District Council’s formal consultation response under reg10(6) of the EIA Regulations.

### **23. Waste; and**

### **24. Telecommunications**

It is noted that these are proposed to be scoped out.

### **25. Summary**

Subject to the detailed comments above, we are broadly agreeable to the proposed scope and methodology of the ES, as summarised at **table 25.2**. It is noted that whilst Light Pollution will be scoped out and addressed in the “Landscape and Visual” chapter – the “Landscape and Visual” chapter proposes to scope out a Lighting assessment? Agricultural circumstances should not be “scoped out” and should form a significant part of the socio-economic chapter.

Please consider the above to constitute West Lindsey District Council’s formal consultation response under reg10(6) of the EIA Regulations.

Yours sincerely,

**Russell Clarkson BA(Hons) Dip TP MRTPI**  
**On behalf of West Lindsey District Council**

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