

Cottam Solar Project

Statement of Common Ground Lincolnshire Wildlife Trust

Prepared by: Clarkson & Woods
April 2023

PINS Ref: EN010133
Document reference: EX1/C8.3.10
Infrastructure Planning (Examination Procedure) Rules 2010



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Issue Sheet

**Report Prepared for: Cottam Solar Project Ltd.
DCO Submission**

Statement of Common Ground Lincolnshire Wildlife Trust

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Date: 24th April 2023

Revision: [01]

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1 Introduction

1.1 Purpose of this document

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared as part of the proposed Cottam Solar Project Development Consent Order (the Application) made by Cottam Solar Project Ltd (The Applicant) to the Secretary of State for Energy Security and Net Zero (the Secretary of State) pursuant to the Planning Act 2008 (PA 2008).
- 1.1.2 This SoCG does not seek to replicate information which is available elsewhere within the Application documents. All documents are available on the Planning Inspectorate website.
- 1.1.3 This SoCG has been produced to confirm to the Examining Authority (ExA) where agreement has been reached between the parties, and where agreement has not (yet) been reached. SoCGs are an established means in the DCO consenting process of allowing all parties to identify and focus on specific issues that may need to be addressed during the examination.

1.2 Parties to this Statement of Common Ground

- 1.2.1 This SoCG has been prepared by (1) Cottam Solar Project Ltd as the Applicant and (2) Lincolnshire Wildlife Trust (LWT).
- 1.2.2 Collectively, Cottam Solar Project Ltd and LWT are referred to as ‘the parties’.

1.3 Terminology

- 1.3.1 In the table in the Issues chapter of this SoCG:
- “Agreed” indicates where the issue has been resolved.
 - “Not Agreed” indicates a final position, and
 - “Under discussion” indicates where these points will be the subject of ongoing discussion wherever possible to resolve, or refine, the extent of disagreement between the parties.

1.4 Topic Referencing for all matters

- 1.4.1 All matters agreed, under discussion and not agreed have been given unique references which relate to the topic matter. The referencing system is defined as follows:

Table 1.1: Topic Identifier Codes

Topic	Unique Identifying Code
Ecology and Biodiversity	ECO-XX

2 Record of Engagement

2.1 Summary of consultation

2.1.1 The parties have been engaged in consultation since the beginning of the proposed development. A summary of the meetings and correspondence that has taken place between Cottam Solar Project and LWT in relation to the Application is outlined in **Table 2.1**.

Table 2.1 - Record of Engagement

Date & Form of Correspondence	Summary of Comment/Issues Raised	Summary of Action or outcome
<p>Applicant ecologist contacted LWT on 25/11/21 to request meeting to discuss progress on Scheme and approach to baseline assessment. No meeting took place but written response received from Conservation Officer dated 15/12/21.</p>	<p>LWT provided high-level advice on the expectations for avoidance and mitigation of impact and assessment of baseline conditions. Advice based on Preliminary Ecological Appraisals (PEAs) and generic design information. This document formed part of the consultation package submitted to PINS during the EIA scoping process.</p>	<p>Biodiversity Opportunities Mapping has been considered in the location of grassland, wetland and hedgerow habitat creation in C7.3 outline Landscape and Ecological Management Plan (oLEMP) [APP-339] in order to maximise positive impact.</p> <p>Grassland management practicalities have been discussed in C7.3 oLEMP [APP-339] to maximise diversity.</p> <p>Mitigation for skylark and yellow wagtail has been put forward to reduce displacement effects in C6.2.9 Environmental Statement (ES) Chapter 9 Sections 9.7.160-9.7.181) [APP-044].</p> <p>Roadside nature reserves (LNRs) have been considered when designing new accesses – avoiding direct harm as set out in C6.2.9 ES Sections 9.7.13-9.7.42 [APP-044]</p> <p>Fencing permeability has been considered in relation to badgers and other small mammals as set out in C6.2.9ES Chapter 9 Sections 9.7.136-9.7.149 and 9.7.216-9.7.226 [APP-044]</p> <p>Lighting impacts on bats have been considered with mitigation to reduce impacts proposed during construction and operation as set out in C6.2.9 ES</p>

		<p>Chapter 9 Section 9.7.108-9.7.122 [APP-044]</p> <p>BNG has been discussed comprehensively in C6.3.9.12 Appendix 9.12 [APP-044].</p> <p>Post-construction ecological monitoring and habitat management objectives have been factored into C7.3 oLEMP [APP-339].</p>
<p>Applicant ecologist contacted Head of Conservation on 14/04/22 to discuss progress on Scheme and approach to baseline assessment of the cable routes. Telephone meeting took place 22/04/22.</p>	<p>LWT broadly satisfied with approach to ecological survey and assessment both in relation to array sites and the cable routes. LWT advised that resources were limited at LWT at the current time but would endeavour to put a response in writing in due course. No response received.</p>	<p>No action required as a result of the meeting.</p>
<p>Further request made by applicant ecologist by telephone to LWT for comment on cable route survey methodologies. Email response received 29/06/22</p>	<p>LWT confirmed by email that methods and survey scope were satisfactory.</p>	<p>No action required.</p>

2.1.2 It is agreed that this is an accurate record of the key meetings and consultation undertaken between (1) Cottam Solar Project Ltd and (2) LWT in relation to the issues addressed in this SoCG.

3 Issues

3.1 Matters Agreed

3.1.1 **Table 3.1** below details the matters agreed with LWT.

Table 3.1: Matters Agreed

Topic Ref.	Sub-topic	Stakeholder Comment	Applicant Response
ECO-01	Cable route survey scope and assessment methodologies.	LWT confirmed by email that in principle it had no major concerns with the various ecological surveys and methods proposed. LWT supported the views of Nottinghamshire Wildlife Trust in their initial response in regards to LWSs and clerk of works.	No further action necessary – matter agreed.
ECO-02	Ecological enhancement	<i>This and all subsequent comments in Table 3.1 taken from consultation response dated 15/12/21:</i> The general principles for achieving ecological enhancement on solar projects listed in paragraph 3.4.5 of the Pre-Application Technical Information are supported by LWT.	No further action necessary – matter agreed.
ECO-03	Ground nesting birds	LWT call for optimal bird habitat of sufficient size to be incorporated into layout plans as mitigation in the form of species-rich grassland among arrays which would provide additional, higher quality foraging habitat. Due to the principal potential ecological impact identified by the PEA being the available nesting territory for ground nesting birds such as skylark and yellow wagtail, LWT are	It is considered common ground as large-scale creation of diverse grassland types under/between solar panels and within buffer zones will provide optimal foraging habitat for ground nesting birds. The proposals also include several areas of open, undeveloped land within the Order Limits with the

		<p>pleased to see specific mention of the intention to provide land for skylark plots as mitigation within the proposed developments.</p>	<p>intention of being managed specifically for the benefit of nesting skylark, yellow wagtail and lapwing.</p> <p>Mitigation for skylark and yellow wagtail has been put forward to reduce displacement effects as set out in C6.2.9 ES Chapter 9 Sections 9.7.160-9.7.181[APP-044].</p>
ECO-04	Fencing	<p>LWT note that the type of security fencing proposed would be permeable for brown hare and for badgers and would be keen to see reasonable evidence of this.</p>	<p>No further action necessary – matter agreed.</p> <p>Fencing permeability has been considered in relation to badgers and other small mammals as set out in C6.2.9 ES Chapter 9 Sections 9.7.136-9.7.149 and 9.7.216-9.7.226 [APP-044].</p> <p>In addition, Clarkson and Woods have conducted ecological monitoring of over 100 operational sites and regularly encounter brown hare and badgers within the fenced area. This is evidenced through our regular report entitled ‘Solarview’ which can be provided separately.</p>
-ECO-05	Hedgerows and Trees	<p>LWT agree, based on the information available, that the principal existing ecological value (including wildlife corridor functionality) within the sites is constituted by the vegetation and drainage features of the land parcel boundaries. LWT support recommendations for hedgerow and tree retention; hedgerow enhancement with diverse, native and locally occurring species; the periodicity and method of hedgerow management and the minimum widths recommended for buffer zone creation.</p>	<p>It is considered common ground taking into account the proposed significant enhancement of hedgerows through the planting of new trees (approximately 10ha) and hedgerows at boundaries (as can be seen within C7.3 oLEMP [APP-339] and focuses on the gapping up of currently defunct hedgerows, creation of new hedgerows (approximately 20km) at boundaries where none exist, planting around Public Rights of Way and where landscape and visual impact mitigation is required. In addition, limited opportunities for the replanting of old, removed field boundaries where appropriate have been pursued.</p>

ECO-06	Habitat Creation and Management	<p>LWT support the creation of an extensive network of species-rich meadow with the ongoing site management and note that this would help realise significant biodiversity net gain. LWT support the options for species-rich grassland management and the guidance provided for establishment of species-rich grassland habitat. LWT support the requirement of a 'shade cut' to enable less frequent cutting of the remainder of grassland.</p> <p>LWT strongly support the concept of establishing a habitat mosaic within each site that would comprise structural grassland and scrub mosaic.</p> <p>LWT would recommend using 'flowering lawn' mixes in all of the 'shade cut' strips rather than 'pollen and nectar' mixes. These would be lower maintenance with a lower carbon / chemical footprint and would incorporate only native species.</p> <p>LWT support the concept of linear pond creation in the form of deepened swales and agree that this would be a key opportunity for Biodiversity Net Gain.</p>	<p>This is considered common ground. Habitat creation and ongoing management of retained, enhanced and newly created habitats have been discussed in C7.3 oLEMP [APP-339] to maximise diversity.</p>
ECO-07	Rivers	<p>LWT see a significant opportunity to enhance river water quality for wildlife and people through creation of extended buffers and a large-scale reduction in the cultivation of soil and probable agrochemical soil inputs.</p>	<p>No further action necessary – matter agreed.</p>
ECO-08	Badgers	<p>LWT agrees generally with the measures for badger mitigation proposed in the PEAs. The advice in the PEAs to avoid buried fencing to benefit badgers is supported,</p>	<p>Perimeter fencing is not considered to be a barrier to badger movement given their propensity for digging (the fencing will not be buried).</p>

		however LWT would be grateful for evidence that badger gates are unnecessary.	
ECO-09	Otter and Water Vole	<p>LWT agree with the scope for surveying otter and water vole. LWT agree that any mitigation for otter and water vole would relate to protection of river banks and margins from disturbance and damage by buffering and avoidance of pollution events and expect these to be built into CEMPs for each phase.</p> <p>LWT support the minimum watercourse buffers proposed and wider buffering where habitat is most suitable or field signs are detected as a reasonable approach.</p> <p>LWT see strong opportunities to enhance wet boundaries with native vegetation and to maintain high lit levels in the majority of watercourse sections to maintain and enhance herbaceous riparian and aquatic habitat.</p>	No further action necessary – matter agreed.
ECO-10	Great Crested Newt (GCN)	<p>LWT note the survey scope for GCN and did not express any concerns with the scope or methodologies implemented. LWT acknowledge that Natural England will be consulted concerning GCN and accept that the Low Impact Class Licence approach may be valid if sufficient populations are deemed to be taken closer to suitable habitats. LWT support the ‘Opportunities for Enhancement and Biodiversity Net Gain’ given in the PEAs with respect to GCN and would add pond creation within flood risk zones especially where these would be in close proximity to existing breeding habitat.</p>	No further action necessary – matter agreed.

ECO-11	Reptiles	LWT are supportive of the general measures proposed within the PEA for reptile mitigation.	No further action necessary – matter agreed.
ECO-12	Bats	LWT accept the assumption that arrays generally have a neutral effect on foraging and commuting bats with the potential to offer enhancement where commuting and foraging habitat can be better connected and invertebrate populations can be better supported in an arable context. LWT support general recommendations given in the PEA for mitigation by buffering field boundaries and through lighting design.	No further action necessary – matter agreed.
ECO-13	Invasive Species	LWT would support aggressive non-native invasive species control generally across all sites where encountered.	It is considered common ground. Although no invasive species have been observed to date, C7.19 outline Ecological Protection and Mitigation Strategy (oEPMS) [APP-356] will describe precautionary measures to be taken to avoid the accidental spread of these species. This includes a briefing for all construction staff on the issue to ensure vigilance for these species, as well as inspections of proposed working locations at watercourses and ditches by an ecologist prior to commencement.

3.2 Matters Under Discussion

3.2.1 **Table 3.2** below details the matters under discussion with LWT.

Table 3.2: Matters under discussion

Topic Ref.	Sub-topic	Stakeholder Comment	Applicant Response
ECO-14	Locally Designated Sites	With regard to accessibility, Draft EN-3 outlines that 'Applicants will need to consider the suitability of the access routes to the proposed site for both the construction and operation of the solar farm with the former likely to raise more issues.' LWT highlight this as being especially relevant to Roadside Nature Reserves and Local Wildlife Site designations on road verges within the vicinity of the proposed schemes.	<p>The process of finalising the Cable Route Corridor has meant that none of the LWSs will be directly affected by the cable installation. This is due either by avoiding crossing/making incursions into the LWS or, in the case of Cow Pasture Lane Drains LWS and Upton Grange Road Verges LWS, employing Horizontal Directional Drilling (HDD) to install the cables without needing to open a trench. Additionally, while the road at Upton Grange Road Verges LWS is within the access route for vehicles involved with the cable route installation, it has been confirmed that no incursion into the LWS will be necessary owing to the use of existing farm access gates.</p> <p>As set out in C6.2.9 ES Chapter 9 Section 9.5 [APP-044], C7.19 outline Ecological Protection and Mitigation Strategy (oEPMS) [APP-356] provides precautionary</p>

			measures in relation to using HDD in proximity to LWSs, and to ensure potential indirect pollution or dust deposition effects from the cable installation works in proximity to these sites are mitigated.
ECO-15	In combination effects	LWT call for a strategic approach to the potential combined impacts from the number and scale of NSIP solar farm projects will have in the area around Gainsborough.	<p>LWT acknowledge that the Cottam Project is considering its effects in tandem with the West Burton Solar project nearby, however, during the consultation process of these NSIPs, two more have been proposed in close proximity to Cottam.</p> <p>LWT are setting up an event for representatives of the solar industry later in the year to discuss combined impacts and to work with the sector towards an appropriate solution and establish best practices.</p>

3.3 Matters Not Agreed

3.3.1 **Table 3.3** below details the matters not agreed with LWT.

Table 3.3: Matters under discussion


Topic Ref.	Sub-topic	Stakeholder Comment	Applicant Response
None	Not applicable	Not applicable	Not applicable

4 Signatories

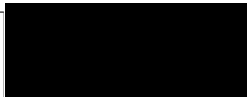
4.1 Overview

4.1.1 The above SoCG is agreed between Cottam Solar Project Ltd. (the Applicant) and **Lincolnshire Wildlife Trust**, as specified below.

Duly authorised for and on behalf of **Cottam Solar Project Ltd.**

Name:	Eve Browning
Job Title:	Senior Project Development Manager
Date:	04/10/2023
Signature:	

Duly authorised for and on behalf of **Lincolnshire Wildlife Trust**

Name:	Ashley Reaney
Job Title:	Conservation Officer
Date:	17/08/2023
Signature:	
Name:	
Job Title:	
Date:	
Signature:	