Cottam Solar Project

Written Summary of the Applicant's Oral Submissions & Responses at Open Floor Hearing 1

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Cottam
SOLAR PROJECT

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Issue Sheet

Report Prepared for: Cottam Solar Project Ltd
Examination Deadline 1

Written Summary of the Applicant's Oral Submissions & Responses at Open Floor Hearing 1

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1 Introduction and Summary

1.1 Purpose of this document

1.1.1 This document provides Cottam Solar Project Limited (the 'Applicant's') response to oral submissions made by Interested Parties, host local authorities, and statutory consultees at the first Open Floor Hearing (OFH1) relating to the Development Consent Order Application (the 'Application') for Cottam Solar Project (the 'Scheme'). OFH1 was undertaken during the afternoon of 5 September 2023.

1.1.2 A total of 14 oral submissions were made at OFH1 by Interested Parties in response to Item 4 of to the Examining Authority's (ExA) Open Floor Hearing 1 Agenda **[EV-003]**.

1.2 Structure of the Report

1.2.1 This document provides a written response from the Applicant to those matters raised during OFH1:

- Section 2 provides a summary of the Applicant's Oral Submissions at OFH1; and
- Section 3 provides the Applicant's responses to Oral Submissions made at OFH1.

1.2 Further information relating to the matters raised at OFH1 can be found in the Applicant's Response to Relevant Representations submitted at Deadline 1 **[EN010133/EX1/C8.1.2]**.

2 Summary of the Applicant's Oral Submissions at OFH1

2.1.1 Ms Claire Brodrick of Pinsent Masons LLP responded to these submissions on behalf of the Applicant. She firstly thanked all participants for attending and explained that the Applicant would be responding to the large number of clear and detailed submissions in writing, including responding to the relevant representations, at Deadline 1.

2.1.2 She explained that the Applicant appreciated that the DCO application consists of a large volume of material and noted that a wide range of questions had been asked. Where answers are contained within the DCO application documents, the Applicant would provide clear cross references so that Interested Parties could easily locate the information. Ms Brodrick further stated that the Applicant would respond in detail to questions relating to specific land parcels at Deadline 1.

2.1.3 Ms Brodrick explained that the Applicant did not have time to respond to all of the points raised by Interested Parties in detail, for example, a number of the submissions included detailed technical information regarding the role of utility scale solar projects in decarbonisation and achieving net zero, the efficiency of solar generation and food security. Ms Brodrick noted that a number of the submissions related to the role of the Cottam Solar Project and the interrelationship with other solar projects in Lincolnshire. Ms Brodrick confirmed that the Applicant would respond to the points raised in writing at Deadline 1.

2.1.4 Ms Brodrick flagged that the draft DCO is a statutory instrument which contains a wide range of powers and limitations, including the use of outline plans and requirements. Where points have been raised about scope and impacts, the Applicant will set out where limitations already exist – for instance, in relation to the removal of hedgerows, the Applicant will set out in its written response how limitations will restrict the ability to remove hedgerows. She further stated, however, that there is a need to microsite at the detailed design phase, as a wider area is included at the current stage. Ms Brodrick explained that whilst the point might arise again at ISH1, the Applicant wanted to reiterate that it is important not to look at anything in isolation and the Applicant will try to ensure this is clear in its responses.

3 The Applicant's Responses to Oral Submissions to OFH1

3.1 Carol Gilbert (on behalf of Sturton by Stow Parish Council)

Reference	Theme	Summary of issue raised	Applicant's Response
CGi-01	Cumulative Development DCO process	Ms Gilbert raised concerns about the size of the scheme, particularly when combined with others locally, as well as the lack of expertise of locals. She stated that use of the Rochdale envelope approach should not preclude the creation of detailed plans containing more specific information.	Section 3.3 of document **C7.11 Statement of Need [APP-350]**, specifically paragraphs 3.3.2, 3.3.5 and 3.3.11, describes the Government's view that large capacities of low-carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar". This support for large scale solar as part of the 'answer' to net zero and energy security has been repeated in its recent policy documents published in March 2023. Section 7.5 of **C7.11 Statement of Need [APP-350]** describes how suitable locations for large-scale solar are identified and assessed. Paragraph 7.5.2 outlines the broad criteria for determining Site suitability. Figure 7.4 shows the level of photovoltaic power potential at the proposed location. Section 9 describes the advantages of connecting large-scale solar to the existing and robust National Electricity Transmission System at the proposed Point of Connection at Cottam Power Station, and Paragraph 9.4.4 concludes that the Proposed Development will contribute to national system adequacy and decarbonisation targets.

Reference	Theme	Summary of issue raised	Applicant's Response
			C6.2.5 ES Chapter 5 Alternatives and Design Evolution [APP-040] and its accompanying appendix **C6.3.5.1 ES Appendix 5.1 Site Selection Assessment [APP-067]** explain how the site was chosen in light of that need. Specifically, paragraph 2.1.10 of **C6.3.5.1 ES Appendix 5.1 Site Selection Assessment [APP-067]** explains the reasons why a site of the size proposed is required to meet the 600MW grid connection offer. The methodology used for the site selection process is considered reasonable and proportionate and complies with the requirements of NPS EN-1 4.4.3 as explained at Section 2.1 **[APP-067]**. The Applicant notes this comment and seeks to assure the Party that a cumulative effects assessment has been prepared for the Application within the **Environmental Statement [APP-036 to APP-058].** Cumulative effects assessments for each topic are set out in each of the ES Chapters and include the assessment of the impacts of the Scheme cumulatively with the NSIPs identified by WLDC (Gate Burton Energy Park, West Burton Solar Project and Tillbridge Solar Project) (see paragraph 2.5.9 of **C6.2.2 ES Chapter 2 EIA Process and Methodology [APP-037]**. This assessment is in accordance with Schedule 4 of the 2017 EIA Regulations and PINS Advice Note 17. The mitigation measures set out across the ES therefore account for anticipated cumulative effects. The Applicant acknowledges that an Application seeking a Development Consent Order is technical in nature. The

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			Applicant points the Party, and members of the public more broadly, to **C6.5_A ES Non-Technical Summary Revision A [EN010133/EX1/C6.5_A]** which provides a non-technical summary of the Environmental Statement. The Applicant confirms that following further development of the Scheme, details of areas in which there is proposed to be hardstanding will be developed during the detailed design process.
CGi-02	General	1. Will this development be sold on before it gets to the developmental stage?	Paragraph 2.2.3 of **C4.2 Funding Statement [APP-019]** states that, should development consent be granted for the Scheme, Island Green Power would seek further funding with the support of its legal and financial advisors, as is common in privately funded infrastructure projects. Article 34 of the draft DCO (submitted at Deadline 1) states that the DCO is solely for the benefit of the Applicant. If the Applicant wished to transfer the Scheme to another entity it would need to get consent from the Secretary of State in accordance with Article 35 of the draft DCO unless a number of limited exceptions applied.
CGi-03	Scheme Description	2. How many solar panels are forecasted to be used?	Paragraph 7.8.15 of ES Chapter 7 Climate Change **[EN010133/EX1/C6.2.7_A]** states that Option A would require 1,320,624 solar PV modules whilst Option B would require 1,307,496 solar PV modules. Options A and B reflect the two options for the area(s) required for energy storage where Option B is for the larger energy storage facility.

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CGi-04	Maintenance	3. What is the rate of failure of panels and expected replacement timings, as this will affect traffic throughout the duration of project?	Paragraph 7.8.60 of ES Chapter 7 Climate Change **[EN010133/EX1/C6.2.7_A]** assumes a 0.04% degradation rate (per annum) for each year after year one whilst year 1 assumes a degradation rate of 1%. Paragraph 14.7.70 of ES Chapter 14 Transport and Access **[EN010133/EX1/C6.2.14_A]** states that there are anticipated to be around five visits to each Site per month for maintenance purposes which would typically be made by light van or 4x4 type vehicles. In light of this, the operational transport effects are considered to be negligible and not significant.
CGi-05	General	4. Where will the panels be manufactured?	At present, the exact location of panel manufacture is not known. However, as stated within paragraph 7.5.4 of ES Chapter 7 Climate Change **[EN010133/EX1/C6.2.7_A]**, it is anticipated that PV panels will be sourced from China or a country of similar distance from the UK.
CGi-06	Climate Change	5. Has the carbon that will be produced during the mining of minerals, the manufacture and transport actually been accounted for against energy generation?	The embodied carbon in the production of the materials and products to be used on site accounts for the extraction, manufacturing, transportation and installation of all equipment through use of the ICE database and Greenhouse Gas Emissions Factors from the UK Government Department for Energy Security and Net Zero and Department for Environment, Food and Rural Affairs.
CGi-07	Human Health	Ms Gilbert raised mental health concerns for residents.	**C6.2.8 ES Chapter 8 Landscape and Visual Impact Assessment [APP-043]** (the 'LVIA') looks to provide landscape mitigation that seeks to enhance the landscape character of the Study Area and to reduce the visibility of

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			the Scheme from residential properties and other public vantage points including transport routes, public footpaths, permissive footpaths and green lane network. This mitigation is aimed to benefit the community as a whole to enhance their way of life as well as green infrastructure (see paras. 8.1.1 and 8.8.3). Public consultation has also taken account of landscape and visual matters (see paras. 8.2.8 and 8.4.20). The landscape mitigation measures seek to provide new planting to mitigation the potential impacts and effects of glint and glare (see paras. 8.2.10, 8.4.44, 8.8.8, 8.9.19 and 8.9.20). The Applicant notes this comment. The Applicant is cognisant of the significance of the countryside for physical and mental wellbeing and, as such, likely impacts on the desirability and use of recreational facilities in the countryside, such as public rights of way, have been assessed in Section 18.7 of **C6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-053]**. The greatest level of effect to access, desirability and use of recreational facilities is moderate-minor adverse and is anticipated during construction (para. 18.7.60-67) and decommissioning (para. 18.7.143-153). These effects are not anticipated to be significant. This is re-iterated in Section 21.5 of **C6.2.21 ES Chapter 21 Other Environmental Matters [APP-056]**.
CGi-08	DCO Drafting	6. There does not appear to be an upper limit on generation in the DCO itself – why is this?	The Applicant had not included an upper limit for the generating capacity of the solar PV panels in the DCO. An

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			upper limit is not deemed necessary for planning purposes and means that the Applicant will be able to take advantage of any technological improvements that may arrive prior to construction which enable increases the MW output of the Scheme. It is noted that the Scheme must be constructed, operated, and maintained in accordance with the fixed parameters (e.g. relating to size and external appearance) that have been assessed in the Environmental Statement **[APP-036 to APP-058]**. For further details, please see paragraph 1.4.4 of the Explanatory Memorandum **[APP-017]** which set out the justification for this approach.
CGi-09	Scheme Description Energy Need	7. What is the actual capacity needed in order to generate 600MW? (She stated that she assumes there will have to be steps up and down in generation – 6% differential)	The Scheme has a grid connection offer of 600MW, which caps the rate at which energy can be exported to the National Grid. The Scheme is designed to be overplanted by up to 30% (the concept of overplanting is referred to in Section 7.7 of **C7.11 Statement of Need [APP-350]**) to maximise the lifetime generation from the Scheme.. As such, the installed capacity of the Scheme may be as high as approximately 780MWp, although this figure is provided as an illustration only and the Applicant is not proposing a limit to the capacity of the Scheme. The Applicant recognises that there will be some internal system losses, including those resulting from stepping up to 400kV for the grid connection, however system losses are normal for generators and the detailed design process seeks to minimise them. Stepping up voltage before transmission at 400kV reduces losses associated with the

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			onward transmission of energy through the National Electricity Transmission System.
CGi-10	Maintenance	8. Can the use of sheep grazing for grass management be dismissed from the written documents considering there are four large schemes where one of these Schemes has already mentioned the lack of sheep and facilities?	Grazing is viable in solar farms as demonstrated by existing solar farms being grazed by sheep. Please see BRE (2014) '*Agricultural Good Practice Guidance for Solar Farms.*' Ed J Scurlock. A solar farm of this scale also presents an opportunity to establish a new sheep grazing enterprise even if an existing enterprise is not already present in the vicinity.
CGi-11	Light Pollution	Ms Gilbert raised concerns about white light being used and therefore affecting the surrounding area and ecology, as the rural setting has no background light pollution.	As stated within paragraph 2.6.1 of **C7.1_A Outline Construction Environmental Management Plan [EN010133/EX1/C7.1_A],** lighting (during construction) will be required for safety reasons but will be temporary in nature and predominately limited to the core working hours. Provision of a detailed CEMP has been secured by Requirement 13 of Schedule 2 of **C3.1_B Draft Development Consent Order Revision B [EN010133/EX1/C3.1_B].** Paragraph 2.5.1 of **C7.16 Outline Operational Environmental Management Plan [APP-353]**, notes that no part of the Scheme will be continuously lit and that the use of motion detection security lighting will avoid permanent lighting. Lighting is not required within the solar arrays. Lighting will be provided within substations and within the Energy

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			Storage site to be used only in the event of it being required for maintenance and security purposes. Down lighting would be used on lighting columns of a maximum height of 3m. An assessment of potential impacts upon protected species and Important Ecological Features has been set out in paragraphs 9.7.105 – 9.7.241 of **C6.2.9 ES Chapter 9: Ecology and Biodiversity [APP-044].** It is considered that, since the construction and operation of the Scheme will cause little or no impediment or behaviour of the majority of species and that artificial lighting is not to be implemented as part of the proposals, the potential for nocturnality or diurnality impacts is negligible.
CGi-12	DCO Drafting	9. Why is there no time limit in the DCO for operation of the scheme?	In response to concerns raised by the Examining Authority and interested parties regarding the Scheme being in place in perpetuity, the Applicant has amended Requirement 21 of Schedule 2 to the draft DCO submitted at Deadline 1 to require the Scheme to be decommissioned after 60 years. Paragraph 3.10.137 of draft NPS EN-3 states that the Secretary of State should ensure that outline plans for decommissioning the generating station and restoring the land have been put forward. An outline decommissioning statement forms part of the DCO application documents **[APP-338]** and decommissioning is secured by Requirement 21 of the DCO.

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			Requirement 21 now states that *"The date of decommissioning must be no later than 60 years following the date of final commissioning"*.
CGi-13	DCO Drafting	10. Where will blasting be needed (Schedule 10, article 22; DCO p78)?	Schedule 10, Article 22 of **C3.1_B Draft Development Consent Order Revision B [EN010133/EX1/C3.1_B]** makes reference to land in which only new rights etc. may be acquired and restrictive covenants imposed. The rights seek to *"restrict and remove the erection of buildings or structures, restrict the altering of ground levels, restrict and remove the planting of trees or carrying out operations or actions (including but not limited to blasting and piling) which may obstruct, interrupt or interfere with the exercise of the rights or damage the authorised development."* By this, it is meant that the DCO seeks to prevent third parties from carrying out any blasting and pilling which may interfere with or damage the authorised development. The Scheme does not require any blasting.
CGi-14	Transport	Ms Gilbert also raised traffic issues relating to: • B1241 being a main access route despite being very narrow and having cars parked / single lane at school collection time; • Movement of long transformers and cable drums around bends on B1241 passing the listed St Mary's Church;	A small number of HGVs associated with the construction of Cottam 1 West will use the B1241. Table 6.3 of the **C6.3.14.1 ES Appendix 14.1 Transport Assessment [APP-134]** indicates that this will be as low as two HGVs per day on average. Paragraph 6.24 of the Transport Assessment states *"As this route is through the settlements of Stow and Sturton by Stow, smaller vehicles will be used to deliver equipment to these accesses. Again, HGV movement will be managed via a booking system".*

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		• Movements of AILs off the A1500 and onto the B141 may require highways reconfiguration; and • Traffic passing along B1241 past the primary school has not been included in the safety and delay assessment (Chapter 14, Appendix 14.2). Why is that?	All construction vehicle movements will be managed through the **C6.3.14.2_A ES Appendix 14.2 Outline Construction Traffic Management Plan EN010133/EX1/C6.3.14.2_A]** which is secured by Requirement 15 in Schedule 2 to the draft DCO**.** Abnormal load movements will all be escorted and will be subject to careful traffic management, which will be agreed with Lincolnshire Police (see paragraph 6.10 of the CTMP). Abnormal load specialists 'Wynns' have prepared a report detailing the required movements and management measures. This also includes swept path analysis of the vehicle movements. This is shown in Appendix F of the **C6.3.14.1 ES Appendix 14.1 Transport Assessment [APP-134]** and summarised in Section 7 of the Transport Assessment.

3.2 Margaret O'Grady (on behalf of Fillingham Parish Meeting)

Reference	Theme	Summary of issue raised	Applicant's Response
MOG-01	Principle of Development	Ms O'Grady principally raised concerns about the size and nature of the scheme affecting the rural landscape and the loss of farmland for food production.	Section 3.3 of document **C7.11 Statement of Need [APP-350]**, specifically paragraphs 3.3.2, 3.3.5 and 3.3.11, describes the Government's view that large capacities of low-carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that *"a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar"*. This support for large scale solar as part of the 'answer' to net zero and energy security has been repeated in its recent policy documents published in March 2023. **C6.2.8 ES Chapter 8 Landscape and Visual Impact [APP-043]** includes a full and detailed assessment that deals with both effects on the landscape itself and effects on the visual amenity of people, as well as interrelationships of these with other related topics in the ES. The LVIA process is iterative and as a result, the design of the Scheme has changed to respond to the findings of the assessment to ensure that landscape mitigation is fully considered as part of the process. For example, within the Cottam 1 Site, the PRoW bridleway (Fill/86/1) leads from Short Lane (at the settlement of Ingham) to join with PRoW footpath (Ingh/17/1), then eventually joins with Willingham Road. As a result of the Scheme, the foreground of the view would change from a large, gently sloping arable field to an area of panels. This is set out in **C6.3.8.3 ES Appendix 8.3 Assessment of Potential Visual Effects includes 8.3.1 -**

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			8.3.5 [APP-075] on sheet [EN010133/APP/C6.3.8.3.5.2.1] Public Rights of Way Receptor – Fill/86 (Fill/86/1) and on sheet [EN010133/APP/C6.3.8.3.2.3.19]. In this instance (Sheet C6.3.8.3.5.2.1 page 1), the Embedded Mitigation would include panels set a minimum of 15m from the adjacent PRoW. Existing hedges would also be allowed to grow out and will be managed to a height of 5m. Hedgerow trees will be encouraged to grow out to add further thickening and growth to the field boundaries with the addition of new hedgerow trees as appropriate, randomly spaced along the length of the existing hedges at close range. Furthermore (Sheet C6.3.8.3.2.3.19 on page 3), in the middle distance, new and augmented hedgerows will provide a series of strong field boundaries both formally strengthening the existing and historical field pattern and also in creating a multi-layered landscape. The LVIA considers that for some aspects of the Scheme (the construction phase in particular), the presence of the panels has been assessed to result in an adverse effect. Where impacts and effects are identified then landscape mitigation measures are applied to offset or remedy any adverse effects. Where the LVIA has identified significant adverse effects, extensive landscape mitigation is set out in **C7.3 Outline Landscape and Ecological Management Plan (LEMP) [APP-339]** and is also shown on **C6.4.8.16.1 - C6.4.8.16.10 Landscape and Ecology Mitigation and Enhancement Plans (Figures 8.16.1 to 8.16.10) [APP-301 to APP-315]**.

Reference	Theme	Summary of issue raised	Applicant's Response
			This mitigation seeks to visually enhance the landscape through the addition of new planting and the positive management of the existing tree and hedgerow stock. This mitigation also seeks to reduce the visibility of the Scheme and help with its assimilation into the landscape from public vantage points including transport routes, public footpaths, permissive footpaths and green lane networks. This mitigation is aimed to benefit the community as a whole as well as tourists, visiting walkers, local residents, ornithologists and cyclists. The landscape mitigation measures will provide new planting, which will include new native hedgerows and tree cover, and this will also include their management and maintenance. The Applicant does not consider that the Scheme would result in food security impacts either alone or cumulatively. The UK annual balance of domestically produced food is sensitive to non-planning factors including weather and markets. The relevant assessment for policy purposes (and therefore decision-making purposes under the Planning Act 2008) is one that is based on the grade of the agricultural land, rather than its current use and the intensity of that use. In terms of key threats to UK food security, the Defra UK Food Security Report highlights that the main threat is climate change. As noted in **C6.2.19 ES Chapter 19 Soils and Agriculture [APP-054]** paragraph 19.5.2, there are no food security policy constraints on the use of agricultural land for solar power development.

Reference	Theme	Summary of issue raised	Applicant's Response
MO2-02	Principle of Development Alternatives and Design Evolution	1. Why are solar panels are not being installed on top of buildings instead?	Paragraphs 2.1.23 to 2.1.32 of **C6.3.5.1 ES Appendix 5.1 Site Selection Assessment [APP-067]** detail the consideration of brownfield land and roof tops and sets out why these were discounted as unsuitable for electricity generation of this scale. Section 3.3 of document **C7.11 Statement of Need [APP-350]**, specifically paragraphs 3.3.2, 3.3.5 and 3.3.11, describes the Government's view that large capacities of low-carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar". This support for large scale solar as part of the 'answer' to net zero and energy security has been repeated in its recent policy documents published in March 2023. Paragraph 7.6.3 of **C7.11 Statement of Need [APP-350]** analyses the potential contribution of "brownfield" solar sites to the national need for solar generation. Brownfield sites, including rooftop and other community energy systems, are likely to grow in the UK and will make a contribution to decarbonisation of the UK energy system. However, **C7.11 Statement of Need [APP-350]** concludes in Section 7.6, that on their own, brownfield developments are unlikely to be able to meet the national need for solar.

3.3 Elizabeth Garbutt (on behalf of 7000 Acres)

Reference	Theme	Summary of issue raised	Applicant's Response
EGa-01	Energy Need	1. What is the specific need for large-scale land mounted solar in the UK? (With particular reference to why rooftops cannot be used, e.g., of warehouses)	Section 3.3 of document **C7.11 Statement of Need [APP-350]**, specifically paragraphs 3.3.2, 3.3.5 and 3.3.11, describes the Government's view that large capacities of low-carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar". This support for large scale solar as part of the 'answer' to net zero and energy security has been repeated in its recent policy documents published in March 2023. Paragraph 7.6.3 of **C7.11 Statement of Need [APP-350]** analyses the potential contribution of "brownfield" solar sites to the national need for solar generation. Brownfield sites, including rooftop and other community energy systems, are likely to grow in the UK and will make a contribution to decarbonisation of the UK energy system. However, **C7.11 Statement of Need [APP-350]** concludes in Section 7.6, that on their own, brownfield developments are unlikely to be able to meet the national need for solar. Paragraph 8.5.10 and Section 8.5 more generally of **C7.11 Statement of Need [APP-350]** describe and express agreement with Government's view that decentralised and community energy systems are unlikely to lead to the significant replacement of large-scale infrastructure. The Applicant therefore supports Government's view that large

Reference	Theme	Summary of issue raised	Applicant's Response
			scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.
EGa-02	Energy Need	Ms Garbutt stated that solar schemes do not have the capacity or consistency to meet demand, leading to waste in summer and insufficient supply in winter.	Section 3.3 of **C7.11 Statement of Need [APP-350]** describes Government's view that large capacities of low-carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that *"a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar"*. Figure 8.2 and related text of **C7.11 Statement of Need [APP-250]** provides an illustration of how solar, wind and other baseload technologies, may work together to meet average demand levels through the year. Furthermore, the March 2023 revised Draft NPS EN-1 sets out the emerging policy position in favour of Battery Energy Storage Systems, at para 3.3.25: *"Storage has a key role to play in achieving net zero and providing flexibility to the energy system, so that high volumes of low carbon power, heat and transport can be integrated."* The Scheme includes proposals for a BESS which will support the solar PV generating station and work as part of a national electricity supply system to store energy at times when it is not needed, to make it available at times when it is needed.
EGa-03	Energy Need	2. To what extent can the proposed solar scheme truly contribute to the decarbonisation of the electricity system?	Section 6.2 of **C7.5 Planning Statement [APP-341]** sets out how the Scheme will meet the compelling need for

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		(Through an assessment of the role, what it can contribute and potential problems for the future decarbonised energy system).	renewable energy in accordance with relevant national planning policies. In summary, the Scheme would: • Deliver a large amount of renewable generation capacity (35,590,658 MWh over the estimated 40-year assessed lifetime) to deliver the Government's energy objectives and legally binding net zero commitments in line with the requirements of paragraph 1.1.1 of NPS EN-3, paragraph 3.3.21 of draft NPS EN-1, section 3.4 of NPS EN-1 and the National Infrastructure Strategy 2020 (para. 6.2.32); • Deliver a reduction of 5,974,155 tCO2e over the lifetime of the Scheme compared to if it did not go ahead which would make a significant contribution towards reducing carbon emissions as required by paragraph 1.1.1 of NPS EN-1, paragraph 2.3.2 of Draft NPS EN-1, the National Infrastructure Strategy 2020 and the Energy White Paper: "Powering our net zero future" (para. 6.2.35); and • Deliver in a timescale that is short in the context of the delivery of other forms of energy generation in line with the urgent need to decarbonise set out in paragraphs 3.3.5, 3.3.15 and 3.4.5 of NPS EN-1, Paragraph 2.3.2 of Draft NPS EN-1 and the National Infrastructure Strategy 2020 (paras. 6.2.1, 6.2.4 and 6.2.8).

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EGa-04	Principle of Development Alternatives and Design Evolution	Ms Garbutt stated that solar power took significant space with little generation and was therefore inefficient. She further raised the position of delivering solar on rooftops.	Table 7.1 of **C7.11 Statement of Need [APP-350]** shows the electricity generated per hectare by different low-carbon technologies. At the UK's average solar load factor (11%), solar generation produces much more energy per hectare than biogas, and generates a similar amount of energy as onshore wind. Paragraph 7.6.3 of **C7.11 Statement of Need [APP-350]** analyses the potential contribution of "brownfield" solar sites to the national need for solar generation. Brownfield sites, including rooftop and other community energy systems, are likely to grow in the UK and will make a contribution to decarbonisation of the UK energy system. However, **C7.11 Statement of Need [APP-350]** concludes in Section 7.6, that on their own, brownfield developments are unlikely to be able to meet the national need for solar. Paragraph 8.5.10 and Section 8.5 more generally of **C7.11 Statement of Need [APP-350]** describe and express agreement with Government's view that decentralised and community energy systems are unlikely to lead to the significant replacement of large-scale infrastructure. The Applicant therefore supports Government's view that large scale solar must be deployed alongside rooftop solar, to meet the urgent national need for low-carbon electricity generation.
EGa-05	Soils and Agriculture	3. What are the impacts of the scheme on the immediate area and on a macro level of considering the sustainability impact of consuming crop land at this scale?	**C6.2.8 ES Chapter 8 Landscape and Visual Impact Assessment [APP-043]** (the 'LVIA') considers both the landscape and visual effects of the Scheme, including the

Reference	Theme	Summary of issue raised	Applicant's Response
			proximity to people's houses to ensure the impacts and effects on the views and visibility are taken into account (see paragraphs 8.4.28 to 8.4.32). This includes singular buildings, groups of buildings and towns or villages. Table 8.15 of the LVIA sets out the selection of initial residential receptors for the purpose of the assessment and the reason for their selection are those receptors within the 1km Study Area for the Scheme and the 0.5km Study Area from the outer boundary of the Cable Route Corridor (see para. 8.4.12). The detailed analysis is set out at **C6.3.8.3 ES Appendix 8.3 Assessment of Potential Visual Effects [APP-075]**. Mitigation, including offsets and planting, has been proposed to address and minimise adverse effects on the character of the landscape and promote wildlife conservation. This is in line with the agreed methodology and the hierarchy of approach advocated by the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition and matters agreed with LCC at the series of workshops set out in **C6.3.8.4 ES Appendix 8.4 Consultation [APP-076]**. For example, in respect to the settlement of Sturton by Stow, which is located approximately 4km to the east of Marton, the assessment has taken account of the 50m off set from residential properties to ensure the best possible fit with their setting. The photography and photomontage

Reference	Theme	Summary of issue raised	Applicant's Response
			information at **ES Figures 8.14.1 [APP-199] to 8.14.90 [APP-288]** shows how the proposed landscape mitigation will play a key role in making sure the panels are comfortably accommodated. For example, **ES Figure 8.14.5 [APP-203]** and **8.14.23 [APP-221]** show the fencing and panels set back from residential properties, the public highway and also from the existing hedgerows to allow for their proposed thickening and growth. The photomontages also show how the planting mitigation has been designed with improvements to existing hedgerows and new hedgerows and tree belts. The Overarching National Policy Statement for Energy (EN-1), through paragraph 4.9.2, notes that hotter and dryer summers are predicted, as are wetter winters. The land is predominantly limited to grade by soil wetness and workability, whereby there are limited opportunities to cultivate clayey and poorly drained land in the spring and autumn without causing soil degradation (See paragraphs 5.1.2 and 5.1.3 of **C6.3.19.1 ES Appendix 19.1 Agricultural Land Quality Soil Resources and Farming Circumstances [APP-145]**).The Applicant does not consider that the Scheme would result in food security impacts either alone or cumulatively. The UK annual balance of domestically produced food is sensitive to non-planning factors including weather and markets. The relevant assessment for policy purposes (and therefore decision-making purposes under the Planning Act 2008) is one that is based on the grade of

Reference	Theme	Summary of issue raised	Applicant's Response
			the agricultural land, rather than its current use and the intensity of that use. In terms of key threats to UK food security, the Defra UK Food Security Report highlights that the main threat is climate change. As noted in **C6.2.19 ES Chapter 19 Soils and Agriculture [APP-054]** paragraph 19.5.2, there are no food security policy constraints on the use of agricultural land for solar power development.
EGa-06	Cumulative Development	Ms Garbutt stated that the issues are compounded by the number of other schemes and requested that the developer does not over-simplify the benefits of the scheme.	The Applicant notes this comment. The Applicant has deployed specialists to duly assess the Scheme across a broad range of topics, via the **Environmental Statement [APP-036 to APP-058]**, throughout the Scheme's lifetime from construction, through operation, and to and beyond decommissioning. The deployment of competent experts to prepare the environmental statement is a requirement of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (see Regulation 18 (5)(a)). As such, the Applicant does not consider that the assessment nor the resulting benefits have been simplified. To this end, Section 6.2 of **C7.5 Planning Statement [APP-341]** sets out how the Scheme will meet the compelling need for renewable energy in accordance with relevant national planning policies. In summary, the Scheme would: • Deliver a large amount of renewable generation capacity (35,590,658 MWh over the estimated 40-year assessed lifetime) (see para. 6.2.32) to deliver the Government's energy objectives and legally binding net

Reference	Theme	Summary of issue raised	Applicant's Response
			zero commitments in line with the requirements of paragraph 1.1.1 of NPS EN-3 (see para. 6.2.3), paragraph 3.3.21 of draft NPS EN-1 (see para. 6.2.10), section 3.4 of NPS EN-1 and the National Infrastructure Strategy 2020; • Deliver a reduction of 5,974,155 tCO2e over the lifetime of the Scheme compared to if it did not go ahead (see para. 6.2.35) which would make a significant contribution towards reducing carbon emissions as required by paragraph 1.1.1 of NPS EN-1, paragraph 2.3.2 of Draft NPS EN-1, the National Infrastructure Strategy 2020 and the Energy White Paper: "Powering our net zero future"; • Deliver in a timescale that is short in the context of the delivery of other forms of energy generation in line with the urgent need to decarbonise set out in paragraphs 3.3.5, 3.3.15 (see para. 6.2.4) and 3.4.5 of NPS EN-1 (see para. 6.2.1), Paragraph 2.3.2 (see para. 6.2.8) of Draft NPS EN-1 and the National Infrastructure Strategy 2020; • Enable all consumers to benefit from the effect of low-marginal cost solar generation on reducing market prices, in line with the aim to provide affordable energy for consumers set out at Paragraph 2.3.2, Paragraph 2.3.5 and 3.3.21 of Draft NPS EN-1 (see paras. 6.2.8, 6.2.9 and 6.2.10) ; and

Reference	Theme	Summary of issue raised	Applicant's Response
			• Help ensure security and reliability of energy supply in line with Paragraph 2.3.2 and 2.3.5 of the Draft NPS EN-1. NPS EN-1 paragraph 3.2.3. and Draft NPS EN-1 paragraph 3.1.1 acknowledge that it will not be possible to develop the necessary amounts of such infrastructure to deliver these benefits without some significant residual adverse impacts as explained at paragraph 6.2.20 of **C7.5 Planning Statement [APP-341].** Whilst it has not been possible for the Scheme to avoid all significant residual impacts, these have been identified within **the Environmental Statement [APP-036 to APP-058]** and have been minimised, where possible, through careful and sensitive design and detailed mitigation strategies.

3.4 Clare Ella

Reference	Theme	Summary of issue raised	Applicant's Response
CEl-01	BESS safety Waste Human Health	Ms Ella raised concerns about battery safety, transportation of materials and the non-recyclability of units on decommissioning. She also stated that she felt all four solar schemes in the area should be considered as one and particularly flagged mental health reasons.	Human health and other environmental impacts resulting from plumes from potential battery fires have been assessed in **C6.2.17 ES Chapter 17 Air Quality [APP-052].** Additional modelling assessment is being undertaken following further consultation with the UK Health Security Agency (UKHSA) which will be carried out using AERMOD dispersion model software to determine pollutant levels of NO2, Benzene, HCl, HF, and Particulate Matter (PM10 and PM2.5) and their potential impacts. **ES Addendum: Air Quality Impact Assessment of Battery Energy Storage Systems (BESS) Fire [EN010133/EX1/C8.4.17.2]** provides details of further modelling assessment that has been undertaken following consultation with the UK Health Security Agency regarding potential Battery Energy Storage System (BESS) fires, . The risk to human health as a result of fires or unconfined explosions within the BESS compound is set out in paragraphs 21.6.40 to 21.6.47 of **C6.2.21 ES Chapter 21 Other Environmental Matters [APP-056]** which concludes that there is no significant risk of harm to human health due to the physical separation of the BESS compound from publicly accessible areas. The Applicant notes this comment and refers the Party to paragraph 7.5.4 of **C6.2.7 ES Chapter 7 Climate Change [EN010133/EX1/C6.2.7_A]** where it is anticipated that the PV panels will be sourced from China or a country of similar

Reference	Theme	Summary of issue raised	Applicant's Response
			distance from the UK. Therefore, the Applicant has noted and accounted for the sourcing of panels within its assessment and that the manufacture and transport of products will likely be the largest sources of GHG emissions from the Scheme. The solar panels will be decommissioned, disassembled, and removed from the site for waste management, of which it is assumed 75-82.6% will be recycled as set out in para. 20.5.5 and 20.5.10 of **C6.2.20 ES Chapter 20 Waste [APP-055]**. Solar panels are predominantly made from recyclable materials such as the metal frames, mounting structures, and glass facing panes. There is also an emerging industry for recycling and reusing the internal fittings and electrical equipment within solar panels (para. 20.7.29). A cumulative effects assessment has been prepared for the Application within the **Environmental Statement [APP-036 to APP-058].** Cumulative effects assessments for each topic are set out in each of the ES Chapters and include the assessment of the impacts of the Scheme cumulatively with the NSIPs identified by WLDC (Gate Burton Energy Park, West Burton Solar Project and Tillbridge Solar Project) (see paragraph 2.5.9 of **C6.2.2 ES Chapter 2 EIA Process and Methodology [APP-037].** This assessment is in accordance with Schedule 4 of the 2017 EIA Regulations and PINS Advice Note 17. The mitigation measures set out across the ES therefore account for anticipated cumulative effects.

Reference	Theme	Summary of issue raised	Applicant's Response
CEI-02	Transport	1. Whilst the Applicant has stated that construction workers will avoid rush hour, has the pressure on those undertaking school runs and home care workers been considered already?	Paragraph 4.10 to 4.12 of the **C6.3.14.2_A ES Appendix 14.2 Outline Construction Traffic Management Plan EN010133/EX1/C6.3.14.2_A]** sets out the timings of construction worker movement. Paragraph 4.11 states that *"Construction worker shifts will be schedule[d] so that workers are not traveling during the network peak hours of 08:00-09:00 and 17:00-18:00".* Furthermore, paragraph 4.12 of the CTMP states that "*there should be limited or no construction vehicle movement between 08:00-09:00 and 17:00-18:00",* meaning that avoiding unnecessary vehicle movements during peak hours for schools and other workplaces will be taken into account during the construction of the Scheme. **C3.1_B Draft Development Consent Order Revision B [EN010133/EX1/C3.1_B]**, provides (in Requirement 15 of Schedule 2) that "*No part of the authorised development may commence until a construction traffic management plan for that part must be submitted to and approved by the relevant planning authority or, where the part falls within the administrative areas of multiple relevant planning authorities, each of the relevant planning authorities*". It further provides that "*The construction traffic management plan must be substantially in accordance with the outline construction traffic management plan.*" This means that the provisions for worker travel movements will need to be approved by the relevant planning authorities prior to construction of the Scheme commencing.

Reference	Theme	Summary of issue raised	Applicant's Response
CEI-03	Transport	She explained that there had been confusion surrounding the inclusion of Green Lane in works plans and negative sentiment relating to its use.	As detailed in Table 4.2 of **C6.3.14.1 ES Appendix 14.1 Transport Assessment [APP-134]**, the Green Lane will only be used for operational vehicle access and not during construction of the Scheme. Across the whole of Cottam 1, access for operational and maintenance purposes is only required a handful of times per month to check on equipment (see paragraph 5.22 of **[APP-134]**). This will be undertaken by a LGV (car or van) and not by HGVs. It is unlikely that every field within Cottam 1 will be checked on every visit, so use of the green lane by vehicles associated with the scheme will be very limited.
CEI-04	Transport	2. Does the Applicant intend to lay a permanent surface on Green Lane and why is it necessary to create an operational access on Green Lane rather than travel on other routes / construction routes?	The Applicant will not lay a permanent surface on the Green Lane. The Green Lane is currently public highway and open to use by all vehicles (not just those associated with the Scheme).
CEI-05	Book of Reference	3. Residents in the area believed Green Lane to be common land, but Book of Reference pages 303, 304 and 306 purport to list owners of various plot numbers. Please can the Applicant provide ownership numbers of the plot numbers?	The land referencing methodology includes requests to local Councils for their geo-spatial data for all highways they maintain. Dalcour Maclaren, the Applicant's land referencers, received such data from Lincolnshire County Council. Having geo-referenced this data, it shows Lincolnshire County Council as the Highways Authority for the land in question. However, it is necessary for the Book of Reference to list all persons with an interest in the land including any subsoil interests in a public highway. As such, Dalcour Maclaren have added the adjacent freehold interests for their ad medium filum interest. This is a legal presumption that the adjacent landowners are the

Reference	Theme	Summary of issue raised	Applicant's Response
			unregistered freeholder for the subsoil of the highway land to the midpoint.
CEl-06	Cultural Heritage	4. Are there no more appropriate locations for solar panels away from skeleton and pottery findings and the Abbey (ES chapter 13, section 13.17 and Table 13.9)?	During the field evaluation it was identified that ploughing was causing a high level of destruction to archaeological deposits (including an area where skeletal remains were identified). Consequently, the Applicant believes the Scheme will provide an opportunity to protect or record archaeological remains that are currently at risk of destruction from agricultural activity (Paragraphs 13.7.15, 13.7.33 and 13.7.34 of C6.2.13 ES Chapter 13_Cultural Heritage [APP-048]) The Heritage Statement within C6.3.13.5 ES Appendix 13.5 **[APP-125 to APP-128]** provides a detailed assessment of the designated heritage assets and identified that there would be no change/Negligible change to the Site of a college and Benedictine abbey, St Mary's Church in Stow (1012976). Works within the highway boundary for abnormal loads is proposed which enables HGV's to mount pavement adjacent to the Site of a college and Benedictine abbey, St Mary's Church in Stow (1012976). As detailed in Paragraph 3.1.24 **[APP-125]** although this might result in a small number of temporary and ephemeral impacts to the setting of the Scheduled Monument, there would be an overall no change to the significance of the monument. Mitigation in the form of close monitoring of manoeuvres by a suitably qualified banksman is proposed to ensure no

Reference	Theme	Summary of issue raised	Applicant's Response
			physical damage to the Scheduled Monument as a result of abnormal loads oversailing (Paragraphs 13.7.12 and 13.8.5 of C6.2.13 ES Chapter 13_Cultural Heritage **[APP-048]**). A comprehensive mitigation strategy is provided in a WSI **[APP-131]**, which is secured by Requirement 12 of Schedule 2 to **C3.1_B Draft Development Consent Order Revision B [EN010133/EX1/C3.1_B]**.
CEI-07	Cultural Heritage Transport (AIL)	5. With regard to mounting banks, can the Applicant confirm what the "experienced banksman" in ES Chapter 13.8.5 will do if the route is too narrow?	Swept path analysis has been undertaken to confirm Abnormal Indivisible Loads (AIL) can travel along the route. The AILs will be escorted and banksmen will support the movements as appropriate, in accordance with **C6.3.14.2_A ES Appendix 14.2 Outline Construction Traffic Management Plan EN010133/EX1/C6.3.14.2_A]**, paragraphs 5.21 and 5.22,
CEI-08	Transport (AIL)	6. Can the Applicant confirm whether compensation would be offered if an HGV does not fit around the bends?	An Outline Construction Traffic Management Plan (CTMP) has been prepared to support the application within **C6.3.14.2_A ES Appendix 14.2 Outline Construction Traffic Management Plan EN010133/EX1/C6.3.14.2_A].** This will be secured through Requirement 15 in **C3.1_B Draft Development Consent Order Revision B [EN010133/EX1/C3.1_B]**. The outline CTMP provides a framework for the management of construction vehicle movements to and from the Scheme, to ensure that the effects of the

Reference	Theme	Summary of issue raised	Applicant's Response
			temporary construction phase on the local highway network are minimised and made acceptable. Measure xxi of **C6.3.14.2_A ES Appendix 14.2 Outline Construction Traffic Management Plan EN010133/EX1/C6.3.14.2_A]** is for a road condition survey. This will ensure that any identified highways defects resulting from construction activities associated with the Site will be corrected to the satisfaction of the local highway authority.
CEI-09	Principle of Development	Ms Ella felt that the permissive pathway does not resolve the damage.	The Applicant notes this comment.

3.5 Simon Skelton

Reference	Theme	Summary of issue raised	Applicant's Response
SSk-01	Energy Need Alternatives and Design Evolution	Mr Skelton raised concerns about the inefficiency of solar schemes compared with the significant visual impact and stated that panels should be roof-mounted.	Table 7.1 of **C7.11 Statement of Need [APP-350]** shows the electricity generated per hectare by different low-carbon technologies. At the UK's average solar load factor (11%), solar generation produces much more energy per hectare than biogas, and generates a similar amount of energy as onshore wind. Section 3.3 of document **C7.11 Statement of Need [APP-350]**, specifically paragraphs 3.3.2, 3.3.5 and 3.3.11, describes the Government's view that large capacities of low-carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar". This support for large scale solar as part of the 'answer' to net zero and energy security has been repeated in its recent policy documents published in March 2023. **C6.2.8 ES Chapter 8_Landscape and Visual Impact Assessment [APP-043]** (the 'LVIA') includes a full and detailed assessment that deals with both effects on the landscape itself and effects on the visual amenity of people, as well as interrelationships of these with other related topics in the ES. The LVIA process is iterative and as a result, the design of the Scheme changed to respond to the findings of the assessment to ensure that landscape mitigation is fully considered as part of the process. This

Reference	Theme	Summary of issue raised	Applicant's Response
			assessment is undertaken in accordance with **C6.3.8.1 ES Appendix 8.1 LVIA Methodology [APP-068]**. For example, within the Cottam 1 Site, the PRoW bridleway (Fill/86/1) leads from Short Lane (at the settlement of Ingham) to join with PRoW footpath (Ingh/17/1), then eventually joins with Willingham Road. As a result of the Scheme, the foreground of the view would change from a large, gently sloping arable field to an area of panels. This is set out in **C6.3.8.3 ES Appendix 8.3 Assessment of Potential Visual Effects includes 8.3.1-8.3.5 [APP-075]** on sheet C6.3.8.3.5.2.1 Public Rights of Way Receptor – Fill/86 (Fill/86/1) and on sheet C6.3.8.3.2.3.19. In this instance (Sheet C6.3.8.3.5.2.1, page 1), the Embedded Mitigation would include panels set a minimum of 15m from the adjacent PRoW. Existing hedges would also be allowed to grow out and will be managed to a height of 5m. Hedgerow trees will be encouraged to grow out to add further thickening and growth to the field boundaries with the addition of new hedgerow trees as appropriate, randomly spaced along the length of the existing hedges at close range. Furthermore (Sheet C6.3.8.3.2.3.19, page 3), in the middle distance, new and augmented hedgerows will provide a series of strong field boundaries both formally strengthening the existing and historical field pattern and also in creating a multi-layered landscape.

3.6 Katrina Morton

Reference	Theme	Summary of issue raised	Applicant's Response
KMo-01	Cumulative Development	Ms Morton suggested that all four local solar applications be considered as one.	The Applicant respectfully disagrees. There are four separate projects that are the subject of separate DCO applications. Cumulative effects assessments have been prepared for the Application within **the Environmental Statement [APP-036 to APP-058]**. Cumulative effects assessments for each topic are set out in each of the ES Chapters and include the assessment of the impacts of the Scheme cumulatively with the NSIPs identified in paragraph 2.5.9 of **C6.2.2 ES Chapter 2 EIA Process and Methodology [APP-037]**. This assessment is in accordance with Schedule 4 of the 2017 EIA Regulations and PINS Advice Note 17. The mitigation measures set out across the ES therefore account for anticipated cumulative effects.
KMo-02	Cumulative Development Landscape and Visual Impact Ecology and Biodiversity	She objected to the compacting of effects on the rural landscape, views and wildlife from the number of schemes and stated that she felt the interrelationship was not being properly considered. Ms Morton specifically asked that the Applicant not use the argument that the West Burton Power Station means the area is already industrialised, as was used in the Gate Burton examination, as this is compact and already dismantled.	The Applicant notes this comment. The approach taken and subsequent conclusions regarding assessing the impacts of the Scheme alongside the proposed Gate Burton, West Burton and Tillbridge Solar proposals would not result in significant adverse effects on landscape character and visual amenity over an extensive area. For some receptors, in localised areas, at the construction stage and assessment year 1, adverse effects have been identified. with the Scheme and the Tillbridge proposals. These findings are set out within the individual

Reference	Theme	Summary of issue raised	Applicant's Response
			receptor sheets C6.3.8.2.3.1 and C6.3.8.2.3.2 ES Appendix 8.2 **[APP-074].** The assessment of potential cumulative landscape effects is set out in detail within **C6.3.8.2 ES Appendix 8.2 Assessment** of Potential Landscape Effects (the 'LVIA') that includes individual receptor sheets 8.2.1-8.2.12 **[APP-074]** where effects of the Tillbridge proposals are considered to the north of the Cottam 1 North Site. This assessment notes that the boundaries of Cottam 1 North and the Tillbridge proposals are located directly adjacent to each other, just south of Kexby Road and to the west of the settlement of Fillingham. This location takes account of those travelling along the regularly used routes such as major roads or popular paths. The cumulative effects with the Gate Burton proposals are illustrated on **C6.4.8.15.2.6 ES Figure 8.15.2.6 Gate Burton Cumulative Developments Cottam 1, 2 and 3a and 3b Augmented ZTV [APP-300]**. The settlements of Willingham by Stow, Kexby and Upton provide screening and separation between Gate Burton and the Cottam 1 Site. In respect of the Cottam 2 Site, the distance between Gate Burton and this particular site is approximately 6km, while the separation distance between Gate Burton and Cottam 3a and 3b Sites is approximately 9km. Cumulative effects

Reference	Theme	Summary of issue raised	Applicant's Response
			are therefore not considered to occur due to the significant distance between the projects. The cumulative effects with the West Burton proposals are illustrated on **C6.4.8.15.2.9 ES Figure 8.15.2.9 West Burton Cumulative Developments Cottam 1, 2 and 3a and 3b Augmented ZTV [APP-303].** The settlements of Sturton by Stow, Bransby and Broxholme provide screening and separation between West Burton and the Cottam 1 Site. In respect of the Cottam 2 Site, the distance between West Burton and this particular site is approximately 10km, while the separation distance between West Burton and Cottam 3a and 3b Sites is approximately 14km. Cumulative effects are therefore not considered to occur due to the significant distance between the projects. The cumulative effects with the Tillbridge proposals are illustrated on **C6.4.8.15.2.8 ES Figure 8.15.2.8 Tillbridge Cumulative Developments Cottam 1, 2 and 3a and 3b Augmented ZTV [APP-301],** the Tillbridge proposals are located to the west and east of the settlement of Springthorpe and situated between the settlements of Heapham, Hemswell Cliff and Glentworth. In respect of local wildlife, several valuable benefits for a wide spectrum of species have been assessed as likely to arise as a result of the Scheme. This is anticipated through the creation of wide, uncultivated and sensitively managed

Reference	Theme	Summary of issue raised	Applicant's Response
			buffer strips (to comprise wildflower meadow or tussocky grassland, predominantly) at all field boundaries, the extensive planting of several kilometres of new hedgerows and trees, as well as the creation of new wetland features such as ponds and scrapes. These features have also been targeted to contribute towards Lincolnshire's Biodiversity Opportunities Areas which have identified locations of strategic opportunity in the improvement of green infrastructure and corridors for wildlife movement. Consequently, as can be seen from the summary of residual effects table (Table 9.3) in **C6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-044]**, the scheme is considered to provide significant benefits for wildlife movement over the current agricultural situation. As noted within the **Rule 6 letter [PD-006]** Annex E, the Applicant is to produce a "Report on the interrelationship with other National Infrastructure projects" for each Deadline. This report will enable the Examining Authority, as well as those interested parties, to better understand the interrelationships between NSIPs.
KMo-03	Landscape and Visual Impact	She flagged further concerns about damage to the landscape not being considered temporary and asked that aerial mock-ups be produced showing what the solar panels and BESS will look like in the space. Ms Morton requested a longer time between hearings for individuals to prepare.	**C6.2.8 ES Chapter 8 Landscape and Visual Impact Assessment [APP-043]** (the 'LVIA') looks to provide landscape mitigation that enhances the landscape character and visibility of the Scheme from public vantage points including vistas from the Lincoln Ridge over to Nottinghamshire and across the Trent Valley. The

Reference	Theme	Summary of issue raised	Applicant's Response
			assessment also considers vistas experienced from transport routes, public footpaths, permissive footpaths and green lane network. This mitigation is aimed to benefit the community as a whole as well as tourists, visiting walkers, local residents, ornithologists and cyclists. The landscape mitigation measures will provide new planting, which will include new native hedgerows and tree cover, and this will also include their management and maintenance. The Applicant and its LVIA consultants at Lanpro have worked closely with the heritage and ecology consultants throughout the application process to inform the LVIA and associated mitigation plans. The mitigation proposals allow for flexibility, but they can also be fixed, where appropriate and applicable. The vistas concerned comprise viewpoints VP01, VP24, VP25, VP27, VP29, VP30, VP43, VP51 and LCC-C-L. This is set out in more detail at **ES Appendix 8.3 Assessment of Potential Visual Effects [APP-075]**. For example, with viewpoints VP24, VP25, VP27, VP43, VP51 and LCC-C-L, these are scoped out of the assessment due to distance from the Scheme and the screening effects of intervening topography, settlement and vegetation. With viewpoints VP01, VP29 and VP30, there are no potential significant effects at the construction, operation (Year 1 and Year 15) and decommissioning phase, since these locations capture

Reference	Theme	Summary of issue raised	Applicant's Response
			views across an agricultural landscape where the Scheme occupies only a small portion of the view. Some of these vistas (VP01, VP26, VP29, VP30, LCC-C-E and LCC-C-L) provide elevated viewpoints from where the cumulative effects of the Scheme are represented by photomontage (AVR 1 and AVR3) The LVIA [para 8.5.44] also recognises the importance of the Trent Vale Landscape Conservation Management Plan in implementing a long-term vision for the effective delivery of wildlife conservation at a landscape scale. Mitigation, including offsets and planting, has been proposed to address and minimise adverse effects on the character of the landscape and promote wildlife conservation. This is in line with the agreed methodology and the hierarchy of approach advocated by the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition and matters agreed with LCC at the series of workshops set out in **C6.3.8.4 ES Appendix 8.4 Consultation [APP-076]**. The photomontage work has followed recognised best practice ' Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3) by the Landscape Institute and Institute of Environmental Management & Assessment. This guidance states at paragraph 8.12 that: "*It is important to show as realistically as possible how the development will appear both in relation to the surrounding*

Reference	Theme	Summary of issue raised	Applicant's Response
			landscape and from specific viewpoints from which it will be seen by particular groups of people". Then at paragraph 8.18 that "*Its main advantage is that it can illustrate the development within the 'real' landscape and from known viewpoints".* An aerial view from above would not accord with the GLVIA3 guidance as it would not be representative of a group of people from a known viewpoint. As set out within **C7.5 Planning Statement [APP-341]** para. 3.3.11, the operational life of the Scheme is anticipated to be approximately 40 years. Once the Scheme ceases to operate, there is a commitment that it must be decommissioned, in accordance with the procedure set out in Requirement 21of Schedule 2 to the draft DCO. Decommissioning is estimated to be no earlier than 2066 (see paras. 3.3.15 to 3.3.18 of **C7.5 Planning Statement [APP-341].** Decommissioning is expected to take between 12 and 24 months. A 24-month decommissioning period has been assumed for the purposes of a worst-case assessment in the ES, (See paragraph 4.3.6 of **C6.2.4 ES Chapter 4 Scheme Description [APP-039]**). The Applicant has amended Requirement 21 of Schedule 2 to the draft DCO to ensure that the latest date that decommissioning can take place is 60 years from the date of final commissioning.

3.7 Pauline Organ

Reference	Theme	Summary of issue raised	Applicant's Response
POr-01	Energy Need Soils and Agriculture Climate Change Waste Ecology and Biodiversity Human Health Transport	Ms Organ was principally concerned about: • Sustainable food production (noting the land was very productive and currently produced tonnes of grain); • Overall carbon footprint (including disposal of panels to landfill on decommissioning); • Management of wildlife; • Distance between the cable route and dwellings (10m) (particularly in near Normanby by Stow); • Feed for cattle and collection of manure; • Transport affecting lanes for tractors with no other access routes.	Agricultural land in the Sites is predominantly (95.9%) Grade 3b, as set out in Table 1 of **C6.3.19.1 Agricultural Land Quality Soil Resources [APP-145]**. In Agricultural Land Classification (ALC), Grade 3b is not defined as Best and Most Versatile (BMV) agricultural land. The Defra UK Food Security Report notes that the proportion of domestically produced food for the UK (for both all food and just the foods that we can commercially produce) has remained stable for several decades. It also notes that the most serious risks to UK food security include climate change and soil degradation. Land use change and loss of land to development are not noted as significant risks to UK food security. As noted in **C6.2.19 ES Chapter 19 Soils and Agriculture [APP-054]** paragraph 19.5.2, there are no food security policy constraints on the use of agricultural land for solar power development, and alternative energy crops require a considerably larger land area per unit of energy, potentially displacing a greater area of food cropping. The solar panels will be decommissioned, disassembled, and removed from the site for waste management, of which it is assumed 75-82.6% will be recycled as set out in paragraph 20.5.5 and 20.5.10 of **C6.2.20 ES Chapter 20 Waste [APP-055]**. Solar panels are predominantly made from recyclable materials such as the metal frames, mounting structures, and glass facing panes. There is also

Reference	Theme	Summary of issue raised	Applicant's Response
			an emerging industry for recycling and reusing the internal fittings and electrical equipment within solar panels (see paragraph 20.7.29). Currently, the lifecycle of the majority of BESS is 15-20 years. At the detailed design stage the Applicant will place a significant procurement decision weighting to the manufacturing footprint and recycling program offered by the BESS provider. It is noted within paragraph 19.9.17 of **C6.2.19 ES Chapter 19_Soils and Agriculture [EN010133/EX1/C6.2.19_A],** the management of grass below and between the solar panels can include the grazing of livestock, where appropriate, thereby providing food for locally reared animals and ensuring that the Sites can continue in agricultural production for the operational period of the Scheme. The Outline Landscape and Ecological Management Plan (**C7.3_A Outline Landscape and Ecological Management Plan [EN010133/EX1/C7.3_A]**) contains grassland habitat management prescriptions (for example Section 4.7) which will ensure that undesirable plant species such as docks, nettles, ragwort, rushes and thistles will be adequately managed through cutting to ensure they do not become dominant. Monitoring from a contracted ecologist (Section 4.10) is also programmed to ensure the management prescriptions can adequately adapt to the particular conditions across the operational Scheme.

Reference	Theme	Summary of issue raised	Applicant's Response
			Measures set out in **C7.3_A Outline Landscape and Ecological Management Plan [EN010133/EX1/C7.3_A]** are secured through Requirement 7 in Schedule 2 of **C3.1_B Draft Development Consent Order Revision B [EN010133/EX1/C3.1_B]**. Paragraph 5.5.24 of **C7.6 Design and Access Statement - Part 1 of 4 [APP-342]** notes that the "final cable route corridor is predominantly 50m in width" which allows for the micro-siting of the cable route. The Applicant intends to work with landowners to micro-site the cable within the cable route corridor comprising the Order Limits to minimise disruption as far as practicable. Paragraphs 21.2.4 of ES Chapter 21: Other Environmental Matters **[APP-056]** details that electric fields from underground cabling is effectively null due to the grounding effect of cable sheathing and material infilled over the cables in the trough they are laid in. An Outline Construction Traffic Management Plan (CTMP) has been prepared to support the application within **C6.3.14.2 ES Appendix 14.2 Construction Traffic Management Plan [APP-135].** This will be secured through Requirement 15 in **C3.1_B Draft Development Consent Order Revision B [EN010133/EX1/C3.1_B]**. The outline CTMP provides a framework for the management of construction vehicle movements to and from the Scheme, to ensure that the effects of the

Reference	Theme	Summary of issue raised	Applicant's Response
			temporary construction phase on the local highway network are minimised and made acceptable.
POr-02	Alternatives and Design Evolution	1. What drives the choice of route? (She stated that it did not appear to be the most direct)	Section 5.9 of **ES Chapter 5: Alternatives and Design Evolution [APP-040]** details the criteria, consideration and parameters which have guided the design of the Cable Route Corridor as it has been refined and reduced from that set out at earlier stages of the Scheme's design development. The main criteria which have guided the Cable Route Corridor include Planning, Policy and Legislation, Technical and Engineering Requirements, Environmental Constraints and Land Use and Ownership Constraints.
POr-03	Ecology and Biodiversity	2. What will happen if wildlife gets stuck inside fencing?	The majority of animal species will be able to freely move through the operational sites and the boundary fencing in the same way as they are currently able to in other locations where deer fencing is used. An impact on the movement of deer is likely (Bullet point 9 within paragraph 9.6.5 of **C6.2.9 ES Chapter 9: Ecology and Biodiversity [APP-044]**), although it is acknowledged from the ecological monitoring of numerous active solar schemes that deer are regularly noted within the fenced areas having exploited locations of undulating terrain and other opportunities for entry. Consequently, it is considered unlikely that wildlife will become 'stuck' inside the fenced areas since they will be able to leave the fenced areas in the same ways that they entered.

Reference	Theme	Summary of issue raised	Applicant's Response
POr-04	Soils and Agriculture Ecology and Biodiversity	3. How will the site be managed if you cannot graze it – how will this lead to an increase in biodiversity?	With regards to grazing, the Applicant points the Party to paragraph 19.7.17 of **C6.2.19 ES Chapter 19_Soils and Agriculture [EN010133/EX1/C6.2.19_A]** where it states that the management of grass below and between the solar panels can include the grazing of livestock where appropriate and as such, the Sites can continue in agricultural production during the operational period. The Scheme has been carefully designed to retain all field boundaries which will be generously buffered and will be subject to ecologically-led management prescriptions, as set out in Section 9.6 of **C6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-044]**. In terms of management, the grassland beneath panelled land will receive low-intensity management and be seeded to create a habitat of significantly increased species diversity compared with the existing baseline. The Scheme is anticipated to result in a substantial net gain for biodiversity (see **C6.3.9.12 ES Appendix 9.12 Biodiversity Net Gain Report [APP-089]**), predominantly through the creation of extensive low-input grassland resulting in a net gain of 96.09% in habitat units, but also several new ponds and wetland habitat parcels resulting in a net gain of 10.69% in river units, and the planting of several kilometres of species-rich hedgerow resulting in a net gain of 70.22% in hedgerow units. This will be secured through the management and ecological monitoring prescriptions contained within **C7.3_A**

Reference	Theme	Summary of issue raised	Applicant's Response
			Outline Landscape and Ecological Management Plan [EN010133/EX1/C7.3_A] as secured by Requirement 7 of **C3.1_B Draft Development Consent Order Revision B [EN010133/EX1/C3.1_B].**
POr-05	Principle of Development	4. Is this the best and most efficient use of what the area has?	Table 7.1 of **C7.11 Statement of Need [APP-350]** shows the electricity generated per hectare by different low-carbon technologies. At the UK's average solar load factor (11%), solar generation produces much more energy per hectare than biogas, and generates a similar amount of energy as onshore wind. Section 3.3 of document **C7.11 Statement of Need [APP-350]**, specifically paragraphs 3.3.2, 3.3.5 and 3.3.11, describes the Government's view that large capacities of low-carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar". This support for large scale solar as part of the 'answer' to net zero and energy security has been repeated in its recent policy documents published in March 2023.

3.8 Patricia Mitchell

Reference	Theme	Summary of issue raised	Applicant's Response
PMi-01	Hydrology, Flood Risk and Drainage Ecology and Biodiversity Human health Cumulative Development	Ms Mitchell raised concerns about: • Previous floods being worsened by the runoff from solar panels set in concrete (she stated that she took issue with the images produced) (mentioned previous flood events for the River Till that caused cars to be abandoned and damage to properties); • Hedgerows being destroyed and the effect on wildlife, pests and visibility of the scheme; • Mental health impacts should be considered. • The four schemes not being considered as one.	Paragraphs 10.8.1 to 10.8.5 of **C6.2.10 ES Chapter 10_Hydrology, Flood Risk and Drainage [APP-039]** and Section 5.0 of **C6.3.10.1 ES Appendix 10.1 Flood Risk Assessment and Drainage Strategy Report [APP-090]** describe how the panels themselves do not cause a significant increase in hardstanding area as agreed with the LLFA's and EA in their relevant responses. The panels are raised on frames which have a minimal footprint and the land beneath the panels is proposed to be improved with grassland planting. Whilst the ground will be initially shadowed from rain by the panel, once on the ground, the water will follow local topography and infiltrate as existing. The Applicant confirms that following further development of the Scheme, details of areas in which there is proposed to be hardstanding will be provided at the detailed design stage, post-consent, if required. Paragraph 4.2.4 of **C6.2.4 ES Chapter 4_Scheme Description [APP-039]** summarises the Application's work packages. Works No 2, 3, 4, 6, 7, 8 and 9 are to result in the creation of hardstanding elements. **C7.15 Concept Design Parameters and Principles [APP-352]** when read alongside **C2.4_A Works Plan Revision A [AS-007]** further details the potential extent of areas which are to be made impermeable. The Applicant confirms that they are willing to provide further details of hardstanding elements at detailed design stage, post-consent, if required.

Reference	Theme	Summary of issue raised	Applicant's Response
			As stated in **C6.3.10.1 ES Appendix 10.1 Flood Risk Assessment and Drainage Strategy Report [APP-090],** any runoff from hardstanding/small buildings on the Sites will be captured on site, to prevent increasing runoff from the Sites. Provision of a full surface water drainage scheme is secured by Requirement 11 in Schedule 2 of **C3.1_B Draft Development Consent Order Revision B [EN010133/EX1/C3.1_B].** In certain locations where existing accesses do not exist, some very minor hedgerow removal is necessary to accommodate the access road between fields, land parcels and solar panel areas. Hedgerows to be removed are set out in the Hedgerow Removal Plans in Appendix C of **C7.3_A Outline Landscape and Ecological Management Plan Revision A [EN010133/EX1PEX/C7.3_A8.2.3]**. This removal will involve only very short sections of hedgerow to accommodate internal access roads and will not involve loss of trees, in particular trees protected under any Tree Preservation Orders (TPOs). Where these minor areas of hedgerow removal are required to enable construction only and are not required as operational accesses, vegetation will be reinstated as secured by Requirement 13 of Schedule 2 of **C3.1_B Draft Development Consent Order Revision B [EN010133/EX1/C3.1_B]** once construction is complete (see

Reference	Theme	Summary of issue raised	Applicant's Response
			table 3.3 of **C7.1_A Outline Construction Environmental Management Plan [EN010133/EX1/C7.1_A]**). With regard for hedgerows, the BNG Report **[APP-089]** shows that a net gain of 70.22% for hedgerow units is anticipated to be achieved through the Scheme. The Applicant is cognisant of the significance of the countryside for physical and mental wellbeing and as such, likely impacts on the desirability and use of recreational facilities in the countryside, such as public rights of way, have been assessed in Section 18.7 of **C6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-053]**. The greatest level of effect to access, desirability and use of recreational facilities is moderate-minor adverse and is anticipated during construction (see para. 18.7.60 to 18.7.67) and decommissioning (see para. 18.7.143 to 18.7.153). These effects are not anticipated to be significant. This is re-iterated in Section 21.5 of **C6.2.21 ES Chapter 21 Other Environmental Matters [APP-056].** Finally, as noted within the **Rule 6 letter [PD-006]** Annex E, the Applicant is to produce a "Report on the interrelationship with other National Infrastructure projects" for each Deadline. This report will enable the Examining Authority, as well as those interested parties, to better understand the interrelationships between NSIPs.

Reference	Theme	Summary of issue raised	Applicant's Response
PMi-02	DCO drafting	1. Why will 35 miles of hedgerow be removed?	Article 38 of the DCO contains the power to remove any part of the hedgerows listed in Schedule 13, and as shown on the Important Hedgerow Plan [**APP-013**]. However, this power must be read in the context of the controls and limitations on hedgerow removal that are set out in the Outline Landscape and Ecological Management Plan [**APP-339**]. The power in the DCO to remove hedgerows is drafted in a deliberately broad manner at this stage to provide flexibility, because the exact locations where permanent and temporary hedgerow removal will be required will not be known until the Scheme's design has reached a more detailed stage. In certain locations where existing accesses do not exist, some very minor hedgerow removal is necessary to accommodate the access road between fields, land parcels and solar panel areas. The Applicant has prepared Hedgerow Removal Plans in Appendix C of **C7.3_A Outline Landscape and Ecological Management Plan Revision A [EN010133/EX1PEX/C7.3_A8.2.3]** which set out the indicative locations for where minor hedgerow removals will be required for the Scheme. This removal will involve only very short sections of hedgerow to accommodate internal access roads and will not involve loss of trees, in particular trees protected under any Tree Preservation Orders (TPOs). Where these minor areas of hedgerow removal are required, it is to enable access for the construction phase only. These areas are not required as operational accesses, so vegetation will be reinstated as secured by Requirement

Reference	Theme	Summary of issue raised	Applicant's Response
			13 of Schedule 2 of **C3.1_B Draft Development Consent Order Revision B [EN010133/EX1/C3.1_B]** once construction is complete (see table 3.3 of **C7.1_A Outline Construction Environmental Management Plan [EN010133/EX1/C7.1_A]**).
PMi-03	BESS Safety EMF	2. What do we know of the dangers of BESS and EMF effects and how can anyone be sure residents will not be affected long term?	No BESS safety incident has been recorded as having anything other than short term environmental impacts i.e. for the incident duration. The Applicant, through **C7.9 Outline Battery Storage Safety Management Plan [APP-348]**, as committed to adhering to national and international safety standards, best practice and guidance for site design and BESS system procurement. These measures are secured by Requirement 13 of Schedule 2 of **C3.1_B Draft Development Consent Order Revision B [EN010133/EX1/C3.1_B]**. The WHO have published information and guidance surrounding electromagnetic fields[1] which recognises that "short-term exposure to very high levels of electromagnetic fields can be harmful to health", but that "despite extensive research, to date there is no evidence to conclude that exposure to low level electromagnetic fields is harmful to human health."

[1] World Health Organisation (2016). Radiation: Electromagnetic fields. Available at: https://www.who.int/news-room/questions-and-answers/item/radiation-electromagnetic-fields [Accessed 31 May 2023].

Reference	Theme	Summary of issue raised	Applicant's Response
			The levels of EMF produced by the Scheme are very low level and are many thousands of times lower than the International Commission on Non-Ionizing Radiation Protection (ICNIRP) monitoring levels for human health impacts. This monitoring level is only exceeded along a very narrow, less than 0.5m, strip along the Shared Cable Route Corridor (see para. 21.2.7 and 21.2.8 of **C6.2.21 ES Chapter 21 Other Environmental Matters [APP-056]**). The Shared Cable Corridor does not run adjacent to properties for this reason. It should be noted that while the ICNIRP monitoring level may be exceeded in this location, and only under maximum (peak) loading, the level of EMF is not great enough to induce human health impacts.
PMi-04	DCO Drafting	3. Do the cable route protective provisions cover collaboration across all parts of the scheme under discussion now and in the future during the Examination process, or just the cable?	Protective provisions for the protection of various statutory undertakers and other affected third parties are included in Schedule 16 to **C3.1_B Draft Development Consent Order Revision B [EN010133/EX1/C3.1_B]** and are currently either agreed or subject to ongoing negotiation. These protective provisions are intended to protect the interests and apparatus of those parties that stand to be affected by the Scheme wherever there is an interface between the Scheme and the interests of the third party. They therefore extend to the full extent of the Scheme rather than solely the Cable Route Corridor.
PMi-05	Cumulative Development	4. At what point would the four developments be considered as one scheme?	There are four separate solar projects each with a separate DCO application. As noted within the **Rule 6 letter [PD-006]** Annex E, the Applicant is to produce a "Report on the interrelationship with other National Infrastructure

Reference	Theme	Summary of issue raised	Applicant's Response
			projects" for each Deadline. This report will enable the Examining Authority, as well as those interested parties, to better understand the interrelationships between NSIPs. The current draft of this report has been submitted at Deadline 1.
PMi-06	General	5. Which outside body would be responsible for monitoring new collaboration with this and other schemes commencing after the examination process?	The relevant planning authority will be responsible for overseeing the discharge of detailed requirements for the Scheme and monitoring compliance with conditions and will also have oversight of new developments coming forward in the area. If potential new schemes need to take account of the Scheme in their ES cumulative assessments, then the relevant planning authorities and PINS will be able to comment on how this is done via the scoping process. Paragraph 2.2.1 bullet point 5 of **C7.1_A Outline Construction Environmental Management Plan [EN010133/EX1/C7.1_A]** sets out that a Community Liaison Group will be set up in accordance with the relevant DCO requirement prior to construction and will continue through until final commissioning of the Scheme as a formal forum for local issues to be raised. A Community Liaison Officer will be appointed to lead discussions with local communities, and also act as the primary point of contact should there be any queries or complaints.
PMi-07	Landscape and Visual Impact	6. Why are the angles used in the photomontages not the same?	The photomontage work has followed recognised best practice (GLVIA3) where the angle of view in relation to the main activity of the receptor is consistent across both

Reference	Theme	Summary of issue raised	Applicant's Response
			summer and winter conditions. We welcome specific feedback however as to where this is believed to have taken place but the Applicant's view is this is not the case.
PMi-08	Energy Need Alternatives and Design Evolution	Ms Mitchell stated that she felt rooftops of commercial buildings and car parks would be a better place to install solar panels for the energy transition.	The consideration of alternatives has been undertaken within **C6.2.5 ES Chapter 5 Alternatives and Design Evolution [APP-040]** and its accompanying appendix **C6.3.5.1 ES Appendix 5.1 Site Selection Assessment [APP-067]**. Specifically, paragraphs 2.1.23 to 2.1.32 detail the consideration of brownfield land and roof tops and sets out why these were discounted as unsuitable. The methodology used for the site selection process is considered reasonable and proportionate and complies with the requirements of NPS EN-1 4.4.3. Paragraph 7.6.3 of **C7.11 Statement of Need [APP-350]** analyses the potential contribution of "brownfield" solar sites to the national need for solar generation. Brownfield sites, including rooftop and other community energy systems, are likely to grow in the UK and will make a contribution to decarbonisation of the UK energy system. However, **C7.11 Statement of Need [APP-350]** concludes in Section 7.6, that on their own, brownfield developments are unlikely to be able to meet the national need for solar. Paragraph 8.5.10 and Section 8.5 more generally of **C7.11 Statement of Need [APP-350]** describe and express agreement with Government's view that decentralised and community energy systems are unlikely to lead to the significant replacement of large-scale infrastructure. The Applicant therefore supports Government's view that large

Reference	Theme	Summary of issue raised	Applicant's Response
			scale solar must be deployed to meet the urgent national need for low-carbon electricity generation.

3.9 Jeffrey Summers

Reference	Theme	Summary of issue raised	Applicant's Response
JSu-01	Soils and Agriculture Human health Socio-Economics, Tourism and Recreation Energy Need Consultation	Mr Summers raised issues relating to: • Reduction of food production (mentioned current wheat and oat exports and £300m contribution to economy); • Effects on health and wellbeing; • Destruction of the rural economy and employment opportunities; • Impact on tourism; • Inefficiency of solar panels (mentioned only worked 9 hours on a sunny day, reduced to 1/3 capacity on cloudy day, nothing at night and therefore not working at all for 66% of the year); • Growing crops – pay taxes • Impact on communities; • Lack of community/MP support.	The Applicant does not consider that the Scheme would result in food security impacts either alone or cumulatively. The UK annual balance of domestically produced food is sensitive to non-planning factors including weather and markets. The relevant assessment for policy purposes (and therefore decision-making purposes under the Planning Act 2008) is one that is based on the grade of the agricultural land, rather than its current use and the intensity of that use. The Defra UK Food Security Report notes that the proportion of domestically produced food for the UK (for both all food and just the foods that we can commercially produce) has remained stable for several decades. It also notes that the most serious risks to UK food security include climate change and soil degradation. Land use change and loss of land to development are not noted as significant risks to UK food security. As noted in **C6.2.19 ES Chapter 19 Soils and Agriculture [APP-054]** paragraph 19.5.2, there are no food security policy constraints on the use of agricultural land for solar power development. The Applicant recognises the significance of the agricultural industry in the local economy and has assessed the economic impact of the Scheme in Section 18.7 of **C6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-053]** and the direct impacts on local agriculture in

Reference	Theme	Summary of issue raised	Applicant's Response
			Sections 19.9 and 19.10 of **C6.2.19 ES Chapter 19 Soils and Agriculture [APP-054].** The Scheme is anticipated to lead to a maximum loss of approximately 17 full-time equivalent agriculture jobs, as stated in paragraph 18.7.15 of document **C6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-053].** The Scheme is estimated to employ 10 full-time equivalent employees from the local area during operation; see Table 18.16. The net change in employment in the local area (defined as West Lindsey and Bassetlaw Districts) during the Scheme's operational life is a loss of approximately 2 full-time jobs, once consideration of direct, indirect and induced employment, and impacts on the tourism and recreation industry are considered (see para. 18.7.79). Overall, the economic benefit to the local area is estimated to be £2.2 million per year (see para. 18.7.97). The overall employment and economic benefit to the local area from the two-year construction period is anticipated to be 661 full-time equivalent jobs (see para. 18.7.23), generating £30.9 million per year (see para. 18.7.52). The land included in the Scheme covers 4 farm businesses, all of which are owner occupiers of the land within the Sites. This is detailed in full in para. 7.1.1-17 of **C6.3.19.1 ES Appendix 19.1 Agricultural Land Quality Soil Resources and Farming Circumstances [APP-145].** Table 7.1 of **C7.11 Statement of Need [APP-350]** shows the electricity generated per hectare by different low-carbon

Reference	Theme	Summary of issue raised	Applicant's Response
			technologies. At the UK's average solar load factor (11%), solar generation produces much more energy per hectare than biogas, and generates a similar amount of energy as onshore wind. Paragraph 7.6.3 of **C7.11 Statement of Need [APP-350]** analyses the potential contribution of "brownfield" solar sites to the national need for solar generation. Brownfield sites, including rooftop and other community energy systems, are likely to grow in the UK and will make a contribution to decarbonisation of the UK energy system. However, **C7.11 Statement of Need [APP-350]** concludes in Section 7.6, that on their own, brownfield developments are unlikely to be able to meet the national need for solar. The Applicant is cognisant of the significance of the countryside for physical and mental wellbeing and, as such, likely impacts on the desirability and use of recreational facilities in the countryside, such as public rights of way, have been assessed in Section 18.7 of **C6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-053].** The greatest level of effect to access, desirability and use of recreational facilities is moderate-minor adverse and is anticipated during construction (see para. 18.7.60-67) and decommissioning (see para. 18.7.143-153). These effects are not anticipated to be significant. This is re-iterated in Section 21.5 of **C6.2.21 ES Chapter 21 Other Environmental Matters [APP-056].**

Reference	Theme	Summary of issue raised	Applicant's Response
			C6.2.8 ES Chapter 8 Landscape and Visual Impact Assessment [APP-043] takes account of the effects associated with the panels and associated infrastructure such as fencing and cameras, and substation and battery storage. The assessment of on-site infrastructure is based on their anticipated locations, and maximum height and size parameters (para. 8.6.16) to ensure a robust (worst-case scenario) assessment has been undertaken. This assessment is undertaken in accordance with **C6.3.8.1 ES Appendix 8.1 LVIA Methodology [APP-068]**.
JSu-02	Alternatives and Design Evolution Soils and Agriculture Energy Need	He also raised the suggestion of installing solar panels on roofs and stated that UK agriculture is already playing its part in growing crops for feedstock for energy generation.	Paragraph 7.6.3 of **C7.11 Statement of Need [APP-350]** analyses the potential contribution of "brownfield" solar sites to the national need for solar generation. Brownfield sites, including rooftop and other community energy systems, are likely to grow in the UK and will make a contribution to decarbonisation of the UK energy system. However, **C7.11 Statement of Need [APP-350]** concludes in Section 7.6, that on their own, brownfield developments are unlikely to be able to meet the national need for solar. Table 7.1 of **C7.11 Statement of Need [APP-350]** shows the electricity generated per hectare by different low-carbon technologies. At the UK's average solar load factor (11%), solar generation produces much more energy per hectare than biogas, and generates a similar amount of energy as onshore wind.
JSu-03	Energy Need	1. Where is the proven need for this proposal?	Section 3.3 of document **C7.11 Statement of Need [APP-350]**, specifically paragraphs 3.3.2, 3.3.5 and 3.3.11,

Reference	Theme	Summary of issue raised	Applicant's Response
			describes the Government's view that large capacities of low-carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar". This support for large scale solar as part of the 'answer' to net zero and energy security has been repeated in its recent policy documents published in March 2023.
JSu-04	Energy Need Planning Policy	2. How can this be supported under UK planning guidance?	Chapter 3 of **C7.11 Statement of Need [APP-350]** describes the UK's current National Policy Statements, and certain revised Draft National Policy Statements which have not yet been adopted but which may be important and relevant to the Secretary of State's determination of the DCO application for the Scheme. Furthermore, Appendix 3: National Policy Accordance Tables to **C7.5_A Planning Statement Revision A [EN010133/Ex1/C7.5_A]** details at length how the Scheme complies with the relevant adopted and emerging draft National Policy Statements for Energy.

3.10 Michael Dover

Reference	Theme	Summary of issue raised	Applicant's Response
MDo-01	Cumulative Development	Mr Dover stressed the negative impacts when combined with the other schemes and their timings, particularly as the residents are not professionals or represented.	The cumulative impacts of the Scheme with the West Burton Solar Project, Gate Burton Energy and Tillbridge Solar have been prepared for the Application within **the Environmental Statement [APP-036 to APP-058]**. Cumulative effects assessments for each topic are set out in each of the ES Chapters and include the assessment of the impacts of the Scheme cumulatively with the NSIPs identified in paragraph 2.5.9 of **C6.2.2 ES Chapter 2 EIA Process and Methodology [APP-037]**. This assessment is in accordance with Schedule 4 of the 2017 EIA Regulations and PINS Advice Note 17. The mitigation measures set out across the ES therefore account for anticipated cumulative effects. Additionally, as noted within the **Rule 6 letter [PD-006]** Annex E, the Applicant is to produce a "Report on the interrelationship with other National Infrastructure projects" for each Deadline. This report will enable the Examining Authority, as well as those interested parties, to better understand the interrelationships between NSIPs. The Applicant acknowledges that an Application seeking a Development Consent Order is technical in nature. The Applicant points the Party, and members of the public more broadly, to **C6.5_A ES Non-Technical Summary Revision A [EN010133/EX1/C6.5_A]** which provides a non-technical summary of the Environmental Statement.

3.11 Peri Hepburn

Reference	Theme	Summary of issue raised	Applicant's Response
PHe-01	Principle of Development Human health Ecology and Biodiversity Soils and Agriculture	Ms Hepburn raised the following issues: • The large size of the scheme; • Mental health concerns; • Wildlife conservation; • Loss of crop land.	The Applicant is cognisant of the significance of the countryside for physical and mental wellbeing and, as such, likely impacts on the desirability and use of recreational facilities in the countryside, such as public rights of way, have been assessed in Section 18.7 of **C6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-053]**. The greatest level of effect to access, desirability and use of recreational facilities is moderate-minor adverse and is anticipated during construction (see para. 18.7.60-67) and decommissioning (see para. 18.7.143-153). These effects are not anticipated to be significant. This is re-iterated in Section 21.5 of **C6.2.21 ES Chapter 21 Other Environmental Matters [APP-056]**. Section 7.7 of **C7.11 Statement of Need [APP-350]** sets out how the design of the Scheme seeks to maximise utilisation of the 600MW grid connection capacity available at Cottam Power Station. Paragraph 2.1.10 of **C6.3.5.1 ES Appendix 5.1 Site Selection Assessment [APP-067]** explains that the Applicant looked for sites that could accommodate a solar project to support the 600MW grid capacity. A land area of approximately 75ha of solar panels (100ha including landscaping and ecology mitigation land) is preferred to provide a solar scheme of approximately 50MW. For a grid connection of 600MW, a site size of approximately 1,300 ha (excluding cable route) was sought. The Applicant generally

Reference	Theme	Summary of issue raised	Applicant's Response
			seeks to find a site which is around 10% larger than is needed for the grid connection offer. This larger site size allows flexibility for the accommodation of any additional mitigation measures and other constraints that may become known through the design development process. Section 9.6 of **C6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-044]** sets out the extensive findings of all ecological investigations undertaken within the Order Limits together with an appraisal of the relative importance of each species or species group, habitat or designated site. A comprehensive package of mitigation measures has been identified, in tandem with embedded mitigation (see Section 9.6) established through the ecologically sensitive design of the Scheme (such as the wide buffering of all field boundaries and the use of existing hedgerow gaps for accesses). These measures have been further detailed within **C7.19 Outline Ecological Protection and Mitigation Strategy [APP-356]** and **C7.3_A Outline Landscape and Ecological Management Plan [EN010133/EX1/C7.3_A]** as secured by Requirements 8 and 7 of Schedule 2 of **C3.1_B Draft Development Consent Order Revision B [EN010133/EX1/C3.1_B]** respectively. **C6.3.9.12 ES Appendix 9.12 Biodiversity Net Gain Report [APP-089]** sets out how a significant net gain for biodiversity has been calculated and will be secured via Requirement 9 of Schedule 2 of **C3.1_B Draft Development Consent**

Reference	Theme	Summary of issue raised	Applicant's Response
			Order Revision B [EN010133/EX1/C3.1_B] for the life of the Scheme alongside the implementation of the LEMP **C7.3_A Outline Landscape and Ecological Management Plan [EN010133/EX1/C7.3_A]**, as secured by Requirement 7 of **C3.1_B Draft Development Consent Order Revision B [EN010133/EX1/C3.1_B]**. The BNG Report **[APP-089]** shows that a net gain of 96.09% for habitat units, 70.22% for hedgerow units and 10.69% for river units is anticipated to be achieved through the Scheme. The LEMP allows for regular ecological monitoring and adaptation of the management prescriptions in response to changing conditions within the Order Limits so as to ensure the long-term achievement of its aims and persistence of net gain. In certain locations where existing accesses do not exist, some very minor hedgerow removal is necessary to accommodate the access road between fields, land parcels and solar panel areas. Hedgerows to be removed are set out in the Hedgerow Removal Plans in Appendix C of **C7.3_A Outline Landscape and Ecological Management Plan Revision A [EN010133/EX1PEX/C7.3_A8.2.3]**. This removal will involve only very short sections of hedgerow to accommodate internal access roads and will not involve loss of trees, in particular trees protected under any Tree Preservation Orders (TPOs). Where these minor areas of hedgerow removal are required to enable construction only and are not required

Reference	Theme	Summary of issue raised	Applicant's Response
			as operational accesses, vegetation will be reinstated as secured by Requirement 13 of Schedule 2 of **C3.1_B Draft Development Consent Order Revision B [EN010133/EX1/C3.1_B]** once construction is complete (see table 3.3 of **C7.1_A Outline Construction Environmental Management Plan [EN010133/EX1/C7.1_A]**). The Applicant does not consider that the Scheme would result in food security impacts either alone or cumulatively, as noted in **C6.2.19 ES Chapter 19 Soils and Agriculture [APP-054]** paragraph 19.5.2. The UK annual balance of domestically produced food is sensitive to non-planning factors including weather and markets. The relevant assessment for policy purposes (and therefore decision-making purposes under the Planning Act 2008) is one that is based on the grade of the agricultural land, rather than its current use and the intensity of that use. In terms of key threats to UK food security, the Defra UK Food Security Report highlights that the main threat is climate change.
PHe-02	Energy Need Alternatives and Design Evolution	1. How has the efficiency of the solar panels been calculated? (She suggested a pilot to test efficiency)	Table 7.1 of **C7.11 Statement of Need [APP-350]** shows the electricity generated per hectare by different low-carbon technologies. At the UK's average solar load factor (11%), solar generation produces much more energy per hectare than biogas, and generates a similar amount of energy as onshore wind. Section 8.8 of **C7.11 Statement of Need [APP-350]** describes the energy security benefits of solar generation when it is deployed alongside a portfolio of other

Reference	Theme	Summary of issue raised	Applicant's Response
			technologies. Section 11.5 and Table 11.1 in particular of **C7.11 Statement of Need [APP-350]** describe the role of the energy storage facility as associated development to the main solar development in relation to contributing to the smooth operation of an electricity system with a high share of renewable energy supply. Regarding efficiency, solar panels and electrical infrastructure have become larger and more efficient. Figure 10.2 of **C7.11 Statement of Need [APP-350]** shows that many solar cells are over 20% efficient and some are within reach of 30% efficiency. This means that more low-carbon electricity can be generated from the same area of land compared to what was previously possible. Solar is now a leading low-cost generation technology and Figure 10.3 of **C7.11 Statement of Need [APP-350]** shows that on a levelised cost of energy basis (the estimated cost per unit of energy across the productive lifetime of an electricity generating station), large scale solar is already cheaper than offshore wind, and the Government's projections are that it will remain cheaper in the future. In 2021, Great Britain sourced 42% of its electricity from renewables, of which approximately 9.4% was from solar. Section 3.3 of document **C7.11 Statement of Need [APP-350],** specifically paragraphs 3.3.2, 3.3.5 and 3.3.11, describes the Government's view that large capacities of low-carbon generation will be required to meet increased demand and replace output from retiring (fossil fuel) plants,

Reference	Theme	Summary of issue raised	Applicant's Response
			and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar". This support for large scale solar as part of the 'answer' to net zero and energy security has been repeated in its recent policy documents published in March 2023.

3.12 Craig Pace

Reference	Theme	Summary of issue raised	Applicant's Response
CPa-01	DCO process Consultation	Mr Pace explained that he was informed by Savills that if cables passed through his land, he would be an Interested Party and that there would be a survey, but never heard back.	Please refer to the response to CPA-02 below.
CPa-02	Consultation	1. Why was he not contacted about this survey?	The Applicant received a signed survey access agreement from Mr Pace on 16.03.2022. However, the surveys may not have taken place at the time of the signing of the survey access as an alternate route was under discussion at that time. Since OFH1, the Applicant has confirmed that it intends to undertake surveys on the land and has had confirmation from owners Rachel Munn and Mr Pace that the land can be surveyed and subsequently considered for a potential alternative cable route, to respond to the issues raised relating to access to properties and the distance of the cable from residential premises.
CPa-03	Alternatives and Design Evolution	2. Why is a more direct cable route not being taken? (The cable route now passes near to his barns and properties)	Table 5.12 of **C6.2.5 ES Chapter 5 Alternatives and Design Evolution [APP-040]** details how the cable route was designed and refined prior to submission of the application. The route currently proposed has been assessed against a range of criteria and minimises the number of landowners involved and also minimises impacts upon farmland, as the cable in this particular location would have run along the route of an existing track. However, in light of the representations put forward during the open floor hearing

Reference	Theme	Summary of issue raised	Applicant's Response
			the Applicant is considering whether the routing can be altered to respond to the issues raised relating to access to properties and the distance of the cable from residential premises.
CPa-04	Consultation Alternatives and Design Evolution	He stated that he had received no communication despite cables running near to his properties and expressed a preference for the bottom end of his land to be used instead, as this is more direct and takes the cabling away from homes.	The Applicant notes that Chapter 2 of **C5.1 Consultation Report [APP-021]**, details how two phases of community consultation were undertaken to share information and invite feedback at different stages of Scheme development. Chapter 7 of **C5.1 Consultation Report [APP-021]** describes the Applicant's approach to statutory consultation, including consulting with relevant authorities on a draft Statement of Community Consultation. Table 7.1 sets out the comments received from authorities on the Applicant's approach to consultation and how these were considered by the Applicant. Table 7.3 in Chapter 7 describes how the Applicant complied with commitments made in the Statement of Community Consultation when undertaking statutory consultation. Chapter 8 of **C5.1 Consultation Report [APP-021]** describes how the Applicant undertook a six-week statutory phase two consultation on the Scheme, during which the Applicant presented consultees with environmental information sufficient for consultees to understand the potential likely significant effects of the Scheme in a Preliminary Environmental Impact Report (PEIR). A non-technical summary was published to accompany the PEIR, with public information events and free-to-use communications

Reference	Theme	Summary of issue raised	Applicant's Response
			channels open to help aid accessibility and understanding of the Scheme, including the accessibility of drawings and illustrations of the Scheme. The Applicant notes that a Phase Two Community Consultation Leaflet was issued to over 9000 properties within the vicinity of the Scheme, which the respondent's address lies within. A Consultation Summary Report for this phase of statutory consultation was published on the dedicated Scheme website, shared with elected representatives and stakeholders and issued to over 9,000 properties within the vicinity of the Scheme, to help consultees understand how their feedback was being considered. A copy of the Phase Two Consultation Summary Report is provided as **C5.7 Appendix 5.7: Phase Two Community Consultation Materials [APP-028]**. Chapter 11 of **C5.1 Consultation Report [APP-021]** describes the significant volume of responses received to Section 47 consultation (local community) , including the issues raised and how these were considered by the Applicant. This chapter also details that the Applicant received 694 pieces of feedback. This included 195 hard copy feedback forms, 320 responses to the digital engagement platform, and 179 written responses received by email or Freepost This is further evidenced by **C5.10 Appendix 5.10: Consultation Report Appendix – Section 47 Applicant Response [APP-033]**. In specific regard to Mr. Pace:

Reference	Theme	Summary of issue raised	Applicant's Response
			To comply with the policy for consultation for a Development Consent Order, Mr Pace was contacted on the following occasions: • 28/06/2022 – Statutory Consultation Notice • 06/07/2022 – Land Interest Questionnaire (LL404754) • 07/07/2022 – Phone call between Joel Roche and Rachel Munn (wife of Craig Pace), to discuss survey access. • 12/07/2022 – Land Interest Questionnaire (LL175994) • 18/08/2022 – Land Interest Questionnaire Reminder Letter • 15/02/2023 – S56 Notice
CPa-05	Transport Socio-Economics, Tourism and Recreation Human Health EMF Planning History	Mr Pace also raised the following issues: • The development impacting his use of the bridleway and therefore affecting his livelihood; • Health implications of infrastructure close to homes, including electromagnetic hypersensitivity – particularly radiation from solar panels and effects on children; • The development of four new homes next to the cable route being within the magnetic field. • Mr. Pace proposed an alternative routing for the cable to the South of his property which would be at a greater distance from his property as a result.	As set out in the Paragraph 2.10 of the **C6.3.14.2_A ES Appendix 14.2 Outline Construction Traffic Management Plan EN010133/EX1/C6.3.14.2_A]** the cable route will be built out in sections, with each access only used for approximately 90 days. During these periods, any PRoW within the extent of the DCO area will be managed in accordance with the **C6.3.14.3_A ES Appendix 14.3 Public Rights of Way Management Plan [EN010133/EX1/C6.3.14.3_A].** All objects carrying an electrical current will induce electric and magnetic fields. The electromagnetic fields generated by the Scheme are not anticipated to pose any significant risk to human health, nor detrimental impact to nearby infrastructure, as demonstrated by EMF impacts being

Reference	Theme	Summary of issue raised	Applicant's Response
			scoped out of the Environmental Impact Assessment (see section 3.13 of **C6.3.2.2 ES Appendix 2.2 EIA Scoping Opinion [APP-064]**). Electromagnetic hypersensitivity (EHS) is not a recognised health disorder by the World Health Organization, which states there is no scientific basis to link EHS symptoms to EMF exposure. The WHO have published information and guidance surrounding electromagnetic fields[2] which recognises that "short-term exposure to very high levels of electromagnetic fields can be harmful to health", but that "despite extensive research, to date there is no evidence to conclude that exposure to low level electromagnetic fields is harmful to human health." EMF standards set by the International Commission on Non-Ionizing Radiation Protection (ICNIRP) with regard to human health monitoring are set at 100μT. The EMF generated by the panels is very low level static fields as a result of their generation at 400V DC. At 20m away from the panels, such as on roads or public rights of way near the panel areas, the magnetic field strength is approximately 0.01μT. For comparison, the average field strength inside UK homes is 0.05μT. The greatest source of EMF from the Scheme is from the main substation at Cottam 1, which has been located to ensure it is more than

[2] World Health Organisation (2016). Radiation: Electromagnetic fields. Available at: https://www.who.int/news-room/questions-and-answers/item/radiation-electromagnetic-fields [Accessed 31 May 2023].

Reference	Theme	Summary of issue raised	Applicant's Response
			300m from any location accessible to the public (Stone Pit Lane) (see paragraph 21.2.9). As this distance, the likely magnetic field is not anticipated to be greater than 0.01μT. The cable route adjacent to Mr. Pace's property is likely to be a 400kV directly buried cable circuit. Directly over the cable route, the maximum magnetic field is anticipated to be 96μT. This is below the ICNIRP reference level for human health monitoring. The magnetic field strength drops substantially as distance from the cable increases. At present, the cable route could be as little as 5m from the property in question. At this point, the maximum magnetic field strength could be up to 13μT. This again is below the ICNIRP reference level for human health monitoring, and is a maximum value. The Applicant confirms that they are working proactively with Mr. Pace to explore the feasibility of the alternative cable route which he proposed to the south of his property, and will continue to engage with Mr Pace to determine the best outcome for both parties. Please see the responses to CPa-02 and CPa-03 for further details.
CPa-06	DCO process	3. What compensation would be paid where the value of nearby properties is affected?	Property values are not a material consideration for decision making in DCOs. As such, this should not be considered by the Secretary of State in making a decision as to whether to grant development consent for the Scheme.

Reference	Theme	Summary of issue raised	Applicant's Response
			Nonetheless, there is no strong evidence to show solar farms negatively affect nearby property values.

3.13 Catherine Booth

Reference	Theme	Summary of issue raised	Applicant's Response
CBo-01	Transport DCO drafting	Ms Booth stated that her parents have been renting a property for almost 30 years for which plots 14.297 and 14.292 are the only points of access. She stated that the 30m to be kept free above the route for maintenance (as given by National Grid) would not be possible here, and neither would the 40-60m width down this route.	The Applicant notes the location of **Land Plan [APP-006]** references 14-297 and 14-292. The Applicant confirms that there is no requirement for a 30m easement to be kept free of development, this is a specification that is imposed by National Grid as the owner of the national transmission system and is not a requirement for private cables.
CBo-02	Alternatives and Design Evolution	1. Is this really the optimum cable route option?	Section 5.9 of **ES Chapter 5: Alternatives and Design Evolution [APP-040]** details the criteria, consideration and parameters which have guided the design of the Cable Route Corridor which has been refined and reduced from that set out at earlier stages of the project to determine the least impactful option. The main criteria which have guided the selection of the Cable Route Corridor include Planning Policy and Legislation, Technical and Engineering Requirements, Environmental Constraints and Land Use and Ownership Constraints. **ES Chapter 9 Ecology and Biodiversity [APP-044]** paragraph 9.6.9 explains that the Cable Route corridor has been sited to best avoid impacts on valuable ecological features as identified during the desk study and ecological fieldwork. This includes observing appropriate buffers from sensitive boundary features (e.g. ditches, hedgerows, arable field margins) wherever possible.

Reference	Theme	Summary of issue raised	Applicant's Response
			In addition, horizontal directional drilling beneath particularly sensitive features (e.g. rivers, important ditches, Local Wildlife Sites, woodland etc.) has been adopted. In other, less sensitive locations, the cable will cross these features through open cut trenching. The width of the trench will be 1.1m wide, while a haul road will measure 3-6.5m, making all temporary hedgerow gaps measure up to 7.1m wide. This is estimated to occur at approximately 60 hedgerow locations (approximately 50 of which with dry or wet ditches) along the cable route length. As these are temporary habitat losses, they will be reinstated as soon as possible through hedgerow and grassland replanting/translocation/re-seeding. The ecological avoidance, mitigation and compensation measures determined to be necessary for cable route installation are set out within the **Outline Ecological Protection and Mitigation Strategy [APP-356].**
CBo-03	Alternatives and Design Evolution	2. Can you guarantee that these cables will be more than 10 metres away from our properties and the four new properties being built?	The cable is likely to be a 400kV directly buried cable circuit. Directly over the cable route, the maximum magnetic field is anticipated to be 96μT. This is below the ICNIRP reference level for human health monitoring. The magnetic field strength drops substantially as distance from the cable increases. At present, the cable route could be as little as 5m from the nearest property. At this point, the maximum magnetic field strength could be up to 13μT. This again is

Reference	Theme	Summary of issue raised	Applicant's Response
			below the ICNIRP reference level for human health monitoring, and is a maximum value. The Applicant confirms that they are working proactively to explore the feasibility of an alternative cable route to the south of these properties.
CBo-04	Transport	Ms Booth raised concerns about the frequency of accidents on the bend near to the cable route being increased.	As set out in the Paragraph 2.10 of the **C6.3.14.2_A ES Appendix 14.2 Outline Construction Traffic Management Plan EN010133/EX1/C6.3.14.2_A]** the cable route will be built out in sections, with each access only used for approximately 90 days. During these periods, vehicle movements at the the accesses will be managed through signage and banksmen to ensure the safety of all road users.
CBo-05	Human health EMF	3. What maintenance and checks will be implemented in the long term to ensure there are no health implications or issues arising from the proximity of cables to the properties?	The WHO have published information and guidance surrounding electromagnetic fields[3] which recognises that "short-term exposure to very high levels of electromagnetic fields can be harmful to health", but that "despite extensive research, to date there is no evidence to conclude that exposure to low level electromagnetic fields is harmful to human health."

[3] World Health Organisation (2016). Radiation: Electromagnetic fields. Available at: https://www.who.int/news-room/questions-and-answers/item/radiation-electromagnetic-fields [Accessed 31 May 2023].

Reference	Theme	Summary of issue raised	Applicant's Response
			The levels of EMF produced by the Scheme are very low level and are many thousands of times lower than the International Commission on Non-Ionizing Radiation Protection (ICNIRP) monitoring levels for human health impacts. This monitoring level is only exceeded along a very narrow, less than 0.5m, strip along the Shared Cable Route Corridor (see para. 21.2.7 and 21.2.8 of **C6.2.21 ES Chapter 21 Other Environmental Matters [APP-056]**). The Shared Cable Corridor does not run adjacent to properties for this reason. It should be noted that while the ICNIRP monitoring level may be exceeded in this location, and only under maximum (peak) loading, the level of EMF is not great enough to induce human health impacts. As such, health monitoring from EMF is not considered necessary. This position is supported by PINS, as demonstrated by the fact that EMF impacts were scoped out of the Environmental Impact Assessment (see section 3.13 of **C6.3.2.2 ES Appendix 2.2 EIA Scoping Opinion [APP-064]**).
CBo-06	Principle of Development	4. Can you predict the impact of the construction phase and how will this be mitigated? Has there been a hazard risk assessment provided in relation to the construction phase?	An Outline Construction Traffic Management Plan (CTMP) has been prepared to support the application: **C6.3.14.2_A ES Appendix 14.2 Outline Construction Traffic Management Plan EN010133/EX1/C6.3.14.2_A].** This is secured through Requirement 15 in **C3.1_B Draft Development Consent Order Revision B [EN010133/EX1/C3.1_B]**. The outline CTMP provides a framework for the management of construction vehicle movements to and

Reference	Theme	Summary of issue raised	Applicant's Response
			from the Scheme, to ensure that the effects of the temporary construction phase on the local highway network are minimised and made acceptable.

3.14 Raymond Stansfield

Reference	Theme	Summary of issue raised	Applicant's Response
RSt-01	Examination process	Mr Stansfield raised concerns about the timetable not allowing residents to attend and respond, and asked that the schemes in the area be grouped together.	As noted within the **Rule 6 letter [PD-006]** Annex E, the Applicant is to produce a "Report on the interrelationship with other National Infrastructure projects" for each Deadline. This report will enable the Examining Authority, as well as those interested parties, to better understand the interrelationships between NSIPs. The current draft of this report has been submitted at Deadline 1.