Cottam Solar Project

The Applicant's Responses to Written Representations

and other submissions at Deadline 1

Part 1

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Cottam
SOLAR PROJECT

Contents

Issue Sheet

Report Prepared for: Cottam Solar Project Ltd.
Examination Deadline 2

The Applicant's Responses to Written Representations and Other Submissions at Deadline 2: Part 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 the Written Representations (the 'WRs') and any other documents submitted for Deadline 1 which were submitted to the Planning Inspectorate (PINS) by 17 October 2023, relating to Examination Deadline 1 for the Development Consent Order Application (the 'Application') for Cottam Solar Project (the 'Scheme').

1.1.2 Local Impact Reports from the host local authorities have been responded to separately in **C8.1.16 The Applicant's Response to Local Impact Reports [EN010133/EX2/C8.1.16]**.

1.1.3 A total of 124 WRs and other documents were submitted to the Examining Authority by Interested Parties in response to the Scheme. All WRs were published on 25 October 2023 to the Planning Inspectorate's website (PINs Reference: EN010133). A further 2 WRs were received late and accepted at the discretion of the Examining Authority.

1.2 Structure of the report

1.2.1 This Part 1 document provides responses from the Applicant to the matters raised in those WRs and other documents received from the host local authorities (Lincolnshire County Council, North Kesteven District Council, Nottinghamshire County Council and West Lindsey District Council), Parish Councils and Neighbourhood Planning Committees. These WRs and other documents have been responded to in full through **Section 2.1** of this document.

1.2.2 **Parts 2 and 3** list those WRs received from all other statutory consultees, international agencies, undertakers, elected representatives, community organisations,members of the public and those whose interests would be affected by the Order References to the Application and Examination documentation, as submitted to the Planning Inspectorate, are provided in accordance with the referencing system as set out in the Planning Inspectorate's 'Cottam Solar Farm Examination Library'.

Table 1.1: List of organisations whose Written Representations and Other Submissions are responded to in Section 2.1.

PINS Reference	Acronym	Written Representation received from
REP-081	GPC-XX	Glentworth Parish Council
REP-082	IPC-XX	Ingham Parish Council
REP-083	LCC-XX	Lincolnshire County Council
REP-084	LCC-XX	Lincolnshire County Council
REP-087	SSPC-XX	Sturton by Stow Parish Council
REP-088	SSPC-XX	Sturton by Stow Parish Council
REP-089	WLDC-XX	West Lindsey District Council
REP-090	WLDC-XX	West Lindsey District Council
REP-131	BVPM-XX	Brampton Village Parish Meeting
REP-153	FPM-XX	Fillingham Parish Meeting
REP-204	BxPM-XX	Broxholme Parish Meeting (Solar Group)

Table 1.2: List of organisations whose Written Representations and Other Submissions are responded to in Section 2.2.

PINS Reference	Acronym	Written Representation received from
REP-092	EDF-XX	EDF Energy (Thermal Generation) Limited
REP-093	EA-XX	The Environment Agency
REP-094	EA-XX	The Environment Agency
REP-095	HE-XX	Historic England
REP-096	NGET-XX	National Grid Electricity Transmission plc
REP-097	NGET-XX	National Grid Electricity Transmission plc
REP-098	NE-XX	Natural England
REP-099	NRIL-XX	Network Rail Infrastructure Limited
REP-100 REP-102	WMC-XX	Water Management Consortium / Trent Valley Internal Drainage Board
REP-101	UNI-XX	Uniper
REP-134	CRT-XX	Canal and Rivers Trust
REP-135	CRT-XX	Canal and Rivers Trust
REP-145	DH-XX	Dee Hardman
REP-151	ELMP-XX	Sir Edward Leigh MP
REP-156	ELMP-XX	Sir Edward Leigh MP
REP-170	KS-XX	Kate Skelton
REP-196	SS-XX	Simon Skelton
REP-197	SS-XX	Simon Skelton
REP-198	SS-XX	Simon Skelton
REP-203	AD-XX	Alison Dudley
REP-207	NE-XX	Natural England

2 The Applicant's Responses to Written Representations and Other Submissions

2.1 The Applicant's Responses to the Host Local Authorities, Parish Councils and Neighbourhood Planning Committees

Glentworth Parish Council [REP-081]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
GPC-01	Principle of Development	Scale, cumulative impacts.	Concern over the scale of this, and multiple other solar projects adjacent to it, on productive farmland and on Glentworth and other villages.	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 **[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

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				Connection at Cottam Power Station, and Paragraph 9.4.4 concludes that the Proposed Development will contribute to national system adequacy and decarbonisation targets. **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 **[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]**. 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

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				17. The mitigation measures set out across the ES therefore account for anticipated cumulative effects. Please also refer to response SPM-03 and NE12 in **C8.1.2 The Applicant's Responses to Relevant Representations [REP-049]** in respect of the use of agricultural land and the benefits of improved soil health from the Scheme.
GPC-02	Transport and Access	Construction traffic	Glentworth will be impacted by cable construction traffic which, combined with the expected significant increase in HGV traffic on Hanover Hill/ Kexby Road from the recently approved IGas oil well application will have negative impacts on the community.	The Applicant notes that the Council is referring to Planning Application Number 146100 (West Lindsey) and PL/0135/22 (Lincolnshire County Council). This was submitted by the applicant IGas Energy Plc and deemed valid by Lincolnshire County Council on 20 December 2022, shortly before the Application for the Scheme was submitted to the Planning Inspectorate on 12 January 2023. Due to these timescales, the Applicant could not reasonably have considered this proposal when considering the cumulative effects of the Scheme. As set out in ES Chapter 14 Transport and Access [APP-049] HGV traffic associated with the Scheme will be kept to defined construction traffic routes. As set out in paragraph 14.7.65, Grid Connection Accesses 20 and 21 will be accessed on the route

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				A631 → Middle Street → Kexby Road. This is the only construction traffic route that routes HGVs past Glentworth. The forecast level of traffic for each access is up to eight arrivals and eight departures per day, around half of which will be HGVs (tipper truck and cable drum). Each access used for the cable route will only be used for approximately 90 days. The impact on Glentworth from the Scheme is therefore anticipated to be four HGVs in each direction each day for a maximum period of approximately 180 days. The Applicant will also be implementing measures to control construction traffic as set out in the outline **Construction Traffic Management Plan [REP-016; revised at Deadline 2]**, which is secured by Requirement 15 of **C3.1 Draft Development Consent Order [REP-006; revised at Deadline 2]**. These measures will ensure the impacts from construction traffic are minimised as far as practicable. The Applicant therefore does not consider that the Scheme will result in a significant impact to

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				the community of Glentworth, either alone or in cumulation with other projects in the area.
GPC-03	Transport and Access	Noise and Vibration Air Quality Road Safety	17 inhabited dwellings line Kexby Road in Glentworth with many others directly adjacent to the north. The increase in HGV and other traffic flows past the homes will dramatically impact the residents' lives in terms of noise, vibration, pollution and road safety.	Please refer to the response to GPC-03 above in relation to the volume of HGV traffic that will use Kexby Road in Glentworth. The potential for impacts from noise and vibration have been assessed in Section 15.7 of **C6.2.15 ES Chapter 15 Noise and Vibration [APP-050]**. The assessment considers temporary construction noise and vibration for the construction of the solar panels and associated infrastructure, and construction traffic noise. Best Practical Measures (BPM) and the measures set out in the **outline Construction Environmental Management Plan [REP-037; revised at Deadline 2]** will be implemented, secured by Requirement 13 of Schedule 2 to **C3.1_C Draft Development Consent Order [EX2/C3.1_C]**. Construction traffic will be minimised at existing receptors using the measures in the outline Construction Traffic Management Plan (CTMP) **[EX2/C6.3.14.2].** The CTMP is secured in Requirement 15 of Schedule 2 to the draft DCO Revision C of **C3.1 Draft Development Consent Order [EX2/C3.1_C]**. The noise and vibration effects are not anticipated to be significant.

Ingham Parish Council [REP-082]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
IPC-01	Climate Change	Decarbonisation	We agree that climate change calls for urgent action to decarbonise our economy. Solar is a proven technology, that can be deployed competitively, now.	This is accepted and supported by the findings of the Applicant's environmental submission.
IPC-02	Climate Change Energy Need	Role of solar in decarbonation of energy	The role solar can play in decarbonisation is very limited. Batteries don't solve the problem. We are against the proposed large-scale solar developments, because of their limited contribution to decarbonisation and the adverse consequences arising from using farmland in this way.	A detailed assessment of Greenhouse Gas including embodied carbon has been completed **in C6.2.7_A ES Chapter 7 Climate Change Revision A [REP-015]**. This assessment shows that the emissions associated with the production of batteries and other equipment is outweighed by the positive effect of the energy savings of producing electricity by 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, and that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar". 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. 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. Furthermore, paragraph 7.6.8 of **C7.11 Statement of Need [APP-350]** states that: "Draft NPS EN-3 includes an anticipated range of 2 to 4 acres for each MW of output generally required for a solar farm along with its associated infrastructure." The Scheme as proposed delivers a large-scale solar generation asset which is consistent with this range, as is described through paragraphs 4.2.1 to 4.2.3 of **C6.2.4 ES Chapter 4_Scheme Description [APP-039]**. This demonstrates that the proposed location is a suitable site which will provide for an asset which is consistent with government's view of best practice ratios of land take and installed capacity. Figure 8.2 of **C7.11 Statement of Need [APP-350]** shows how solar is expected to work alongside other renewable and low-carbon

				assets to meet demand throughout the year. The inclusion of batteries as part of the Scheme will allow the Scheme to store energy when it is in abundance and release it to the grid when it is needed.
IPC-03	Principle of Development	Environmental Impacts	Covering the countryside with solar panels has adverse consequences for food and farming, employment, wildlife and habitats, visual and disturbance during construction.	The Applicant has previously responded to Ingham Parish Council on the matters of employment, and wildlife and habitats, at responses "IPC-01" and "IPC-03" respectively in **C8.1.2 The Applicant's Responses to Relevant Representation [REP-049]**. Please refer to responses KPC-02 and KPC-03 in **C8.1.2 The Applicant's Responses to Relevant Representations [REP-049]**, considering food security and visual impacts respectively. Impacts resulting from the Scheme have been assessed in the **Environmental Statement [APP-036** to **APP-058]**. Significant adverse effects have been summarised in Table 23.1 of **C6.2.23_A ES Chapter 23 Summary of Significant Effects [EN010133/EX2/C6.2.23_A]**. **C7.1_B Outline Construction Environmental Management Plan Revision B [EN010133/EX2/C7.1_B]** (CEMP) sets out measures to control and mitigate against significant adverse impacts from the construction activities of the Scheme. The

				provision of a detailed CEMP is secured by Requirement 13 of Schedule 2 to **C3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C]**.
IPC-04	Alternative Sites Energy Need	Alternative Sites for Solar - rooftops	Solar should be deployed on rooftops instead.	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 **[APP-067]** detail the consideration of brownfield land and rooftops and set out why these were discounted as not being suitable to support a large-scale solar project. The methodology used for the site selection process is considered reasonable and proportionate and complies with the requirements of paragraph 4.4.3 in the currently adopted NPS EN-1. 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 to meet the urgent national need for low-carbon electricity generation.
IPC-05	Principle of Development	Decision Making Process	Where a solar development is considered at scale, it should be decided upon locally, not nationally – and any development must consider sustainability in its widest sense.	The Applicant notes this comment, and directs Ingham Parish Council to the Applicant's previous response to this topic at response "GEN-12" in **C8.1.2 The Applicant's Responses to Relevant Representation [REP-049]**.

Lincolnshire County Council [REP-083]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
LCC-01	Principle of development	Balance of Scheme benefits versus harms	Whilst the project would produce clean renewable energy that would support the nations transition to a low carbon future and deliver significant biodiversity net gain benefits through the creation of mitigation and enhancements as well as other more limited positive impacts, these positive impacts are not outweighed by the negative, some significant, impacts.	The Applicant respectfully disagrees with this comment. Section 6 of **C7.5_B Planning Statement [EN010133/EX2/C7.5_B]** demonstrates that when considered against national planning policies, the Scheme accords with the relevant policies. With regard to specific policy tests, the substantial benefits of the Scheme are considered, on balance, to outweigh its limited number of significant residual adverse impacts. Therefore, it is considered that development consent for the Scheme should be granted. Furthermore, the Applicant has responded in detail to Lincolnshire County Council's concerns as raised in their Local Impact Report (see **C8.1.16 Applicant's Response to Local Impact Reports [EN010133/EX2/C8.1.16]**, and to specific matters in the ES through **C8.3.2 Statement of Common Ground with Lincolnshire County Council [REP-063]**.
LCC-02	Landscape and Visual	Landscape Character	A permanent and negative impact upon the landscape character and the appearance of the area as a consequence of changes to the current arable agricultural land use.	Please refer to the Applicant's response to LIR Ref LCC 7.15 in the **C8.1.16 Applicant's Response to Local Impact Reports [EN010133/EX2/C8.1.16].**

LCC-03	Soils and Agriculture	Food security	National food security is equally important as energy and the Council has grave concerns about the removal of large areas of agricultural land out of food production for solar farms. This loss is not only at a local level but significant when considered in-combination with the loss of land from other NSIP scale solar developments that are also being promoted and considered across Lincolnshire	The key policy tests for the decision maker in respect of the Scheme's impact upon agricultural land are found in NPS EN-1, paragraph 5.10.8, and Revised Draft NPS EN-3, para. 3.10.15. In summary, this requires that applicants should seek to minimise impacts on BMV land, being ALC Grades 1, 2 and 3a), ensure impacts should be considered against the measures set out under paragraphs 2.10.66 – 2.10.83 and 2.10.98 – 2.10.110. Paragraph 5.10.15 then states that the Secretary of State should give little weight to loss of ALC grades 3b, 4 and 5 agricultural land, while Revised Draft NPS EN-3, para. 3.10.136 requires the Secretary of State to ensure mitigation measures to minimise impacts on soils and soil resources are appropriately provided by the Applicant. This is addressed in **C7.5_B Planning Statement, Appendix 3 page 62 and 63 [EN010133/EX1/C7.5_B].** 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. Please see Table 19.2 and paragraphs 19.5.2 to 19.5.3 of ES Chapter 19 Soils and Agriculture (C6.2.19A [REP-010]).
LCC-04	Transport and Access	Public Rights of Way	Negative impacts on the users of Public Rights of Way in and around the proposed development as a consequence of changes to the visual appearance of the area and views from these routes and uncertainty around the disruption	The Scheme features measures to protect existing Public Rights of Way through C6.3.14.3_B ES Appendix 14.3 Public Rights of Way Management Plan [EN010133/EX1/C6.3.14.3_B], as secured through Requirement 18 of Schedule 2 of C3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C].
LCC-05	Cultural heritage	Trial trenching	Uncertainty as a result of the restricted amount of trial trenching that has been undertaken across the Order Limits. Archaeological remains of more than local/regional significance could be disturbed and damaged. Consequently it is not possible to adequately assess the impacts.	The Applicant considers that they have taken a reasonable, proportionate and consistent approach to the archaeological evaluation guided by national and local guidance that has enabled the collection of high-quality reliable data. This has provided an adequate understanding of the archaeological potential and developmental impacts as set out in **C6.2.13 ES Chapter 13 Cultural Heritage [APP-048]** and has been used to formulate an appropriate mitigation strategy as set out in **C6.3.13.7 ES Appendix 13.7 Archaeological Mitigation WSI [APP-131].**

				Please refer to the Applicant's response to LIR Ref LCC 12.15- LCC 12.16 in the **C8.1.16 Applicant's Response to Local Impact Reports [EN010133/EX2/C8.1.16].**
LCC-06	Principle of Development	Time limit	The Development Consent Order should be time limited to 40 years as is currently proposed to be unrestricted	Please refer to the Applicant's response to LIR Ref NCC 2.85 and NCC 2.86 in the **C8.1.16 Applicant's Response to Local Impact Reports [EN010133/EX2/C8.1.16].**

Lincolnshire County Council [REP-084]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
LCC-07	Cumulative Effects	Linked hearing session	Concerned to ensure that cumulative effects are considered holistically and thoroughly, and that as a matter of procedure, thought is given to how this might be best achieved in a way which encourages public participation. One potential practical solution would be to hold a linked session with other extant examinations	The Applicant notes this comment and is willing to participate in a linked session if deemed appropriate by the ExA.
LCC-08	Environmental Matters	Hearings	The ISH on environmental matters must be held in person and not virtually	The Applicant notes this comment.
LCC-09	ISH1Draft DCO	Agenda items 5 Part 1 to 6	Part 3 Streets comments on Articles 8,9,10 and 11. The Council have concerns with the current wording as to the mechanism that is in place so that normal street works and permit processes are secured so the Council has the expected level of control.	The Applicant refers the Party to its **C8.1.5 Written Summary of the Applicant's Oral Submissions & Responses at the Issue Specific Hearing 1 and Responses to Action Points [REP-051].** At agenda item 5g, the Applicant explained in detail the rationale regarding the drafting of articles 8, 9 and 10 and relating to the mechanisms for approving highways works included in the draft DCOs for the Mallard Pass Solar Farm and the Gate Burton Energy Park. In response to the Party's concerns regarding the drafting of Article 9 (Power to alter layout, etc., of streets), **C.3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C]** includes an amendment to article 9(4) to enable

				a street authority to provide consent in the form reasonably required by it. No further changes were considered necessary as a result of this action. Article 14 allows agreements to be entered into covering topics typically contained in a section 278 agreement, for instance, relating to payment and timings of works. The definition of "street authority" in the **C.3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C]** includes Lincolnshire County Council as the highways authority. In respect of the concerns regarding the drafting of Article 11, the Applicant refers the Party to the response to agenda items 5g and 5f in **C8.1.5 Written Summary of the Applicant's Oral Submissions & Responses at the Issue Specific Hearing 1 and Responses to Action Points [REP-051].**
LCC-10	ISH 1 Draft DCO	Agenda items 5 Part 1 to 6	Part 6 Articles 38 and 39 as drafted allows any tree or hedge to be removed in the Order limits the Council has concerns about the ability to control and balance this.	Please refer to the Applicant's response to LIR Ref LCC 7.9 in the **C8.1.16 Applicant's Response to Local Impact Reports [EN010133/EX2/C8.1.16].**

LCC-11	ISH 1 Draft DCO	Agenda item 6 Schedules 1,2,9 and 17	The dDCO should be amended to specifically include reference to a 60 year time limit and a requirement to decommission the apparatus within this timeframe.	In order to address concerns raised in relevant representations and written representations about the Scheme potentially being in situ in perpetuity, a new sub-paragraph (1) has been added to Requirement 21 in Schedule 2 to the **C.3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C]** to require decommissioning to take place within 60 years of the final commissioning date. A 60-year period has been chosen to provide flexibility for the Scheme to continue operating where the solar PV panels continue to generate electricity after the average lifespan of 40 years has passed. The operational management plans which contain details of the mitigation measures to be maintained during operation are secured by the requirements in Schedule 2 to the draft DCO and must be implemented until the Scheme is decommissioned (regardless of the length of the operational period).
LCC-12	ISH 1 Draft DCO	Agenda item 6 Schedules 1,2,9 and 17	LCC request inclusion as a named relevant planning authority given its expertise in areas relating to various requirements, specifically in relation to highways and rights of way, fire risk, waste, flooding and soils	Schedule 2 to **C.3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C]** has been updated to include a breakdown of which authority/ies will be responsible for discharging each Requirement, as agreed with Lincolnshire County Council and West Lindsey District Council.

LCC-13	ISH 1 Draft DCO	Agenda item 6 Schedules 1,2,9 and 17	In respect of Requirement 5 the Council request an extra clause for planting 5 (1) (g) landscaping works including planting layouts, specifications and programme.	The Applicant has considered the drafting of Requirement 5, and does not consider any amendments to be necessary to this requirement in response to this point. This is because the detailed specifications for planting and other landscape mitigation and enhancement measures are secured though Requirement 7 of Schedule 2 to **C.3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C]**, which requires the preparation and approval of a detailed Landscape and Ecological Management Plan, which must be substantially in accordance with **C7.3_B Outline Landscape and Ecological Management Plan [EN010133/EX2/C7.3_B]**.
LCC-14	ISH 1 Draft DCO	Agenda item 6 Schedules 1,2,9 and 17	LCC considers it should properly be the discharging authority for Requirements 6, 11, 12, 15, 18 and 19. It should be a specified consultee in relation to Requirement 20	Schedule 2 to **C.3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C]** has been updated to include Lincolnshire County Council as the discharging authority for Requirements 6, 11, 15, 18 and 19, and as a specified consultee for Requirement 20. No amendment has been made to Requirement 12. As is explained against agenda item 6f in **C8.1.5 Written Summary of the Applicant's Oral Submissions & Responses at the Issue Specific Hearing 1 and Responses to Action**

				Points [REP-051], the Applicant considered it appropriate for the Secretary of State to decide to approve the archaeological Written Scheme of Investigation rather than the relevant planning authority. The current drafting of Requirement 12 means that the Secretary of State would be confirming that the Applicant should comply with the Written Scheme of Investigation, and no further approval would be needed.
LCC-15	ISH 1 Draft DCO	Agenda item 6 Schedules 1,2,9 and 17	In respect of Requirement 9 the Council agrees with the West Lindsey District Council comments and seeks consistency with this figure	The anticipated biodiversity net gain to be delivered as part of the Scheme is set out in the **C6.3.9.12 ES Appendix 9.12 Biodiversity Net Gain Report) [APP-089]**. The biodiversity net gain (BNG) strategy submitted and approved under Requirement 9 will secure the specific levels of habitat, hedgerow and river unit gains based on the final detailed design of the Scheme. As is explained against agenda item 6e in **C8.1.5 Written Summary of the Applicant's Oral Submissions & Responses at the Issue Specific Hearing 1 and Responses to Action Points [REP-051]**, the Applicant is mindful that BNG is a rapidly evolving area, with a different approach being taken in the Longfield Solar Farm Order 2023 (in which a requirement states that the landscape and ecological management plan must include details of how the plan will secure a

				minimum of 87% biodiversity net gain during the operation of the authorised development, calculated using Defra's Biodiversity Metric 4.0). The Applicant is keeping the position under review as the position BNG continues to evolve for nationally significant infrastructure projects, having regard to the need to ensure that the DCO allows for sufficient flexibility to account for any future changes to practice for how BNG is calculated.
LCC-16	ISH 1 Draft DCO	Agenda item 6 Schedules 1,2,9 and 17	For Requirement 12 there is a tension between the Council and the applicant, the Council's archaeology team are not satisfied with the written scheme of investigation as currently drafted as there is disagreement as to what should be included in this document.	As explained in the response to "LCC-14" above, the Applicant considers that the drafting of Requirement 12 in **C.3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C]** is robust. Discussions are ongoing between the Applicant and Lincolnshire County Council regarding the ongoing points of disagreement between the parties. For further detail, please see the draft Statement of Common Ground between the Applicant and Lincolnshire County Council submitted at Deadline 2 **[EN010133/EX2/C8.3.2_A]**.
LCC-17	ISH 1 Draft DCO	Agenda item 6 Schedules 1,2,9 and 17	Amendments requested to Requirement 21	In response to the requests for additional decommissioning management plans, in respect of managing traffic during decommissioning, **C7.2 Outline Decommissioning Statement**

				[APP-338] explains in paragraph 1.2.1 that a Decommissioning Environmental Management Plan (DEMP) (or multiple DEMPs) and a Decommissioning Traffic Management Plan (DTMP) will be produced and approved for the Scheme following the appointment of a contractor, prior to the commencement of the decommissioning phase of the Scheme. The outline decommissioning statement also states, in Table 3.1, that "*Suitable measures for the sustainable use of resources and waste management will be implemented during decommissioning*". An outline decommissioning statement forms part of the DCO application documents **[APP-338]** and decommissioning is secured by Requirement 21 of **C.3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C]**. The final decommissioning plan must be substantially in accordance with the outline decommissioning statement and, as such, the Applicant does not consider it necessary to include the names of any ancillary decommissioning plans that will form part of the overall decommissioning statement. Requirement 21 (decommissioning and restoration) has been amended in the draft DCO

				submitted at Deadline 1 to require the decommissioning plan to be provided to the relevant planning authority within 12 months of the intended date of decommissioning unless otherwise agreed with the relevant planning authority. In respect of the Party's comments relating to maintenance of damaged or defunct panels, the **Outline Operational Environmental Management Plan [APP-353]** contains details of the measures which will be implemented during operation and are secured by the Requirement 14 in Schedule 2 to **C.3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C]** . In respect of the Party's comments regarding the need for a decommissioning bond, the Applicant does not consider this to be necessary. The requirement to decommission, in accordance with an approved decommissioning plan, is secured in requirement 21 of **C.3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C]** A breach of a requirement of a DCO is a criminal offence pursuant to section 161 of the Planning Act 2008. Therefore, if the Applicant were to decommission the Scheme without preparing,

				submitting and having the decommissioning plan approved in accordance with Requirement 21, this would amount to an offence, which is considered to be a sufficient deterrent to ensure compliance. In addition, the Applicant notes that the Funding Statement **[APP-019]** illustrates that the Applicant has sufficient funds in place to deliver the Scheme.
LCC-18	ISH 1 Draft DCO	Agenda item 6 Schedules 1,2,9 and 17	Sch. 17, amendment from 6 weeks to 10 weeks requested. Should include standard drafting provisions in relation to fees.	Schedule 17 to **C.3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C]** has been updated so that the drafting of the Schedule aligns with the latest drafting of the Gate Burton draft DCO, including in relation to fees and timescales for approvals and consultation. It is the Applicant's intention to keep the draft of the Schedule under review to take account of any further amendments that are made to the Gate Burton DCO.
LCC-19	ISH 1 Draft DCO	Item 11 – any other matters	A separate Section 106 agreement is likely to be necessary to provide a mechanism for the Applicant to pay a monitoring fee to LCC in relation to the battery safety management plan given the intention to require ongoing compliance for the lifetime of the development under draft Requirement 6(4)	The Applicant notes this comment. The Applicant had not been approached directly about financial contributions by Lincolnshire Fire & Rescue at this stage. That notwithstanding, the Applicant is currently discussing with LCC the most effective means by which some form of monitoring fee can be secured through the DCO.

Sturton by Stow Parish Council [REP-087]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
SSPC-01	Scheme description	Scale	This particular solar farm is on an unprecedented scale	The Applicant notes this comment. Please refer to response SSPC-01 in **C8.1.2 The Applicant's Responses to Relevant Representations [REP-049]**. Chapter 4 of **C7.11 Statement of Need [APP-350]** sets out the UK's legal requirement to decarbonise and explains how that requirement has created an increased need and urgency to meet the UK's obligations under the Paris Agreement (2015) as detailed within para. 4.2.7. The Chapter summarises the latest expert views on the urgency for and depth of low-carbon infrastructure needed to deliver the UK's Net Zero legal obligations, and demonstrates that there is an urgent need for the development of large-scale solar schemes.
SSPC-02	Scheme description	Illustrative plans	How can informed decisions be made on illustrative plans?	Section 4.3 of **C6.2.4_A ES Chapter 4 Scheme Description Revision A [REP-012]** sets out the Rochdale Envelope for the Scheme, which is an agreed method for defining the maximum (and where relevant, the minimum) parameters for the Scheme where flexibility needs to be retained. By ensuring that the worst-case scenario is assessed within the Environmental Statement, the decision maker can be sure that the detailed design of the Scheme will be acceptable in environmental

				terms. The impacts identified within the Environmental Statement are managed by the requirement for embedded mitigation (factors that apply to how the Scheme is designed in detail) which are secured within the **Concept Design Parameters and Principles [REP-039]**. A series of management plans provide further controls to minimise the impacts of the Scheme, including the **Construction Environmental Management Plan [REP-037]** and the **Operational Environmental Management Plan [APP-353].** The assessment informs the extent of powers the Applicant is applying for in **C3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C]**. The Requirements set out in Schedule 2 to the dDCO require that the final management plans must be approved by the relevant planning authority (Lincolnshire County Council, West Lindsey District Council, and Bassetlaw District Council) before the relevant work or activity may take place.
SSPC-03	Scheme description	Developer	Will this project be sold on before it gets to the developmental stage?	The Applicant directs Sturton by Stow Parish Council to the Applicant's response to this topic at response "CGi-02" of **C8.1.4 Written Summary of the Applicants Oral Submissions and Responses at Open Floor Hearing 1 [REP-050]**.

SSPC-04	Scheme description	Solar Panel replacement rates	How many solar panels are actually forecast to be used for the Cottam solar project? What is the rate of failure of the panels and the expected replacement timings? This will impact on traffic obviously throughout the duration of the project itself.	The number of panels forecast to be used for the Scheme has been generated based on **C6.4.4.1-7 ES Figures 4.1-4.7 Illustrative Site Layout Plans [APP-152** to **APP-158]**. For the purpose of assessment in **C6.2.7_A ES Chapter 7 Climate Change Revision A [REP-014]** and **C6.2.20 ES Chapter 20 Waste [APP-055]** this is approximately 1.3 million individual panels (Table 20.7 **[APP-055]**). For the purpose of assessment in **C6.2.7_A ES Chapter 7 Climate Change Revision A [REP-014]** and **C6.2.20 ES Chapter 20 Waste [APP-055]**, a replacement rate of 0.4%, or ~5,300 panels per annum (Table 20.6 **[APP-055]**). Paragraph 14.7.70 of **C6.2.14 ES Chapter 14 Transport and Access [APP-049]** 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. Suitable mitigation for any operational impacts is secured in **C7.16 Outline Operational Environmental Management Plan [APP-353**by way of Requirement 14 of Schedule 2 to **C3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C]**.

SSPC-05	General comments Climate Change	Panel manufacturing and embodied carbon	Where will these panels be manufactured? Has the carbon that will be produced in the mining of the bare earth minerals and the manufacture and transport actually being accounted for against the generation of the electricity?	The Applicant directs Sturton by Stow Parish Council to the Applicant's response to this topic at responses "CGi-05" and "CGi-06" of **C8.1.4 Written Summary of the Applicants Oral Submissions and Responses at Open Floor Hearing 1 [REP-050]**. Please also refer to the response to 1.2.26 in **C8.1.15 Applicant's Response to ExA's First Written Questions**, submitted at Deadline 2.
SSPC-06	Other Environmental matters	Mental health and wellbeing	The mental health of residents should have more consideration	The Applicant believes sufficient consideration of the impacts of the Scheme on mental health and wellbeing have been assessed in Section 18.7 of **C6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-053]**. The Applicant furthermore has responded to residents' and local groups' concerns regarding mental health and wellbeing, particularly in respect of access, desirability and use of recreational facilities and routes in the countryside through **C8.1.2 The Applicant's Responses to Relevant Representations [REP-049]** (for example, response CJM-02) wherein comments and relevant responses fall under the remit of Socio-Economics, Tourism and Recreation, or Other Environmental Matters.
SSPC-07	Scheme description	Time and generation limits in the DCO	Why is there no upper limit of time or an upper limit of generation on the site?	The Applicant directs Sturton by Stow Parish Council to the Applicant's response to this topic at responses "CGi-08" and "CGi-12"of **C8.1.4 Written Summary of the Applicants Oral Submissions**

				and Responses at Open Floor Hearing 1 [REP-050].
SSPC-08	Scheme description		What is the actual capacity needed in order to generate 600MW? Because you will have change (DC to AC) from the solar panel generation to Cottam; My understanding is it's about a 6% differential.	The Applicant directs Sturton by Stow Parish Council to the Applicant's response to this topic at responses "CGi-09" of **C8.1.4 Written Summary of the Applicants Oral Submissions and Responses at Open Floor Hearing 1 [REP-050]**. Please also refer to the response to 1.1.13 in **C8.1.15 Applicant's Response to ExA's First Written Questions**, submitted at Deadline 2, in relation to alternating and direct current.
SSPC-09	Soils and agriculture	Gazing	Sheep and grazing are not a serious option for grass management.	The Applicant directs Sturton by Stow Parish Council to the Applicant's response to this topic at responses "CGi-10" of **C8.1.4 Written Summary of the Applicants Oral Submissions and Responses at Open Floor Hearing 1 [REP-050]**.
SSPC-10	Scheme description	Lighting	Lighting will have a major impact on the surrounding area. It will have a major ecological impact as well.	The Applicant directs Sturton by Stow Parish Council to the Applicant's response to this topic at responses "CGi-11" of **C8.1.4 Written Summary of the Applicants Oral Submissions and Responses at Open Floor Hearing 1 [REP-050]**.
SSPC-11	Draft DCO	Powers in the DCO	page 78, schedule ten, Article 22. It refers to blasting and piling. Is blasting necessary?	The Applicant directs Sturton by Stow Parish Council to the Applicant's response to this topic at responses "CGi-13" of **C8.1.4 Written Summary of the Applicants Oral Submissions and Responses at Open Floor Hearing 1 [REP-050]**.

SSPC-12	Transport and Access	Safety and delays	Concerns over use of B1241 as a main access route. Chapter 14. Appendix 14.2. The traffic passing along the B1241 in Sturton by Stow passes the primary school which is not included in the safety and delay assessments. Why is that?	The Applicant directs Sturton by Stow Parish Council to the Applicant's response to this topic at responses "CGi-14" of **C8.1.4 Written Summary of the Applicants Oral Submissions and Responses at Open Floor Hearing 1 [REP-050]**, and response TRA-17 in Part 3 of **C8.1.19 The Applicant's Responses to Written Representations**, submitted at Deadline 2.

Sturton by Stow Parish Council [REP-088]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
SSPC-13	Ecology and Biodiversity	Breeding Bird Survey	Breeding Bird Survey; Appendix 9.8 Breeding Bird Survey Report - APP C6.3.9.8 It is disappointing to note that Swans were only recorded as possibly breeding. This year Swans in the Cottam 1 area hatched 12 Cygnets. What mitigation will be expected to prevent swans mistaking PV panels for water and stranding themselves within a fenced off field?	Individual mute swans were recorded on four occasions along the River Till (at Cottam 1) and its subsidiary drainage ditches and embankments which run parallel to it during the breeding bird surveys conducted to inform the Scheme. Similarly, a total of ten mute swan records were made within the same habitats during the wintering bird surveys. Only three of these records were of individual birds within the Order Limits, confined to the field boundary habitats and arable field margins. It is considered that no significant effects would occur on mute swan owing to their restriction to the corridor of the River Till and the preservation (and enhancement of) wide undeveloped field boundaries close to the River Till, especially in Cottam 1. It is considered that mute swan will continue to be able to access the River Till corridor and associated drainage channels and field margins unimpeded post construction of the Scheme. As such, no impacts or need for mitigation was identified within **C6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-044].** Mute swans are a common and widespread breeding species within the UK and are Green Listed on the Conservation Concern Birds of

				Conservation Concern List prepared by the British Trust for Ornithology. The current guidance on the risk posed to birds from solar panels indicates that potential risk of collision is low, including the conclusions of a 2016 Natural England literature review (NEER012 – Evidence Review of the Impact of Solar Farms on Birds, Bats and General Ecology 2016). Furthermore, Natural England have responded in Section 42 consultation to confirm that impacts upon birds associated with the Humber Estuary SPA are unlikely (see pg.162-163 of **C5.11 Consultation Report Appendix – Section 42 Applicant Response [APP-034]**. The Applicant is not aware of any glint and glare issues affecting local wildlife and captive animals. Solar reflections generating from solar panels will be similar to the one generating from a body of water. Therefore, effects upon animals are likely to be similar to those assessed in Appendix B of **C6.3.16.1 ES Appendix 16.1 Solar Photovoltaic Glint and Glare Study [APP-0140]**. Due to the creation of wide development free buffer zones, the Site is likely to be suitable for foraging mute swan during the operational phase and the security fencing is not anticipated

				to restrict this species from passing through the landscape.
SSPC-14	Scheme description	Time limit	Environment Statement Chapter 4; Scheme Description APP C6.2.4 4.2.3 States the anticipated operational life of the scheme is 40 years. Why isn't this in the DCCO?	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 2 **[EX2/C3.1_C]** to require the Scheme to be decommissioned after 60 years.
SSPC-15	Scheme Description	Rochdale Envelope	Design flexibility is expressed via the 'Rochdale Envelope'. Why are finalised drawings not submitted?	Please see the Applicant's response to SSPC-02, above. Finalised design details for the Scheme these will be provided at the detailed design stage as secured through Requirement 5 of Schedule 2 to **C3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C]**.
SSPC-16	Scheme Description	DCO – generation capacity	The DCO should have restriction for generation capacity. There is precedence. See DCO for Burbo Bank Extension Offshore Wind Farm Order 2014.	An upper limit on the generation capacity of the Scheme is not considered to be desirable or necessary. The **C3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C]** includes reference to the maximum parameters of the Scheme and it is on this basis that the Environmental Impact Assessment has been undertaken, as set out in the **Environmental Statement [APP-036** to **APP-058]** (the 'Rochdale Envelope' approach). There is no reason to limit the electrical output capacity of the Scheme provided those

				parameters are adequately captured in the Order, as a limit could preclude the Applicant taking advantage of advances in technology that improve the efficiency of the Scheme. The Applicant is confident that those parameters are adequately secured in the DCO. This approach is consistent with the DCOs recently granted for renewable energy generation including the three granted solar DCOs (Longfield Solar Farm Order 2023, Little Crow Solar Park Order 2022 and Cleve Hill Solar Park Order 2020) and numerous offshore wind farm DCOs, including the Hornsea Four Offshore Wind Farm Order 2023.
SSPC-17	Scheme Description	BESS flood risk and drainage	BESS 4.5.33 There is mention of impermeable bunded water area. There is no mention of a leak detection system to detect leachate. This is a requirement. 4.5.34 The lagoon for run off contaminated water has no mention of leak detection system. This is a requirement. 4.5.37 There is no mention of noise bunding or mitigation.	The Applicant recognises that the use of an impermeable bunded water area has an associated risk of leaks from that area that may result in contamination. The outline Battery Storage Safety Management Plan (revised at Deadline 2) includes a requirement to include an environmental risk assessment to ensure that indirect risks, such as this, are understood and mitigated. The **outline Operational Environmental Management Plan [APP-353]** also includes measures to prevent pollution from leaks. These documents are secured by Requirements 6 and 14 respectively, in Schedule

				2 to **C3.1 Draft Development Consent Order [REP-006; revised at Deadline 2]**. The BESS has been located so as to minimise the proximity of receptors where noise impacts may be experienced. The location of the proposed BESS is more than 320m from any residential properties. A full assessment of the potential noise aspects of the Scheme is set out in **ES Chapter 15 Noise and Vibration [APP-050]**, with energy storage reviewed from paragraph 15.7.68.
SSPC-18	Scheme Description	BESS lighting	BESS 4.5.61 Lighting There could be use of PIR or timed lighting switches to avoid inadvertent light pollution for extended periods.	As per paragraph 4.5.61 of **C6.2.4_A ES Chapter 4 Scheme Description Revision A [EN010133/EX1/C6.2.4_A]**, "Lighting is not required within the solar arrays. Lighting will be provided within substations and within the Energy 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." Table 3.5 of the **outline Operational Environmental Management Plan [APP-353]** confirms that visible lighting would be installed at the BESS but used only outside of working hours in emergencies.

SSPC-19	Scheme Description	Decommissioning	4.8 Decommissioning - common practice as of now should be used as a baseline to calculate how decommissioning should occur.	The Applicant can confirm that the assumptions made in the assessment of waste handling during operation and decommissioning in Section 20.7 of **C6.2.20 ES Chapter 20 Waste [APP-055]** are reliant on current waste handling facilities capabilities and practices. Requirement 21 of **C3.1 Draft Development Consent Order [REP-006; revised at Deadline 2]** requires a decommissioning plan to be approved by the relevant planning authority in advance of decommissioning. This ensures that the Scheme will be decommissioned in compliance with all relevant duties, policies and standards applicable at that time. The decommissioning process is not prescribed in detail at this time, to ensure that the final decommissioning plan is legally compliant at the time of decommissioning.
SSPC-20	Scheme description	Decommissioning	Include clause within DCO for abatement of works abandoned or decayed.	The Applicant does not consider that this article needs to be included in the draft DCO [**EX2/C3.1_C**]. This article is not precedented in any of the made solar DCOs (Longfield Solar Farm Order 2023, Little Crow Solar Park Order 2022 and Cleve Hill Solar Park Order 2020). The **C7.16 Outline Operational Environmental Management Plan** [**APP-353**], as secured by Requirement 14 to the DCO [**EX2/C3.1_C**], sets

				out proposals for the maintenance of the Scheme during its operational period, which includes replacement and renewal of any Scheme components that fail, in order to optimise efficiency of the Scheme's infrastructure.
SSPC-21	Transport and Access	Construction Traffic Management Plan C6.3.14	Comments made about the Cottam 1 West construction route, including the location of bus stops and community facilities. Labelling changes to Figures requested.	The Applicant directs Sturton by Stow Parish Council to the Applicant's response to this topic at responses "CGi-14" of **C8.1.4 Written Summary of the Applicants Oral Submissions and Responses at Open Floor Hearing 1 [REP-050]**, and response TRA-17 in Part 3 of **C8.1.19 The Applicant's Responses to Written Representations**, submitted at Deadline 2. The labels to roads on Figure 5.3 are intended to enable the reader to identify the roads in question. Whilst the Applicant recognises that some roads, including Stow Road, undergo changes of name along their length, including this level of detail on the Figure would reduce clarity and understanding of what it is intended to show, namely the construction traffic routes to be taken by construction vehicles. The Applicant believes that the figure is clear, and notes the Council's detailed comments in respect of the construction routes confirm that these have been understood correctly.

SSPC-22	Flood Risk and Drainage	Appendix 10.1: Annex E 10.1.4 Cottam 1 South: APP C6.3.10.5	Sturton by Stow was chosen to pilot the 'Riparian Project' with Lincolnshire County Council. Flooding issues within Sturton by Stow highlighted.	The proposed solar schemes will not contribute to an exacerbation of flooding in the area. The embedded mitigation detailed in section 10.7 of **C6.2.10 ES Chapter 10_Hydrology, Flood Risk and Drainage [APP-039]** will ensure there is no loss of flood storage as a result of the development. Paragraph 4.5.66 confirms that there will be no off-site detriment in terms of surface water runoff rates and volumes and that the existing surface water run-off regime will ~~be~~ mimic~~ked~~ the existing baseline~~.~~ The proposed drainage strategy is detailed within Section 5.0 of **C6.3.10.1 ES Appendix 10.1 Flood Risk Assessment and Drainage Strategy Report [APP-090].** It is considered that the panelled areas will not alter the existing surface water run-off regime and will therefore not be formally drained. Areas of increased hardstanding such as smaller areas of hardstanding formed as footings for electrical infrastructure will utilise sustainable drainage system (SuDS) principles and attempt to mimic the existing surface water run-off regime as existing. The BESS area within the Scheme is considered within an area specific drainage strategy included within Section 3.0 of **C6.3.10.4 ES**

				Appendix 10.1 Annex D 10.1.3 Cottam 1 West [APP-093]. The drainage strategy and detailed drainage design will be developed during the detailed design process. As secured by Requirement 11 in Schedule 2 of the **C3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C]** "No part of the authorised development may commence until written details of the surface water drainage scheme and (if any) foul water drainage system for that part have been submitted to and approved by the relevant planning authority."
SSPC-23	Landscape and Visual	Cumulative Developments C6.4.8.15	Other solar schemes should be shown on this figure.	All sites and development included within the cumulative assessment have been discussed and agreed with the consenting authorities, including LCC during the LVIA Workshops. This is set out within **C6.3.8.4.1 of C6.3.8.4 ES Appendix 8.4 Consultation includes 8.4.1- 8.4.4 [APP-076],** which documents the engagement with The Planning Inspectorate, Bassetlaw District Council, Lincolnshire County Council, Natural England [see pages 2, 4, 5, 7, 11, 12 and 13] and within **C6.3.8.4.2 ES Appendix 8.4.2 Consultation [APP-076]**, which documents the engagement with Lincolnshire County Council, Bassetlaw District Council, Natural England [see pages 1, 2, 3, 5, 14, 15, 16, 17, 21, 26, 27, 28, 29, 30, 31, 33, 35, 36, 37, 39, and 41 and within **C6.3.8.4.4 3 ES**

				Appendix 8.4.3 Consultation [APP-076], which documents engagement at public engagement events in November 2021 and with The Planning Inspectorate, Bassetlaw District Council, Lincolnshire County Council, Natural England, [see pages 1, 2, 4, 5, 7, 11, 12, 13 and 14] and within **C6.3.8.4.4 ES Appendix 8.4.4 Consultation [APP-076]**, which shows liaison with Lincolnshire County Council and Nottinghamshire County Council [see pages 1 and 2].
SSPC-24	Noise and Vibration	Appendix 15.1 Noise Survey	Query re ST8 Marton Road, Sturton by Stow survey location as distant from Cottam 1 South regarding Sturton.	ST or Short-term monitoring locations were used to validate the nearest LT long-term monitoring measurements. LT measurements are generally considered to be more robust as they are collected over a longer time period and are selected to represent the worst-case in terms of background noise level.

West Lindsey District Council [REP-089]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
WLDC-01	General Comments	Purpose of Document	The Written Representation is to be read alongside the LIR as a document that goes beyond solely identifying impacts and serves as an assessment of the merits of the application against policy as required by the PA2008	Noted. No response required.
WLDC-02	General comments	Context	Section 2 sets out the general context for the Scheme in terms of landscape character, socio-economics, environment and a description of the site and surrounding area. It also sets out what the Council identify to be the key challenges for the area.	Noted. The Landscape and Visual Impact Assessment (LVIA) contained within **C6.2.8 ES Chapter 8 Landscape and Visual Impact Assessment []** takes into account the effects on the landscape character in detail, from the national scale, through regional, county district and local scales to the landscape character areas within the 5km Study Area. For further information, please refer to **C6.3.8.2 ES Appendix 8.2 Assessment of Potential Landscape Effects includes 8.2.1-8.2.12 [APP-074]**. These associated appendices provide a detailed assessment of landscape effects on each landscape receptor relating to Central Lincolnshire's natural environment. This includes the contrast between the upland and lowland areas, the big skies, the north-south grain and that outside the urban

				areas the land use is predominantly agricultural.
WLDC-03	Scheme Description	Scheme Description	Section 3 sets out a description of the Scheme based upon Chapter 3 of the Environmental Statement (ES) (Doc. Ref. APP/C6.2.3.) and chapter 2 of the supporting Planning Statement (Doc. Ref. APP/C7.5)	Noted. No response required.
WLDC-04	Planning Policy	Decision making framework	WLDC recognises the application as one made under the Planning Act 2008 (PA2008) for a Development Consent Order (DCO) for development that falls within the definition of energy generating stations set out in section 15 of the PA2008.	Noted. No response required.
WLDC-05	Planning Policy	Local Impact Report (LIR)	The key impacts of the LIR are summarised in this section.	Noted. See Applicants Response to Local Impact Reports [C8.1.16]
WLDC-06	Planning Policy	Other Relevant Matters	Paragraphs 4.8 - 4.34 set out the relevant national and local planning policies.	Noted. No response required.
WLDC-07	Planning Policy	Key Issues	Section 5 sets out the key impacts of the Scheme which are categorised into 5 key areas (note that there are actually six set out as below): 1)The approach to the consideration of the Cottam Solar Project	Noted. No response required.

			2) The approach to site selection and alternatives for the scheme. 3) The impact of the development on the community. 4) The impacts of the development from the main site. 5) The combined Grid connection corridor. 6) The cumulative impacts with other projects.	
WLDC-08	General	Approach to the consideration of the Cottam Solar Project	To consider the impacts of each section of the site (Cottam 1, 2, 3a and 3b), the site must be considered as a whole	Noted. No response required.
WLDC-09	Alternatives and Design Evolution	Approach to site selection and alternatives	A clear set of objectives or principles to guide the decision making process to ensure the final shortlisted site is consistent with the design, planning and environmental objectives for the project appears to be absent. For solar infrastructure projects of this scale it is expected that objectives that would reflect a well-designed project are identified and embedded at the start of the site selection process. Such objectives would include:	The Site Selection Assessment **[APP-067]** sets out the five stage assessment methodology that was undertaken at section 2. Where the bullet pointed objectives set out by the Council were taken into consideration within the Site Selection Assessment **[APP-067]** is set out below: • Minimising the distance between the grid connection and the solar panels to minimise environmental impacts; Considered at Stage 1 – Paragraph 2.1.12 states *"an initial search area was identified at a 5km*

			• Minimising the distance between the grid connection and the solar panels to minimise environmental impacts; • Topography being flat or with shallow south facing slopes'. • Sites to be of a size suitable for economic viability and being fields that are large and regular in shape; • Fields identified to be contiguous to provide a self-contained site that minimises impacts; • To be located near to existing main highways with ease of access for construction and decommissioning; • Brownfield land opportunities to be identified and considered; • Preference for a small number of willing landowners to form a contiguous site.	*radius from the POC, however this was later expanded with the clear preference of identifying land as close to the POC as possible, the search area was enlarged incrementally until suitable options were found"* • Topography being flat or with shallow south facing slopes' ; Considered at Stage 3 – Paragraph 2.1.34 states: *"All land with a 3% or less gradient which is considered to be very flat and optimal for solar generation has been considered potentially suitable to meet the Scheme's requirements of maximising energy generation and avoiding visual intrusion. This land has been taken forward to the Stage 4 assessment"* • Sites to be of a size suitable for economic viability and being fields that are large and regular in shape; Considered at Stage 3 – See paragraphs 2.1.18 - 2.1.22. Paragraph 2.1.21 explains that *"Areas of unconstrained land of at least 40ha were therefore taken forward to the Stage 4 assessment."*

				• Fields identified to be contiguous to provide a self-contained site that minimises impacts; This was not considered to be an essential objective of the site selection process because the Applicant considers that it is possible to create a well-designed Scheme that minimises environmental impacts through a linked network of sites as proposed. Section 6.4 of the Planning Statement shows that the Scheme has been subject to a detailed and sensitive iterative design process. This has taken account of the context and features of the land within the Order limits, nearby sensitive receptors and assets, information emerging from environmental surveys, feedback from stakeholders, and opportunities and constraints in order to develop a good design that balances the need to maximise the energy generation capacity of the Scheme, with the avoidance and mitigation of impacts, and provision

				of environmental and other enhancements, where practicable. • To be located near to existing main highways with ease of access for construction and decommissioning; Considered at Stages 4 and 5. See Annex B Assessment Indicator B6 which assesses whether the local road network, from the primary road network to the potential development area, is suitable for HGV access, having regard to listed evaluation criteria. • Brownfield land opportunities to be identified and considered; Considered at Stage 3 together with suitability of rooftop solar, see paragraphs 2.1.23 - 2.1.32. • Preference for a small number of willing landowners to form a contiguous site. Availability of willing landowners was considered at Stage 5 (see paragraph 2.1.40 - 2.1.43. This identified potentially willing landowners with large-scale land holdings and resulted in the identification of four potential

				development areas as well as the Scheme land. Some of the PDAs were more contiguous areas of land than the Scheme land but nevertheless, the assessment concluded that there are no obviously more suitable locations within the area of search than the proposed Sites for the Scheme.
WLDC-10	Alternatives and Design Evolution	Approach to site selection and alternatives	West Burton NSIP application states that the maximum viability distance from the point of connection at Cottam Power Station for that project is 15km. As that applicant for West Burton is the same as this Cottam project (Island Green Power) WLDC this raises concerns regarding the viability distance, consistency between projects and the manner in which this influences good design that minimises impacts on the environment and communities.	Paragraph 2.1.12 of the Site Selection Assessment states: *"an initial search area was identified at a 5km radius from the POC, however this was later expanded with the clear preference of identifying land as close to the POC as possible, the search area was enlarged incrementally until suitable options were found within a 20km radius which is considered by the Applicant to be a viable cable connection distance for a solar project of this scale."* The same site selection approach was taken for the West Burton Solar Project but in that case, a suitable site was found within 15km of the POC without the need to extend the search area any further (See EN010132/AS-004). Both Schemes are considered by the Applicant to provide viable grid connection distances.

				Section 6.4 of the Planning Statement **[REP-047]** shows that the Scheme has been subject to a detailed and sensitive iterative design process. This has taken account of the context and features of the land within the Order limits, nearby sensitive receptors and assets, information emerging from environmental surveys, feedback from stakeholders, and opportunities and constraints in order to develop a good design that balances the need to maximise the energy generation capacity of the Scheme, with the avoidance and mitigation of impacts, and provision of environmental and other enhancements, where practicable. ES Chapter 5: Alternatives and Design Evolution **[APP-040]** and the Design and Access Statement **[APP-342]** detail how the Sites and cable routes were refined. The Design and Access Statement **[APP-342]** sets out design objectives for the Scheme and paragraph 4.3.1 sets how each of the Scheme's design objectives are addressed through the proposed design measures, and how these measures will be secured in the DCO application.

WLDC-11	Alternatives and Design Evolution	Approach to site selection and alternatives	Concern raised re viable distance to grid connection point. Gate Burton specified 8km was maximum distance.	Paragraph 2.1.12 of the Site Selection Assessment **[APP-067]** explains that an initial search area was identified at a 5km radius from the POC, however this was later expanded with the clear preference of identifying land as close to the POC as possible. The search area was enlarged incrementally until suitable options were found within a 20km radius. as explained within the Site Selection Report [APP-067]. The applicant considers that the chosen sites are located close enough to the POC to provide a viable scheme.
WLDC-12	Alternatives and Design Evolution	Approach to site selection and alternatives	The site selection process is predicated upon finding sufficient land to deliver a project that meets the capacity of the grid connection offer of 600MW. WLDC contends that this approach begins from a starting position that only sites that achieve this area are acceptable and that is wholly flawed	The Statement of Need **[APP-350]** presents a detailed compelling case for why the Scheme is urgently required and at the scale proposed. This is also summarised in Section 4 of the Planning Statement **[REP-047]**. Therefore, the Applicant respectfully disagrees that it is wrong to start the site selection process from a starting point that only sites capable of achieving 600MW are acceptable. In this case, the Applicant identified a suitably sized site to deliver 600MW through the site selection process. Had this assessment process not identified a suitable site, then alternative and possibly

				smaller sites, would then have been considered. The Scheme balances the need to maximise the energy generation capacity of the Scheme, with the avoidance and mitigation of impacts, and provision of environmental and other enhancements, where practicable. This is demonstrated at Section 6 of the Planning Statement **[REP-047].**
WLDC-13	Alternatives and Design Evolution	Approach to site selection and alternatives	The 'project' is one that does not represent a single coherent project. It is a series of 4 poorly configured areas of land which have weak physical relationships between each other reflected in their separation. The piecemeal approach to site selection has had the opposite effect to meeting NPS policy requirements to minimise impacts. Due to the creation of isolated areas hosting arrays, there has been an enforced requirement for additional plant, cabling, compounds, and construction vehicle access that otherwise would not be necessary	The Applicant respectfully disagrees that the division of the site into four distinct units, i.e. (Cottam 1, 2, 3a and 3b) results in poorly configured areas of land which have a weak physical relationship with each other. This approach has enabled the amount of BMV land utilised within the Scheme to be limited to only 4.1% of the land within the Sites. Section 6.4 of the Planning Statement shows that the Scheme has been subject to a detailed and sensitive iterative design process. This has taken account of the context and features of the land within the Order limits, nearby sensitive receptors and assets, information emerging from environmental surveys, feedback from stakeholders, and opportunities and constraints in order to develop a good design that balances the need to maximise

				the energy generation capacity of the Scheme, with the avoidance and mitigation of impacts, and provision of environmental and other enhancements, where practicable. There is no guarantee that a single site of the same scale would result in fewer impacts than the application scheme. The Site Selection Assessment **[APP-067]** identified other potential development areas, but none of these scored better than the application site in the RAG assessment that was undertaken (see Section 3 Assessment Results and Annex E: Potential Development Area Proformas). The requirements for cabling and infrastructure for a single site and the resulting impacts would be dependent upon the unique location and context of the that site and the constraints that arise as a result. It is not therefore reasonable to conclude that a single site would obviously be better. Although the Scheme comprises a series of independent areas of land or Sites, they are set within an extensive agricultural landscape. With large areas of land between each of the Sites, each is set apart by their

				associated features such as robust hedgerows, woodland and tree cover, intervening settlements and the road and rail infrastructure. These independent areas of land provide more scope for the Scheme to be offset from all key receptors such as settlement edges, individual residential properties, PRoW and transport routes which further assist with its integration and dispersion across the landscape than if the Site were one composite whole. The discrete areas of land in the Scheme are placed so that the Scheme would not be perceived in its entirety and the solar panels are distributed 'in and amongst' the landscape features to assimilate them into the landscape. The provision of a solar scheme with discrete areas of land can therefore offer a more favourable approach than having a single large site, as it allows for a distributed and less obtrusive deployment of the solar panels. The presence of the intervening landscape also provides scope for areas of mitigation and the ability to build upon the connectivity of green infrastructure and ecology and nature conservation and retain the existing landscape pattern.

				In any event, paragraph 4.4.3 of NPS 1 states that *"where (as in the case of renewables) legislation imposes a specific quantitative target for particular technologies or (as in the case of nuclear) there is reason to suppose that the number of sites suitable for deployment of a technology on the scale and within the period of time envisaged by the relevant NPSs is constrained, the IPC should not reject an application for development on one site simply because fewer adverse impacts would result from developing similar infrastructure on another suitable site, and it should have regard as appropriate to the possibility that all suitable sites for energy infrastructure of the type proposed may be needed for future proposals."* In relation to the specific impacts of the plant, cabling, compounds and construction vehicle accesses for the Cottam Solar Project we would comment as follows: Landscape Comment: The identified impacts to landscape and visual receptors as a result of plant, cabling, compounds and construction is set out within the LVIA at Appendix 8.2 **[APP-074]** and Appendix 8.3 **[APP-075]**. There are

				individual receptor sheets for the Cable Routes at Appendix 8.2.11 which conclude there are not expected to be any significant effects either individually or cumulatively. All cables will be underground and no new overhead lines and associated poles will be required. The effects are therefore likely to be Minor Adverse at the construction stage. Within the shared grid connection corridor, the Cottam, West Burton, Gate Burton and Tillbridge projects have worked together to reduce the environmental impacts of the grid connections within the Joint Report on Interrelationships between Nationally Significant Infrastructure Projects **[REP-054]**. Ecology Comment: and care has been taken to select fields and land which do not contain Habitats of Principal Importance. A larger, contiguous site would risk the inclusion of such habitats (e.g. lowland floodplain grassland or woodlands) within the Order Limits and the resultant fragmentation of these habitats from the wider ecological network. As such, a more open division of sites into four units enables site selection to focus on the least ecologically constrained fields within the available land ownership. Similarly, it

				minimises the andFurthermore, for the relatively few adverse significant effects identified for the Scheme, it is considered likely that a larger, contiguous site would not have any lesser effect. Heritage Comment: The only identified impacts to heritage assets caused by additional plant, cabling, compounds and construction vehicle access between the Cottam 1, 2, 3a and 3b Sites are: At AR14 the cable route between Cottam 1d and Cottam 1c passes through a possible ditch and enclosure of unknown date/significance, and it is considered that the value of these putative archaeological remains could range from *Negligible* to *Medium.* The impacts are likely to be either *No change* or *Minor Adverse*, resulting in effects of either *Neutral* or *Slight Adverse* significance. At AR32 the cable route between Cottam 1c and Cottam 2 passes through an area of ditches and hollows of uncertain date/significance identified from air photographs. It is considered that the value of these putative archaeological remains could range from *Negligible* to *Medium.* The

				impacts are likely to be either *No change* or *Minor Adverse*, resulting in effects of either *Neutral* or *Slight Adverse* significance. At AR33 the cable route between Cottam 1c and Cottam 2 passes through an area of ditches and other features identified from geophysical survey which are thought to possibly represent Iron Age or Romano-British settlement activity. It is considered that the value of these putative archaeological remains could range from *Negligible* to *Medium.* The impacts are likely to be either *No change* or *Minor Adverse*, resulting in effects of either *Neutral* or *Slight Adverse* significance. At AR44 the cable route between Cottam 2 and Cottam 3b passes through a ditch of unknown date/significance identified from air photographs. It is considered that the value of these putative archaeological remains could range from *Negligible* to *Medium.* The impacts are likely to be either *No change* or *Minor Adverse*, resulting in effects of either *Neutral* or *Slight Adverse* significance.

				Please refer to ES Chapter 13 Cultural Heritage **[APP-048]** for more information. It is evident that the value of these potential archaeological remains has not been confirmed, and it is possible that some of them may not be of archaeological interest. Nevertheless, even if the potential archaeological remains are of *Medium* value, the effects would be, at worst, *Slight Adverse*, and therefore 'not significant' in EIA terms. Finally, in respect of the impact on traffic, the number of construction vehicle movements required to access the Sites would be anticipated to be the same as for a single site of the same scale. Access to the Scheme may be spread over more access points, reducing pressure on each one, than would be possible for a single contiguous site. ES Chapter 14: Transport and Access [**APP-049]** concludes that there are no significant effects in relation to Transport and Access as a result of the construction of the Scheme either individually or cumulatively. Within the shared grid connection corridor, The Cottam, West Burton, Gate Burton and Tillbridge projects have worked together to align access points where possible as detailed within C8.1.8

				Joint Report on Interrelationships between Nationally Significant Infrastructure Projects **[EX2/C8.1.8_A]**.
WLDC-14	Alternatives and Design Evolution	Good design	The application documents do not explain how the current design was arrived at.	Section 6.4 of the Planning Statement **[EX2/C7.5_B]** shows that the Scheme has been subject to a detailed and sensitive iterative design process. This has taken account of the context and features of the land within the Order limits, nearby sensitive receptors and assets, information emerging from environmental surveys, feedback from stakeholders, and opportunities and constraints in order to develop a good design that balances the need to maximise the energy generation capacity of the Scheme, with the avoidance and mitigation of impacts, and provision of environmental and other enhancements, where practicable. ES Chapter 5: Alternatives and Design Evolution **[APP-040]** and the Design and Access Statement **[APP-342]** detail how the design of the Sites evolved. The Design and Access Statement **[APP-342]** sets out design objectives for the

				Scheme and paragraph 4.3.1 sets how each of the Scheme's design objectives are addressed through the proposed design measures, and how these measures will be secured in the DCO application. Please also refer to the response to 1.2.30 in **C8.1.15 Applicant's Response to ExA First Written Questions [EX2/C8.1.15]**, submitted at Deadline 2.
WLDC-15	Alternatives and Design Evolution	Good design	Notwithstanding the guidance stated in the National Infrastructure Strategy, the project design has not been guided by a 'design champion'.	The Applicant has taken the Government's aim to achieve well designed infrastructure as set out in the National Infrastructure Strategy seriously in developing the Scheme. The Applicant considers it important that a person lead the design process through all stages of the project. The team has had a design champion who led the multi-disciplinary approach to the design of the scheme from the initial stages. This person led the development of plans showing key constraints to development and the site layout. He organised and led multi-disciplinary workshops to review site layouts and drove forward the design, taking into account the views of planners, the technical design team, the Applicant, transport professionals, consultation, the

				lands team and all disciplines contributing to the ES. He led development of Chapter 4: Scheme Description of the ES **[APP-039]** and reviewed the design sections of the Design and Access Statement **[APP-342 to APP-345].** He also led development of the Concept Design Parameters and Principles **[APP-352]**, in collaboration with the Applicant, to ensure firm commitments were made to key principles of design. The design champion was considered a key member of the team and became the 'go to person' when queries were raised around scheme changes, design iterations and layout. He had sufficient influence to ensure multi-disciplinary approaches were taken and the ability to listen to all perspectives and recommend a way forward. The design process was iterative and continuous. The design champion was a member of the core team, not remote from it, enabling dynamic decision making where opportunities were identified to enhance design, deliver additional benefits, reduce environmental impacts or respond to requests for changes to the design from landowners, residents, local authorities and consultees. He was supported by a collaborative team

				(including the Applicant) working towards the best outcomes. Please also refer to the response to 1.2.30, asking how the network of sites represents good design, in **C8.1.15 Applicant's Response to ExA First Written Questions [EX2/C8.1.15]**, submitted at Deadline 2.
WLDC-16	Alternatives and Design Evolution	Good design	The approach to site identification has resulted in significant adverse impacts across a wide geographical area affecting a wide range of communities.	As described in Section 6 of the Planning Statement **[EX2/C7.5_B],** whilst it has not been possible to avoid all environmental impacts these have been minimised where possible, through careful and sensitive design and detailed mitigation strategies. When considered against the NPS and NPPF, the Scheme accords with relevant policies, and with regard to specific policy tests, the national and local benefits of the Scheme are considered on balance to outweigh its adverse impacts. Paragraph 3.1.2 of NPS EN-1 acknowledges that it will not be possible to develop the necessary amounts of such infrastructure without some significant residual adverse impacts.
WLDC-17	Alternatives and Design Evolution	Approach to site selection and alternatives	The benefits of the project through the generation of low-carbon electricity from a renewable source, could be achieved by having a site that demonstrates a level of	The design of the Scheme has been demonstrated to accord with relevant planning policy as set out at Section 6.4 of the Planning Statement **[EX2/C7.5_B]** and its

			design required to accord with important and relevant policy	appendices 3 and 4. Please refer to the Applicant's responses to WLDC-13 to WLDC-16 above for further detail on how good design has been incorporated into the site selection and design of the Scheme.
WLDC-18	Cumulative Impacts	Over-arching impact upon communities	Impacts will be experienced during the construction and operation of the Cottam Energy Project and will be materially experienced cumulatively with other NSIP project proposed in the locality. The geographical sprawl of the Cottam Solar Project in excess of 16km	The Applicant does not consider that it is necessary to create a single contiguous site in order to provide a well designed scheme that minimises environmental impacts. Section 6.4 of the Planning Statement **[APP-341]** shows that the Scheme has been subject to a detailed and sensitive iterative design process. This has taken account of the context and features of the land within the Order limits, nearby sensitive receptors and assets, information emerging from environmental surveys, feedback from stakeholders, and opportunities and constraints in order to develop a good design that balances the need to maximise the energy generation capacity of the Scheme, with the avoidance and mitigation of impacts, and provision of environmental and other enhancements, where practicable. ES Chapter 5: Alternatives and Design Evolution **[APP-040]** and the Design and Access Statement **[APP-342]** detail how the Sites were refined following detailed

				ALC assessment. The Design and Access Statement **[APP-342]** sets out design objectives for the Scheme and paragraph 4.3.1 sets how each of the Scheme's design objectives are addressed through the proposed design measures, and how these measures will be secured in the DCO application. In addition, the Concept Design Parameters and Principles **[REP-039]** sets out design parameters and principles that apply across the sites. The Environmental Statement assesses the cumulative impacts of the Scheme with other projects in the area, identifying whether there are any additional impacts from the Scheme due to the presence of these other schemes. Where impacts are identified, whether from the Scheme or in cumulation with other projects, the Applicant is seeking to mitigate these where practicable. Each chapter of the ES contains a cumulative effects assessment, prepared in accordance with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and PINS Advice Note 17. Construction impacts are to be mitigated through the measures set out in the **C7.1_B**

				Outline Construction Environmental Management Plan [EX1/C7.1_B]. An Outline Construction Traffic Management Plan (CTMP) has been prepared to support the application within **C6.3.14.2_B ES Appendix 14.2 Outline Construction Traffic Management Plan [EX2/C6.3.14.2_B],** and is secured by Requirement 15 in Schedule 2 to **C3.1_C Draft Development Consent Order Revision C [EX2/C3.1_C].**
WLDC-19	Scheme Description	Impacts of operation and maintenance	All of the PV Panels will require replacement once during the Scheme's design life, with a further 10% requiring replacement to cover equipment failures, at a constant rate throughout the 60-year project life. This means that there will be continued works throughout the scheme which is likely to cause disruption to the local residents.	The number of panels forecast to be used for the Scheme has been generated based on **C6.4.4.1-7 ES Figures 4.1-4.7 Illustrative Site Layout Plans [APP-152** to **APP-158]**. For the purpose of assessment in **C6.2.7_A ES Chapter 7 Climate Change Revision A [REP-014]** and **C6.2.20 ES Chapter 20 Waste [APP-055]** this is approximately 1.3 million individual panels (Table 20.7 **[APP-055]**). For the purpose of assessment in **C6.2.7_A ES Chapter 7 Climate Change Revision A [REP-014]** and **C6.2.20 ES Chapter 20 Waste [APP-055]**, a replacement rate of 0.4%, or around 5,300 panels per annum (Table 20.6 **[APP-055]**). Paragraph 14.7.70 of

				C6.2.14 ES Chapter 14 Transport and Access [APP-049] 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. Suitable mitigation for any operational impacts is secured in **C7.16 Outline Operational Environmental Management Plan [APP-353**by way of Requirement 14 of Schedule 2 to **C3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C]**.
WLDC-20	Trasnport and Access Socio-economics, Tourism and Recreation	Community culture and well being Recreation	The proliferation of construction traffic for 5 years or more will discourage the use of rural highways for recreation use, resulting in a further negative impact upon the wellbeing and mental health of local residents and people using the district for leisure purposes.	Impacts of construction traffic on the pleasantness of highway use by recreational and non-vehicular users has been assessed in **C6.2.14 ES Chapter 14 Transport and Access [APP-049]** under the determinant of pedestrian delay and pedestrian amenity (both to include cyclists and equestrians). This has found (at Table 14.22 and Table 14.23) that there is no more than a minor adverse effect, which is not significant.

				The effect of fear and intimidation on the desirability of rural routes for recreational use has also been considered in **C6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-053]** on the basis of the findings in the Transport and Access ES chapter. Whilst it is recognised that there will be a degree of discouragement as a result of fear and intimidation, this is also assessed as being not significant. Mitigation measures set out in **C6.3.14.2 B ES Appendix 14.2 Construction Traffic Management Plan Revision B [EX2/C6.3.14.2_B]** seek to reduce these effects as much as possible through ensuring HGV drivers comply with the prescribed access routes, and are suitably accompanied by banksmen to ensure safe entry and egress from the Sites. A full set of measures is set out in Section 7 of the **C6.3.14.2 B ES Appendix 14.2 Construction Traffic Management Plan Revision B [EX2/C6.3.14.2_B].**
WLDC-21	Landscape and Visual Impact	Land use character	The landscape itself is strongly characterised by large open fields for intense agricultural use. The removal of this land use to be replaced by large scale	The Applicant notes this comment. The Landscape and Visual Impact Assessment (LVIA) contained within **C6.2.8_A ES Chapter 8 Landscape and**

			utilitarian photovoltaic solar arrays and their associated development, will result the direct removal of this cultural land use character, significantly harming the way in which communities perceive and relate to the place in which they live. This significant change for a period of over half a century will inevitably degrade the character and culture of the West Lindsey District and negatively impact the connection communities have with it.	**Visual Impact Assessment Revision A [EN010133/EX2/C6.2.8_A]** takes into account the effects on the landscape character in detail, from the national scale, through regional, county district and local scales to the landscape character areas within the 5km Study Area. This includes consideration that some parts of the 5km Study Area are characterised by large open fields for agricultural use. For further information, please refer to **C6.3.8.2_A ES Appendix 8.2 Assessment of Potential Landscape Effects Revision A [REP-020]**. These associated appendices provide a detailed assessment of landscape effects on each landscape receptor including the changes to landscape character and the removal of some features. Mitigation, including offsets and planting, has been proposed to address and minimise adverse effects on the character of the landscape. This is in line with the agreed methodology and the hierarchy of approach advocated by the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition and was agreed with LCC at the series of workshops, as set out in **C6.3.8.4 ES Appendix 8.4 Consultation [APP-076]**.

				The mitigation associated with the landscape receptors for the Scheme is set out in **C7.3_B Outline Landscape and Ecological Management Plan [EN010133/EX2/C7.3_B]**, **C6.4.8.16.1_A to C6.4.8.16.10_A Landscape and Ecology Mitigation and Enhancement Plans** (Figures 8.16.1 to 8.16.10) **[REP-024 to REP-035]** and secured by Requirement 7 of Schedule 2 of **C3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C]**. The LVIA considers the delivery of landscape mitigation to landscape character by addressing biodiversity net gain through the enhancement of existing habitats and green infrastructure. The Outline LEMP also prescribes how the landscape and ecology mitigation measures identified and proposed would be implemented and managed to ensure the effectiveness and certainty in achieving the objectives.
WLDC-22	Human Health Major Accidents and Disasters	BESS Fire safety	concerns over the safety risk of fire resulting from BESS infrastructure. Assurances will be sought regarding how such risks will be minimised and addressed in the event of an incident	The BESS system selected at the detailed design stage will include integrated fire and explosion protection systems. Following industry good practice (e.g., NFPA 855 2023) or based on 3rd party fire & explosion testing, gas venting systems will avoid build-up of explosive gases. A site-specific

				Emergency Response Plan will be developed for the BESS post consent based on national and international best practice measures. The battery system mitigation measures adopted in a final Battery Storage Safety Management Plan [APP-348; revised at Deadline 2], will reflect the latest BESS safety codes and standards applicable at that stage. Mitigation measures will be discussed and coordinated with LFRS. A Failure Modes and Effects Analysis (FMEA) of the BESS (BS EN IEC 60812) will be conducted to lay the foundation for predictive maintenance requirements and complement the fault indicator capabilities of the BMS data analytics system. Comprehensive Hazard Mitigation Analysis (HMA) will be conducted by a BESS specialist independent Fire Protection Engineer following NFPA 855 (2023) guidelines and recommendations. Additional risk assessments likely to be conducted at the detailed design stage are Fire Risk Analysis (FRA), Explosion Risk Analysis (ERA), Hazard and Operability Analysis (HAZOP). BESS 3rd Party risk

				analysis is sometimes automatically provided by Tier one BESS manufacturers and / or BESS integrators. If the BESS system supplied differs from the specification considered for risk assessments and consequence modelling, then a full safety audit will be repeated for the new BESS system specification. These studies will be completed and signed off before construction commences
WLDC-23	Transport and Access Scheme Description	Construction activities	disruption caused by construction and operational traffic to local communities will be significant and will have an extremely negative impact upon day-to-day life	The effects of the Scheme in Transport and Access terms are set out in **ES Chapter 14: Transport and Access [APP-049]** and the **C6.3.14.1 ES Appendix 14.1 Transport Assessment [APP-134].** As set out in paragraph 14.1.3 of the **ES Chapter 14: Transport and Access [APP-049]** solar farm developments do not generate significant traffic flows once operational. Typically, there will be only a handful of trips per month by Transit Van (or similar) for maintenance purposes (less than one vehicle trip per day on average). Therefore, all operational effects are negligible. An Outline Construction Traffic Management Plan (CTMP) has been

				prepared to support the application within **C6.3.14.2_B ES Appendix 14.2 Outline Construction Traffic Management Plan [EN010133/EX2/C6.3.14.2_B]**. **C3.1_C Draft Development Consent Order Revision C [EN010133/EX1/C3.1_C]**, 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." The outline CTMP submitted as part of the DCO application provides a framework for the management of construction vehicle movements to and from the Scheme, to ensure that the effects of the temporary construction phase on the local highway network are minimised and made acceptable.

				C7.1_B Outline Construction Environmental Management Plan Revision B [EN010133/EX2/C7.1_B] (CEMP) sets out measures to control and mitigate against significant adverse from the construction activities of the Scheme. The provision of a detailed CEMP is secured by Requirement 13 of Schedule 2 of **C3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C]**. Similarly, **C7.16_A Outline Operational Environmental Management Plan Revision A [EN010133/EX2/C7.16_A]** (OEMP) sets out measures to control an mitigate against significant adverse from the construction activities of the Scheme. The provision of a detailed CEMP is secured by Requirement 14 of Schedule 2 of **C3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C]**.
WLDC-24	Transport and Access Socio-Economics, Tourism and Recreation	Construction activities	The increase in construction traffic using the rural highway network will increase the perception of a decrease in highway safety, making it less attractive to local communities to use the network for recreational purposes in particular.	The effect of fear and intimidation on the desirability of rural routes for recreational use has also been considered in **C6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-053]** on the basis of the findings in **ES Chapter 14: Transport and**

				Access [APP-049]. Whilst it is recognised that there will be a degree of discouragement as a result of fear and intimidation, this is also assessed as being not significant.
WLDC-25	Socio-Economics, Tourism and Recreation	Construction activities	The influx of construction activity and workers over a period in excess of 5 years will place pressure on accommodation and local services in the area.	Impacts on the local communities are anticipated to be limited, and the measures set in place in Table 3.8 of the outline Construction Environmental Management Plan **[EN010133/EX2/C7.1_B]** provide a sufficient framework to mitigate undue levels of disruption. Management of overlapping construction activities across the Sites or across cumulative NSIP or construction projects are based on utilising the existing flexibility in the Scheme's construction schedule to minimise peaks in construction activities at certain times, or in specified locations. This is intended to address such issues, for example, as demand for temporary accommodation by construction workers, or cumulative traffic impacts on roads causing delay or severance where a road is utilised for multiple projects. Where temporary worker accommodation is in short supply, there are measures to accommodate these workers in temporary

				private rental accommodation, so as to avoid undue disruption to accommodation services and visitor accommodation. Temporary construction workers will also be directed towards primary healthcare facilities with the greatest level of capacity to avoid undue disruption or burden on primary healthcare providers in areas where access to healthcare providers, or GPs and healthcare staff are a limited resource. This will be managed throughout the construction period using practice-specific data available through the NHS Digital Data Services webapp.
WLDC-26	Socio-Economics, Tourism and Recreation	Construction activities	The long construction period (both individually for the Cottam scheme and cumulatively with other solar projects) will have an impact on the desirability to live in the locality, resulting in concerns regarding the value of properties and businesses	Impacts for the construction of the Scheme in isolation and cumulatively with the other NSIPs in the locality have been assessed throughout the **Environmental Statement [APP-036** to **APP-058]**, and where adverse effects have been assessed, these have been proposed to be mitigated through the measures set out in the management or control documents secured by the Requirements in Schedule 2 of **C3.1_C Draft Development Consent Order Revision C [EX2/C3.1_C]**. Although the desirability of the locality as a place to live is indirectly affected of the Scheme's construction and

				thus has not been assessed as a standalone factor, the Applicant is confident that the outcome of the Environmental Impact Assessment demonstrates that the overall impact on residential amenity will not be significant. Property value is not a material consideration in the consideration and determination of DCOs, and has therefore not been assessed. With regard to the value of local business, those that are likely to affected, such as agricultural businesses, accommodation service businesses, and wider tourism and recreation sector businesses have been assessed in the context of the assessment of the impacts on sector employment and economic performance across the Local Impact Area as a result of impacts from the Scheme in **C6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-053]**.
WLDC-27	Landscape and Visual Assessment	Landscape character and Visual impacts	The scheme will cause significant harm to the landscape character of the area, altering it from its agricultural use and character potentially irrevocably. The visual	The Applicant notes this comment. The Landscape and Visual Impact Assessment (LVIA) contained within **C6.2.8_A ES Chapter 8 Landscape and Visual Impact Assessment Revision A**

			effects on communities and visitors will be significant.	**[EN010133/EX2/C6.2.8_A]** takes into account the effects on the landscape character in detail, from the national scale, through regional, county district and local scales to the landscape character areas within the 5km Study Area. For further information, please refer to **C6.3.8.2_A ES Appendix 8.2 Assessment of Potential Landscape Effects Revision A [REP-020]**. These associated appendices provide a detailed assessment of landscape effects on each landscape receptor including the changes to its agricultural use and character. Mitigation, including offsets and planting, has been proposed to address and minimise adverse effects on the character of the landscape. This is in line with the agreed methodology and the hierarchy of approach advocated by the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition and was agreed with LCC at the series of workshops, as set out in **C6.3.8.4 ES Appendix 8.4 Consultation [APP-076].** The LVIA identifies the Scheme as causing a significant change to high and medium sensitivity receptors and several close-range views have been assessed as beneficial for

				example, within the Cottam 3 Site, the PRoW footpath (Pilh/20/1) connects at the junction with Bonsdale Lane. This is set out in **C6.3.8.3_A ES Appendix 8.3 Assessment of Potential Visual Effects Revision A [EN010133/EX2/C6.3.8.3_A]** on sheet [EN010133/APP/C6.3.8.2.3.25] Viewpoint VP58 – Junction of Pilh/20/1 and Bonsdale Lane. In this instance [page 3] at Operation (Year 15) the view will have become more enclosed since the proposed new hedgerows will have established to create a strong field structure and screen views of the panels. The visual benefits are identified, alongside the effects within the detailed receptor sheets. The mitigation associated with the landscape receptors for the Scheme is set out in **C7.3_B Outline Landscape and Ecological Management Plan [EN010133/EX2/C7.3_B]**, C6.4.8.16.1 to C6.4.8.16.10 Landscape and Ecology Mitigation and Enhancement Plans (Figures 8.16.1 to 8.16.10) **[APP-305 to APP-315]** and secured by Requirement 7 of Schedule 2 of **C3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C]**. The LVIA considers the delivery of landscape

				mitigation to landscape character by addressing biodiversity net gain through the enhancement of existing habitats and green infrastructure. The Outline LEMP also prescribes how the landscape and ecology mitigation measures identified and proposed would be implemented and managed to ensure the effectiveness and certainty in achieving the objectives.
WLDC-28	Landscape and Visual Assessment	Landscape and Visual Impacts	WLDC disputes the Applicant's contention that the impacts of the development are temporary and reversable.	The Applicant notes this comment. **C6.2.8_A ES Chapter 8 Landscape and Visual Impact Assessment Revision A [EN010133/EX2/C6.2.8_A]** (the 'LVIA') considers both the potential long-term and short-term effects of the Scheme and whether they are temporary or reversable. These potential impacts take into account the landscape character and the visual receptors in accordance with Paragraphs 2.16, 3.22, 3.24, 3.27, 5.35, 5.51 and 6.41 of '*Guidelines for Landscape and Visual Impact Assessment, Third Edition*' (GLVIA3) by the Landscape Institute and Institute of Environmental Management and Assessment and the LVIA methodology agreed with Lincolnshire County Council.

				The LVIA has taken account of both the landscape and visual impact of the solar panels/arrays and explored all options for minimising any potential long-term and short-term effects of the Scheme and this is set out within **C6.3.8.2_A ES Appendix 8.2 Assessment of Potential Landscape Effects Revision A [REP-020]** and **C6.3.8.3_A ES Appendix 8.3 Assessment of Potential Visual Effects Revision A [EN010133/EX2/C6.3.8.3_A]**. Please refer to response NE12 in **C8.1.2 The Applicant's Responses to Relevant Representations [REP-049]** confirming the Scheme will result in improved soil health.
WLDC-29	Landscape and Visual Assessment	Landscape and Visual Impacts	WLDC strongly refutes the conclusions reached in the ES that the construction of this extensive solar farm project will lead to an 'improvement' in local or regional landscape character.	The applicant notes this comment. The mitigation proposals associated with the landscape and visual receptors for the Scheme will lead to an improvement in both local and regional character. These mitigation proposals are included in **C7.3_B Outline Landscape and Ecological Management Plan [EN010133/EX2/C7.3_B]**, and within **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-305 to APP-315]. This mitigation is aimed at benefitting the community as a whole as well as tourists, visiting walkers, local residents, ornithologists and cyclists. The landscape mitigation measures seek to provide new planting, which will include new native hedgerows and tree cover, and this will also include their management and maintenance. Mitigation, including offsets and planting, has been proposed to address and minimise adverse effects on the character of the landscape, expand existing woodlands 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. The assessment provides a comprehensive understanding of the potential impacts of the Scheme, including any changes to landscape character from the infrastructure such as the solar arrays, access roads, security fencing, lighting and substations. Please refer to the individual receptor sheets at **C6.3.8.2_A ES Appendix 8.2 Assessment of Potential Landscape**

				Effects Revision A [REP-020] and **C6.3.8.3_A ES Appendix 8.3 Assessment of Potential Visual Effects Revision A [EN010133/EX2/C6.3.8.3_A]**.
WLDC-30	Landscape and Visual Assessment	Landscape and Visual Impacts	The applicant has an over-reliance on landscape planting to integrate and screen the development. Whilst this may reduce visual impact, it will not achieve the screening of the entirety of the development and thus adverse visual impacts will occur	The Applicant notes this comment. Adverse landscape and visual impacts have been reduced as far as possible through the implementation of mitigation measures. The proposed planting is unlikely to completely obscure all aspects of the Scheme, as the LVIA acknowledges, there are some residual adverse effects, but the effectiveness of the planting, whether as a screening or softening measure is set out in the individual receptor sheets at **C6.3.8.3_A ES Appendix 8.3 Assessment of Potential Visual Effects Revision A [EN010133/EX2/C6.3.8.3_A]**.
WLDC-31	Cultural Heritage	Impacts on heritage assets	There will be several significant impacts on designated heritage assets including Scheduled Monuments and Grade I listed buildings. This will have a long term impact on these local assets. Although some of the affects are considered not significant, there are multiple slight adverse impacts which, when considering the impact of a proposed development on the significance	The Applicant notes this comment. With the proposed mitigation in place, the Applicant highlights that **C6.2.13 ES Chapter 13 Cultural Heritage [APP-048]** concludes in Tables 13.37 - 13.39 that there would be moderate adverse (I.e., 'significant') effects at one Scheduled Monument, *Thorpe medieval settlement* (NHLE 1016978).

			of a designated heritage asset, great weight should be given to the asset's conservation. This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.	Please refer to CUL-02 in **C8.1.19 Applicant's Responses to Written Representations Part 3**, submitted at Deadline 2, for more information..
WLDC-32	Transport and Access	Construction access to the Sites	There are multiple site accesses being created, particularly in the construction phase. Each access will result in many minor roads experiencing a significant increase in traffic levels and non-domestic construction vehicles.	Please refer to the response to WLDC-13, above, setting out the reasons why the Applicant does not consider that there are greater environmental impacts from the use of a network of sites, to a single contiguous site. The effects of the Scheme in Transport and Access terms are set out in **ES Chapter 14: Transport and Access [APP-049]** and the **C6.3.14.1 ES Appendix 14.1 Transport Assessment [EX2/C6.3.14.1_A].** As set out in paragraph 14.1.3 of the **ES Chapter 14: Transport and Access [APP-049]** solar farm developments do not generate significant traffic flows once operational. Typically, there will be only a handful of trips per month by Transit Van (or similar) for maintenance purposes (less than one vehicle trip per day on average). Therefore, all operational effects are negligible.

				An Outline Construction Traffic Management Plan (CTMP) has been prepared to support the application within **C6.3.14.2_B ES Appendix 14.2 Outline Construction Traffic Management Plan [EN010133/EX2/C6.3.14.2_B]**. **C3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C]**, 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." The outline CTMP submitted as part of the DCO application provides a framework for the management of construction vehicle movements to and from the Scheme, to ensure that the effects of the temporary construction phase on the local highway

				network are minimised and made acceptable. Please also refer to reference WLDC-35, below.
WLDC-33	Transport and Access	Traffic surveys	WLDC consider that more recent traffic surveys should be considered to verify that the derived baseline traffic flows are representative of current day conditions.	As set out in Paragraph 2.15 of the **C6.3.14.1 ES Appendix 14.1 Transport Assessment [APP-134],** traffic surveys were undertaken between 2nd November 2021 and 8th November 2021. At the time, there were no Covid-19 restrictions in place. Covid-19 restrictions ended in July 2021. To get to a base year of 2025, which is considered a reasonable start time for construction, TEMPro growth factors, which have been adjusted in line with the National Traffic Model (NTM), have been applied to the observed traffic flows. This is an industry standard process adopted by the Department for Transport. The TEMPro software considers future changes in traffic flows. Therefore, the traffic flows are robust.
WLDC-34	Transport and Access	Temporary highway works	It is unclear to WLDC if the potential environmental effects due to any temporary highway works necessary to	The environmental effects of the removal of hedgerows are considered in **C6.2.9 ES Chapter 9_Ecology and Biodiversity [APP-044]** In certain locations where existing

			accommodate access by large construction vehicles and abnormal loads, that may require the removal of hedgerows for example, have been covered by the ES. WLDC requests clarification from the applicant on this matter	accesses do not exist, some very minor hedgerow removal is necessary to accommodate the access road between fields, land areas and solar panel areas. This removal is set out in **C7.3 Outline Landscape and Ecological Management Plan A [APP-339]** (the 'OLEMP') which is revised and secured by **Requirement 7 of Schedule 2 to C3.1_C Draft Development Consent Order Revision C [EX2/C3.1_C]**. This removal will involve only very short sections of hedgerow to accommodate internal access roads and will not involve loss of trees, in particular the Applicant does not intend to remove any trees protected under any Tree Preservation Orders (TPOs). These plans also show hedgerow works (pruning and removal) associated with temporary highway works necessary to accommodate access by large construction vehicles and abnormal indivisible load (AIL) requirements.
WLDC-35	Transport and Access	Access to the Sites	It is questioned why so many accesses are needed and highlights the issue around the use of a 'network of sites'.	Please refer to the response to WLDC-13, above, setting out the reasons why the Applicant does not consider that there are greater environmental impacts from the use of a network of sites, to a single contiguous site.

				There will be 17 access points associated with the main 'solar array' element of the Scheme across Cottam 1, 2, 3a and 3b. Of these, 14 will be used for construction vehicle access, one will be for abnormal load access and two will be operational only. Where possible, internal access tracks will be constructed to connect different land parcels. Where this is not possible, access from the public highway is identified. For the most part, existing field accesses are utilised which will be formalised for the construction phase. There will be 31 accesses throughout the cable route corridor for the grid connection, which is 27.5km in length. The cable route corridor enabling the grid connection will be built out in 4.4km sections over a 24-month period. Each section will take approximately 90 working days to construct. Within each section there will be approximately four accesses. Each access will be used for approximately 90 days only. As set out in paragraph 9.15 of the **C6.3.14.1_A ES Appendix 14.1 Transport Assessment [EX2/C6.3.14.1_A],** each access is only forecast to generate eight arrivals and eight departures per day (half by 10m tipper, half by LGV). Additional information is set out in

				Section 4 of the **C6.3.14.1 ES Appendix 14.1 Transport Assessment [EX2/C6.3.14.1_A].**
WLDC-36	Socio-Economics, Tourism and Recreation	Tourism	The Cottam Solar Project will have an significant negative impact on the local tourism sector, causing damage to its image and recovery	The Applicant respectively disagrees with this position. The Applicant has assessed impacts on the tourism and recreation industry for both the Scheme in isolation and cumulatively with other NSIPs in West Lindsey in **C6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-053]**. The assessment has taken into account the scale of the local tourism economy in the context of its contribution towards the economy for Lincolnshire, and the impacts of COVID on inbound and domestic visitor trends has been accounted for in the determination of the sensitivity of the tourism industry with regard to employment and economic performance. The assessment has found no significant impacts to the tourism and visitor economy or employment sector. Please refer to response BLPC-06 in **C8.1.2 The Applicant's Responses to Relevant Representations [REP-049]** for more information.

WLDC-37	Socio-Economics, Tourism and Recreation	Employment	The Scheme will result in the loss of approximately 17 agricultural sector jobs in the Local Impact Area. It is claimed that these jobs will return following the decommissioning of the Scheme; however, following a 40 year gap in employment it is difficult to determine whether these jobs will realistically return	The Scheme is anticipated to lead to a maximum loss of approximately17 full-time equivalent agricultural jobs, based on the total number of employees working at the four farm businesses that cover the Scheme, as identified in Section 7 of **C6.3.19.1 ES Appendix 19.1 Agricultural Land Quality Soil Resources and Farming Circumstances [APP-145]**. Based on the requirement for the land to be reinstated to its present use and condition after decommissioning of the Scheme, it would be expected that a similar level of employment would be required to farm the land once agricultural uses recommence on the land in full. Please refer to response WSPC-09 in **C8.1.2 The Applicant's Responses to Relevant Representations [REP-049]** for information about the jobs created by the Scheme during construction and operation, and the overall economic benefit of the Scheme to the local area..
WLDC-38	Soils and Agriculture	Best and Most Versatile land/Agriculture	It is not clear if, as a consequence of the scheme, farming tenants will be displaced. In the absence of such information, WLDC raise significant concerns about what	Section 7 of **C6.3.19.1 ES Appendix 19.1 Agricultural Land Quality Soil Resources and Farming Circumstances [APP-145]** identifies that the solar array sites of the Scheme are operated and farmed by four landowner business, thus demonstrating

			would be an unquantified adverse socio-economic effect.	that no tenant farmer will be displaced by the Scheme for its operational lifetime. Tenant farmers may be affected by the construction of the grid connection within the Cable Route Corridor. Impacts would be temporary, occurring during construction only, and only as is necessary to facilitate the trenching and laying of cables. These works will be limited to the Cable Route Corridor, leaving the rest of any affected field available for continuous agricultural use. In the absence of a voluntary agreement with the tenant, any tenant farmer affected by the exercise of compulsory acquisition or temporary use powers would be compensated for any loss or damage resulting from the Scheme's interference with their land interests, in accordance with the Compensation Code. This is explained in further detail in the **C4.1_A Statement of Reasons [AS-013].**
WLDC-39	Soils and Agriculture	Best and Most Versatile land/Agriculture	The cumulative assessment is based upon an absence of site specific assessments which are required to determine Agricultural Land Classification (ALC). It is accepted that during the authoring of this chapter the information for other projects	Agricultural land is not lost to or degraded by the presence of solar farms. Farmland within solar sites can remain in agricultural production for the duration of the solar farm's operation for uses such as grazing livestock.

			may not have been available, however, given Gate Burton and West Burton are both now accepted or are already in the examination process it is presumed the data for the other schemes is now available to allow an adequate assessment to be carried out	Please also refer to response SPM-03 and NE12 in **C8.1.2 The Applicant's Responses to Relevant Representations [REP-049]** in respect of the use of agricultural land and the benefits of improved soil health from the Scheme. Additionally, please refer to the **Joint Report on Interrelationships between Nationally Significant Infrastructure Projects [EX2/C8.1.8_A]** which provides information on the interrelationships between the Gate Burton Energy Park, Cottam Solar Project, West Burton Solar Project and Tillbridge Solar Project. The report has been prepared to support the Development Consent Order (DCO) applications for the four projects. Each assessment has been prepared by competent experts, and contains an assessment of soils and land use.
WLDC-40	Ecology and Biodiversity	Scope of assessment	The ES assessment does not appear to include any consideration of combustion emissions from on-site plant or transport to the site. If this matter has been scoped out of the EIA, it would be helpful for the	Air quality impacts are assessed within C6.2.17 Environmental Statement Chapter 17_Air Quality [**APP-52**] which includes potential impacts on human and ecological receptors where considered necessary. Construction traffic air quality impacts were scoped out of this assessment. Please see

			applicant to clarify that this is the case and provide an updated justification.	**C6.3.2.2 ES Appendix 2.2 EIA Scoping Opinion [APP-064]**.
WLDC-41	Ecology and Biodiversity	Scope of assessment	The Scoping Opinion, item ID 2.2.1, indicates that the applicant should include decommissioning of West Burton A in the ES cumulative assessment, but this does not seem to be included in Chapter 9 Section 9.9. WLDC seeks clarification from the applicant as to why this decision has been made contrary to the Scoping Opinion	The Scoping Opinion states that [with added emphasis]: "The ES should include West Burton A decommissioning in the cumulative assessment *where there is potential for likely significant effects*." Plans and projects brought forward for consideration within the Applicant's cumulative assessment of ecological effects were those which were considered to be within the Zone of Influence of the Scheme, namely Tillbridge Solar Project, Gate Burton Energy Park, West Burton Solar Project and the Shared Cable Corridor element of the last three projects and the Scheme. As such, the decommissioning of West Burton A was not deemed to be within the ZoI of the Scheme and therefore was not assessed, as it was considered that there was no potential for likely significant effects. This decision was taken since the decommissioning work would not be expected to impact significant areas of habitats or ecological features for which there would be a functional linkage to the Scheme, or a functional linkage to the other

				considered projects when assessed in combination.
WLDC-42	Ecology and Biodiversity	Assessment outcomes	Chapter 9 paragraph 9.7.82 (and Table 9.3) of the ES concludes that a beneficial effect significant at a district level for grassland will be realised and this is welcomed. WLDC requires further clarification, and information if required, to ensure that the mitigation proposed is adequate to justify the conclusions	The conclusion of a beneficial effect on grassland, significant at a district level, is based on the detail included in the C7.3_A Outline Landscape and Ecological Management Plan [EN010133/EX1/C7.3_A] which sets out how the grassland habitat will be created, managed and monitored over the lifetime of the project. The grassland to be created includes 800ha of new seeded, diverse grassland within PV arrays, 94ha of tussocky grassland at field margins, 80ha of flower-rich pollinator seeding at field margins and easements and 39ha of tall herb-rich grassland habitat at field margins. Under a Requirement of the DCO, a detailed version of the LEMP will need to be approved by the relevant local authority which must be substantially in accordance with the Outline LEMP. This will include fully detailed Method Statements and diaries, as well as the details of personnel and organisation responsible for its delivery. As per Requirement 7 of Schedule 2 of C3.1_B Draft Development Consent Order Revision B [EN010133/EX1/C3.1_B], "No part of the

				authorised development may commence until a written landscape and ecological mitigation plan has been submitted to and approved by the relevant planning authority for that part or, where the part falls within the administrative areas of multiple relevant planning authorities, each of the relevant planning authorities." Due to the large extent of newly created grassland to be managed and monitored over the lifetime of the Scheme.
WLDC-43	Ecology and Biodiversity	Assessment outcomes	Chapter 9 para 9.9.19 of the ES states that : 'However, there is the potential for increased temporary, but medium/long term fragmentation or disturbance effects on species like bats, badgers, hedgehogs, reptiles, amphibians and harvest mice which utilise field margins especially.' WLDC considers this statement to be unclear, and requests further information to demonstrate that there will be no significant cumulative impacts	Please refer to the response to question 4 of WLDC 8.1.1in **Local Impact Report document [C8.1.16].**
WLDC-44	Ecology and Biodiversity	OLEMP	The Outline LEMP (APP/C7.3: Landscape and Ecological Management Plan: Outline Plan) contains a number of important measures that are relied on for the conclusions in Chapter 9. However, in	The Outline LEMP is secured through Requirement 7 of Schedule 2 of C3.1_B Draft Development Consent Order Revision B [EN010133/EX1/C3.1_B]. If WLDC have any

			places these measures lack confirmed detail. Further detail to confirm that these measures will be secured is required in order to fully support the conclusions in the Chapter	specific points of concern, we would then be able to consider these.
WLDC-45	Ecology and Biodiversity	HRA	WLDC considers that the conclusions as presented in App/C7.20 'Information to Support a Habitat Regulations Assessment: Cottam Solar Project' (the 'ISHRA') to be reasonable However, WLDC maintains a concern that there may be a possibility that some effect pathways have been overlooked and request that the applicant provides clarification/more certainty in this regard	The applicant considers that the C7.20 - Information to Support a Habitat Regulations Assessment: Cottam Solar Project (the 'ISHRA') [APP-357] contains all the necessary information to determine that there would be no conceivable effect on any European site and its qualifying features as a result of the Proposed Development. If WLDC have any specific effect pathways that have been overlooked, we would be able to consider these.
WLDC-46	Ecology and Biodiversity	HRA	It appears to WLDC that there are elements missing from the Habitat Regulations Report submitted as part of this Scheme and requests that the applicant provides further clarification with direct reference to Advice Note 10	The applicant considers that the C7.20 - Information to Support a Habitat Regulations Assessment: Cottam Solar Project (the 'ISHRA') [App-357] contains all the necessary information to determine that there would be no conceivable effect on any European site and its qualifying features as a result of the Proposed Development, according to PINS Advice Note 10. If there is any specific information that WLDC considers missing from the ISHRA, we would be able to consider these.

WLDC-47	Ecology and Biodiversity	Ramsar sites	ISHRA para 4.1.1 appears to be misleading with regard to Ramsar sites. WLDC considers that there is the potential for the Ramsar Sites to have been overlooked by this assessment	The only Ramsar Site within the potential Zone of Influence of the Scheme is the Ramsar Site associated with the Humber Estuary which shares its designated features and geographical extent with the Humber Estuary SAC and SPA, therefore is fully covered by the assessment of potential significant effects for the Humber Estuary SAC & SPA.
WLDC-48	Ecology and Biodiversity	Use of information available from cumulative projects	The Applicant's assessment is based primarily on the assumed knowledge of the other solar schemes in the West Lindsey District. Whilst it is understood that the Applicant may not have had access to the data of the other schemes when producing the ES, the Gate Burton and West Burton schemes are both in the examination process and therefore have published all their information	Please refer to document C8.1.8 Joint Report on Interrelationships between Nationally Significant Infrastructure Projects [**EX2/C8.1.8**]_A. This document updates the assessment of cumulative effects in the light of the publication of full information relating to Gate Burton and Tillbridge Solar Projects.
WLDC-49	Ecology and Biodiversity	Shared Cable Route BNG	The Applicant has based the Shared Cable Route Corridor on a construction programme taking 18 months in the Ecology and Biodiversity chapter. This differs from the Gate Burton scheme which accounts for a 24-36 month construction	The 18 month construction programme was chosen within the ES Chapter 9 assessment to be in keeping with that of the ES overall (see C6.2.4. ES Chapter 4 Scheme Description Revision A). This was chosen as the most appropriate timespan should the scheme be assessed in isolation from the

			period. If the cable route were to take longer than this then it is expected that the BNG calculations should be revisited	other development. A five year duration was factored into the cumulative assessment of the shared cable corridor as the maximum duration of the sequential cable construction programme.
WLDC-50	Transport and Access	Cumulative impacts from cable works	WLDC contend that the Secretary of State must consider the cumulative construction traffic impact and carry out an assessment against the relevant policy framework.	Cumulative effects are set out in ES Chapter 14: Transport and Access **[APP-049]** and at Chapter 10 of the **C6.3.14.1_A ES Appendix 14.1 Transport Assessment [EN010133/EX2/C6.3.14.1_A]**
WLDC-51	Transport and Access	Abnormal Indivisible Loads	It is noted that there will be 'a small number of abnormal load movements to transport large transformers'; however, exact numbers are not provided. WLDC request that these number be provided to enable an adequate cumulative assessment to be made	Please refer to the responses to WLDC 10.15, WLDC 10.16, WLDC 10.17, WLDC 10.18 in the **C8.1.16 Applicant's Response to Local Impact Reports [EN010133/EX2/C8.1.16]**. Information on Abnormal Indivisible Load (AIL) movements is set out in Section 7 on the **C6.3.14.1_A ES Appendix 14.1 Transport Assessment [EN010133/EX2/C6.3.14.1_A]** and Section 6 of the **C6.3.14.2_B ES Appendix 14.2 Outline Construction Traffic Management Plan [EN010133/EX2/C6.3.14.2_B]**. There will be a total of 10 AIL movements associated with the solar array element of the Scheme. The majority of vehicles will be 36m in length,

				with five movements for the largest transformers on vehicles of 70m in length. For the grid connection corridor, cable drums will be brought on a 30 tonne Cable Reel Trailer. The vehicle will be 26m in length (vehicles over 18.65m are classified as 'abnormal'). As set out in paragraph 7.7 of the **C6.3.14.1_A ES Appendix 14.1 Transport Assessment [EN010133/EX2/C6.3.14.1_A]** there could be up to 25 of these deliveries per access (one every 3-4 days during the 90-day period). As stated from paragraph 7.15 of the **C6.3.14.1_A ES Appendix 14.1 Transport Assessment [EN010133/EX2/C6.3.14.1_A]** traffic management will be in place for all AIL movements into the Sites including temporary or 'rolling' road closures and vehicle escorts. The exact nature of the traffic management will be agreed with the local highway authority and police prior to the movement taking place.
WLDC-52	Transport and Access	CTMP	The level of information provided in the ES and sought to be controlled through the Construction Environmental Management Plan (CEMP) and the Construction Traffic Management Plan (CTMP) is inadequate. WLC consider that the impacts of just two	The cumulative assessment is set out in Section 10 of the C6.3.14.1 ES Appendix 14.1 Transport Assessment [APP-134]. The key roads that will be affected if all schemes are constructed at the same time are the A15,

			project being constructed wither concurrently or in sequence could result in unacceptable impacts that fail to comply with policy. WLDC request that more detail be provided in the draft 'Plans' cited above to explain how concurrent projects will be co-ordinated.	A1500 and A631. All of these roads are A-Roads. In the very unlikely case that peak construction coincides for all four schemes, HGVs will be distributed around the highway network. For example, HGVs associated with Cottam will use the A1500, Ingham Lane/Stow Lane, the A631 and B1205. Vehicles associated with West Burton will use the A1500, A57 and B1241. The Gate Burton HGV route utilises the A156, and Tillbridge HGVs will utilise the A631. All HGVs will not be using the same route at the same time. The more local roads that make up the construction vehicle routes for Cottam will not be used by the other cumulative schemes.
WLDC-53	Noise and Vibration	Cable construction impacts	As with traffic and highways, a key requirement for WLDC is to exert appropriate control on vehicle movements and construction activity to ensure that the potential cumulative impacts are adequately controlled. Including a co-ordination mechanism on control documents (e.g. CEMP/CTMP) will assist in controlling these impacts and allowing	Impacts of the temporary construction noise and vibration for the construction of the solar panels and associated infrastructure and construction traffic noise has been included and the likely impacts of noise and vibration have been assessed in Section 15.7 of **C6.2.15 ES Chapter 15 Noise and Vibration [APP-050]**. The Applicant will also be implementing measures to control construction traffic as

			communities to carry-out day to day activities	set out in the outline **Construction Traffic Management Plan [REP-016; revised at Deadline 2]**, which is secured by Requirement 15 of **C3.1 Draft Development Consent Order [REP-006; revised at Deadline 2]**.
WLDC-54	Ecology	Cable construction impacts	The Applicant has based the Shared Cable Route Corridor on a construction programme taking 18 months in the Ecology and Biodiversity chapter. This differs from the Gate Burton scheme which accounts for a 24-36 month construction period. This would also circumvent the BNG guidelines which stipulate that 'temporary loss' of habitat is only when this cannot be restored (in full) to baseline condition within 2 years. If the cable route were to take longer than this then it is expected that the BNG calculations should be revisited	If the construction period for the Cable Route Corridor exceeds the 2-year threshold for the temporary habitat loss as stipulated by the BNG guidelines, it would be necessary to revisit the BNG calculations to ensure that the project is in compliance with the guidelines. This could potentially involve identifying any negative impacts on biodiversity and achieve the required net gain.
WLDC-55	Landscape and Visual Impact Assessment	Cumulative Impacts	In terms of cumulative effects, the ES (EN010133-000250-C6.2.8 page 241 onwards) claims 'Beneficial' effects in relation to Contributors to Landscape Character, in relation to 'Nationally and Locally Designated Landscape' and 'Ancient Woodlands and Natural Designations' but does not justify why these effects would be	The applicant notes this comment. With regard to the cumulative effects of the Scheme, **C6.2.8_A ES Chapter 8 Landscape and Visual Impact Assessment Revision A [EN010133/EX2/C6.2.8_A]** (the 'LVIA') assesses the impacts of the Scheme alongside the proposed Gate Burton, West Burton and Tillbridge Solar proposals and

			Beneficial. WLDC strongly content that such impacts cannot be deemed 'beneficial' due to their obvious harm.	shows that beneficial effects will occur on landscape character and visual amenity. The mitigation proposals associated with the landscape and visual receptors for the Scheme are included in **C7.3_A Outline Landscape and Ecological Management Plan [EN010133/EX1/C7.3_A]**, and within 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-305_A to APP-315_A]**. This mitigation takes into account the findings of the cumulative assessment, and therefore the proposed mitigation will deal with the cumulative effects identified. This mitigation is also aimed at benefitting the community as a whole as well as tourists, visiting walkers, local residents, ornithologists and cyclists. The landscape mitigation measures seek to provide new planting, which will include new native hedgerows and tree cover, and this will also include their management and maintenance.
WLDC-56	Landscape and Visual Impact Assessment	Cumulative Impacts	Cumulative effects in the ES appear to have been considered on an incremental basis only; that is the impact of the Cottam Solar Project when added to the cumulative	The Applicant respectfully disagrees. The LVIA has taken into consideration other solar projects at Bumble Bee Farm, Field Farm, Gate Burton, High Marnham,

			projects. There is no assessment of the various combination each cumulative project could have with each other and this is considered to be a significant shortcoming in the ES	Tillbridge and West Burton. With regard to the cumulative effects of the Scheme, **C6.2.8_A ES Chapter 8 Landscape and Visual Impact Assessment Revision A [EN010133/EX2/C6.2.8_A]** (the 'LVIA') assesses the impacts of the Scheme alongside the proposed Gate Burton, West Burton and Tillbridge Solar proposals. This includes an assessment of the various combinations that each cumulative project will have with each other. The effects of the developments cumulatively are shown on **C6.4.8.15.1 Figure 8.15.1 Cottam 1,2 and 3 Cumulative Sites are shown on Cottam Augmented ZTV [APP-290]** and **C6.4.8.15.2 Figure 8.15.2 Cottam 1,2 and 3 Cumulative Developments Augmented ZTV [APP-294]**.
WLDC-57	Landscape and Visual Impact Assessment	Cumulative Impacts	None of the application documents provide an assessment that considers how many solar projects are 'acceptable' in planning terms, or which combination of projects that would be acceptable would be the least damaging/intrusive re landscape character and views. This is a significant shortcoming.	Please refer to the Joint Report on Interrelationships between Nationally Significant Infrastructure Projects **[EX2/C8.1.8_A]** which provides information on the interrelationships between the Gate Burton Energy Park, Cottam Solar Project, West Burton Solar Project and Tillbridge Solar Project. The report has been prepared

				to support the Development Consent Order (DCO) applications for the four projects. Each assessment has been prepared by competent experts.
WLDC-58	Scheme Description	Cumulative Impacts	The application does not provide sufficient detail to explain how multiple projects will be constructed within the shared grid corridor. In order to fully understand the likely impacts on communities, further information is required to understand the likely disruption, the approach to construction or whether the impacts will be multiplied with the risk of site restoration measures being implemented but then destroyed as construction commences on another project.	Within the shared grid connection corridor, the Cottam, West Burton, Gate Burton and Tillbridge projects have worked together to reduce the environmental impacts of the grid connections. Details are provided within the Joint Report on Interrelationships between Nationally Significant Infrastructure Projects [EX2/C8.1.8_A].
WLDC-59	Scheme Description	Cumulative Impacts	WLDC requires the development of a detailed co-ordination plan that is committed to by all developers to control and minimise cumulative impacts	This comment is noted.
WLDC-60	Ecology and Biodiversity	Cumulative Impacts	The cumulative impacts of the project will create the potential for multiple impacts occurring in the shared grid corridor, especially in the event that each project is constructed in sequence. With each NSIP seeking a DCO time period of 5 years, there are no guarantees that construction	The cumulative effects assessment is set out within Section 9.9 of the C6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-044].

			activity within the corridor will be co-ordinated. Each project will have the right and powers to carry out works that will result in direct removal of tress, hedgerows and other natural features.	
WLDC-61	Transport and Access	Cumulative Impacts	The Scheme states that the shared Grid Connection Route utilises different routes from the other solar schemes. This suggests the cumulative impact of the roads will be felt more widely. The cumulative effects chapter is very limited and only considers the routes associated with the construction routes for Cottam.	The Applicant clarifies that within the shared grid connection corridor, the Cottam, West Burton, Gate Burton and Tillbridge projects have worked together to reduce the environmental impacts of each projects' grid connections within the Joint Report on Interrelationships between Nationally Significant Infrastructure Projects [EX2/C8.1.8_A].
WLDC-62	Socio-Economics, Tourism and Recreation	Cumulative Impacts	The broad concerns relating to impacts upon tourism stated above, are equally applicable to all proposed solar projects. On a cumulative basis, these impacts would be multiplied resulting is significant harm to the short, mid and long term tourism sector in the West Lindsey District	The Applicant reiterates that it has assessed cumulative impacts on the tourism and recreation industry for both the Scheme in isolation and cumulatively with other NSIPs in West Lindsey in **C6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-053]**. The assessment has found that there are no significant impacts to the tourism and visitor economy or employment sector at any stage of the proposed Scheme's lifetime. The Applicant has addressed the issue of cumulative

				impacts on tourism in WLDC 9.1 **Local Impact Report document [C8.1.16].**
WLDC-63	Soils and Agriculture	Cumulative Impacts	The impact on agricultural land tenant farmers should also be considered in the wider context of the four proposed solar NSIP's which will occupy a large area of Lincolnshire's land area (1%). There are real concerns as to the displacement of tenant farmers across significant tracts of agricultural land over a 40-60 year period and the seeming expectation that the agricultural industry will simply be able to pick up and recommence in the year 2088 where it left off 60 years earlier. This is not adequately addressed by the application	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]**. Therefore, no direct displacement of tenant farmers is anticipated.
WLDC-64	Soils and Agriculture	Cumulative Impacts	In assessing potential job losses in the agricultural sector it does not consider the wider supply chain that serves the industry. No cumulative assessment has been undertaken of all solar NSIPS upon employment and commercial activity in the agricultural sector	The assessed worst-case loss of 17 FTE agricultural jobs as a result of the Scheme is equivalent to 0.4% of the agricultural employment in the Local Impact Area, as set out in para. 18.7.15 in of **C6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-053]**. Potential for continuation of non-arable agricultural practices on the Scheme, and the ongoing continuation of arable agricultural in the surrounding areas demonstrates that it is unlikely that there will be any more than a low level of impact on agricultural supply

				chains, and therefore are not anticipated to experience significant effects. As a result, these have not been assessed. A cumulative assessment of the direct effect of the cumulative NSIPs on agricultural jobs in the Local Impact Area has been provided at para. 18.10.35, which estimates a worst-case cumulative loss of 41 FTE agricultural jobs during the operational lifetime of the cumulatively assessed projects. This is a long-term minor adverse effect and is therefore not a significant effect. The Applicant has addressed the issue of cumulative employment impacts in WLDC 9.53 and WLDC 21.13 **Local Impact Report document [C8.1.16].**
WLDC-65	Socio-Economics, Tourism and Recreation	Cumulative Impacts	With a growing visitor economy at present, the impact of the cumulative developments could result in the potential loss of employment in the tourism sector as people will not be attracted to the area	The Applicant reiterates that it has assessed impacts on the tourism and recreation industry for both the Scheme in isolation and cumulatively with other NSIPs in West Lindsey in **C6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-053]**. The assessment has found that there are no significant impacts to the tourism and visitor economy or employment sector at any stage of the proposed Scheme's lifetime.

WLDC-66	Landscape and Visual Impact Assessment	Cumulative Impacts	The cumulative impact of all three currently submitted DCO projects (and future NSIPs planned for submission) would result in unacceptable significant adverse harm to the landscape character of West Lindsey to which WLDC objects to in the strongest manner. The geographical coverage of the three project would span approximately over 13 miles from the southern-most point to the northern-most. The landscape would be transformed from a predominantly large scale agricultural character, to one that is characterised by solar electricity generating stations.	The Applicant respectfully disagrees. **C6.2.8_A ES Chapter 8 Landscape and Visual Impact Assessment Revision A [EN010133/EX2/C6.2.8_A]** (the 'LVIA') assesses the impacts of the Scheme alongsIde the proposed Gate Burton, West Burton and Tillbridge Solar proposals. This includes an assessment of the various combination each cumulative project will have with each other. The mitigation proposals associated with the landscape and visual receptors for the Scheme are included in **C7.3_A Outline Landscape and Ecological Management Plan [EN010133/EX1/C7.3_A]**, and within 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-305_A to APP-315_A]**. This mitigation takes into account the findings of the cumulative assessment, and therefore the proposed mitigation will deal with the cumulative effects identified. This mitigation is also aimed at benefitting the community as a whole as well as tourists, visiting walkers, local residents, ornithologists and cyclists. The landscape mitigation measures seek to provide new planting, which will include

				new native hedgerows and tree cover, and this will also include their management and maintenance.
WLDC-67	DCO	Cumulative Impacts	WLDC disputes the applicant's contention that the impacts of the development are temporary and reversable.	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 **[REP-006]** to require the Scheme to be decommissioned after 60 years**C3.1 Draft Development Consent Order [REP-006]**.
WLDC-68	Principle of Development	Cumulative Impacts	WLDC maintain an objection to the project on the basis of cumulative impacts; however, commit to engage with potential solutions suggested in the above sections of this representation. It is essential in WLDC's view, that detailed control mechanisms are developed during the examination phase to ensure that the application is determined with these in place	This comment is noted and the Applicant commits to engage in this process.
WLDC-69	Principle of Development	Cumulative Impacts	WLDC maintain significant concerns regarding the manner in which the DCO examinations into each NSIP are being carried out. The current approach of solely considering the application subject of the	This comment is noted and the Applicant is prepared to engage in a combined hearing session if deemed appropriate by the Examining Authority.

			application without testing the application alongside the various scenarios that could arise as a consequence is flawed. It is essential that the combinations of each cumulative project are understood and assessed	Please also refer to PD-04 in **C8.1.2 The Applicant's Responses to Relevant Representations [REP-049]**
WLDC-70	Draft DCO	Article 46 – Schedule 17	WLDC strongly objects to the Schedule 17 as currently drafted. Schedule 17 has been amended from a 6 week to 8 week time period, however that continues to be considered unreasonably short	Schedule 17 to the draft DCO **[REP-006]** has been updated so that the drafting of the Schedule aligns with the latest drafting of the Gate Burton draft DCO, including in relation to fees and timescales for approvals and consultation. It is the Applicant's intention to keep the draft of the Schedule under review to take account of any further amendments that are made to the Gate Burton DCO. Please see the response to [**WLDC-82**] below.
WLDC-71	Planning Policy Energy Need	Planning Balance	Whilst it is recognised that there is an urgent need for energy generation of all types and this is established through the NPSs and is carried forward into the draft NPS; however, there are elements of the Scheme which require further assessment and justification.	Please refer to ref ENG-03 of **C8.1.2 The Applicant's Responses to Relevant Representations [REP-049].** Paragraph 12.1.3 of **C7.11 Statement of Need [APP-350]** concludes that "Large-scale solar generation is essential to support the urgent decarbonisation of the GB electricity sector" and paragraph 4.4.11 describes that the location of the scheme presents a "highly suitable solution for the efficient

				delivery of solar at scale over timeframe which will provide significant decarbonisation benefits". It concludes that this Scheme and others located near it will all be essential for the decarbonisation of the UK electricity sector. WLDC does not provide details of where further assessment and justification of the Scheme are required in this section of their response, but the Applicant has responded in detail to all the points raised by WLDC in **[REP-089]** and has also responded to the WLDC Local Impact Report in document **[C8.1.16].**
WLDC-72	Planning Policy Energy Need	Planning Balance	Solar electricity generating stations do not benefit from a 'relevant' NPS and as a consequence do not derive benefit of a 'presumption in favou" and nor do they benefit from all of the policy (e.g. the effective overriding of local landscape designations). The balance of the effectiveness of solar proposals given the climate conditions and grid capacity with the loss of prime agricultural farmland that defines the culture, character and	Although NPS EN-1 does not specifically refer to solar development, it is considered important and relevant to the determination of the application, as explained in paragraph 1.3.5 of **C7.5_B Planning Statement [EN010133/EX2/C7.5_B]**. This is because the Scheme is a generating station with a capacity of more than 50MW and the policies in NPS EN-1 are devised specifically for generating stations and energy infrastructure of this scale; and it contains paragraphs that

			economy of West Lindsey must be carefully considered.	emphasise the national need for electricity and electricity infrastructure, including electricity storage.
WLDC-73	Planning Policy	Planning Balance	WLDC consider that the harm caused to its economy, communities and landscape caused by this proposal is unable to mitigated and its impacts irreversible.	The Applicant's ES has clearly set out the limited extent of the residual socio-economics, tourism and recreation, landscape and visual impacts. See ES Chapter Chapter 18: Socio Economics Tourism and Recreation **[APP-053]** and **C6.2.8_A ES Chapter 8 Landscape and Visual Impact Assessment Revision A [EN010133/EX2/C6.2.8_A]**. As described in Section 6 of the Planning Statement **[REP-047],** whilst it has not been possible to avoid all impacts these have been minimised where possible, through careful and sensitive design and detailed mitigation strategies. When considered against the NPS and NPPF, the Scheme accords with relevant policies, and with regard to specific policy tests, the national and local benefits of the Scheme are considered on balance to outweigh its adverse impacts. Paragraph 3.1.2 of NPS EN-1 notes that it will not be possible to develop the necessary amounts of such

				infrastructure without some significant residual adverse impacts.
WLDC-74	Planning Policy Principle of Development	Planning Balance	Due to the design of the project, WLDC object to the project on the basis that the benefits of the project can be delivered with far fewer impacts had a well-designed project, coupled with a rational approach to land assembly, been proposed. WLDC consequently objects to the Cottam Solar Project, finding that the disbenefits clearly outweigh the benefits in accordance with section 105 of the PA2008	The Council suggest at paragraph 5.25 that a single coherent project would be better in terms of design than the chosen application site. However, there is no evidence to prove that a better alternative site could have been found and designed in a better way than the Scheme. A comprehensive five stage Site Selection Assessment **[APP-067]** was undertaken and identified other potential development areas, but none of these scored better than the application site in the RAG assessment that was undertaken (see Section 3 Assessment Results and Annex E: Potential Development Area Proformas). The impacts of an alternative site would be dependent upon the unique location and context of that site and the constraints that arise as a result. It is not therefore reasonable to conclude that a single site would obviously be better or the benefits of the project could be delivered with far fewer impacts. In any event, paragraph 4.4.3 of NPS 1 states that *"where (as in the case of renewables) legislation imposes a specific quantitative target for particular technologies*

				or (as in the case of nuclear) there is reason to suppose that the number of sites suitable for deployment of a technology on the scale and within the period of time envisaged by the relevant NPSs is constrained, the IPC should not reject an application for development on one site simply because fewer adverse impacts would result from developing similar infrastructure on another suitable site, and it should have regard as appropriate to the possibility that all suitable sites for energy infrastructure of the type proposed may be needed for future proposals." As described in Section 6 of the Planning Statement **[REP-047],** whilst it has not been possible to avoid all environmental impacts these have been minimised where possible, through careful and sensitive design and detailed mitigation strategies. When considered against the NPS and NPPF, the Scheme accords with relevant policies, and with regard to specific policy tests, the national and local benefits of the Scheme are considered on balance to outweigh its adverse impacts. Paragraph 3.1.2 of NPS EN-1 notes that it will not be possible to develop the necessary amounts of such

				infrastructure without some significant residual adverse impacts.

West Lindsey District Council (Summary of Oral Submission ISH1) [REP-090]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
WLDC-75	Draft DCO	DCO amendments	WLDC understand that the Applicant is in the process of amending the dDCO in line with amendments made to Gate Burton Energy Park dDCO following ISHs in that examination process. Accordingly, the ExA are requested to note that the below may, and indeed likely will, be subject to amendments in due course	The Applicant directs West Lindsey District Council to the Applicant's response to this topic at Agenda Item 5g of **C8.1.5 Written Summary of the Applicants Oral Submissions and Responses at Issue Specific Hearing 1 [REP-051]**.
WLDC-76	Draft DCO	PARTS 1 TO 6	b) 'Authorised development': WLDC submit that the definition of 'authorised development' should be more precise and clearly defined (see Cleve Hill and Longfield DCOs).	The Applicant directs West Lindsey District Council to the Applicant's response to this topic at Action 1 (pg.24) of **C8.1.5 Written Summary of the Applicants Oral Submissions and Responses at Issue Specific Hearing 1 [REP-051]**.
WLDC-77	Draft DCO	Inconsistencies in the DCO	c) 'Date of decommissioning': WLDC submit that the definition of 'date of decommissioning' and the drafting of requirement 21 are currently inconsistent (not least because requirement 21 does not currently have a notification requirement). Please see comments in respect of requirement 21 below.	The drafting of requirement 21 was updated in the draft DCO submitted at Deadline 1 **[REP-006].**
Please	Draft DCO	Schedule 2	The drafting of requirement 21 was updated in the draft DCO submitted at Deadline 1 **[REP-006]. [REP-006]**	The drafting of requirement 21 was updated in the draft DCO submitted at Deadline 1 **[REP-006]. [REP-006]** to require the Scheme to be decommissioned no later than 60 years following

				the date of final commissioning. The reasons for this approach are set out in the **Written Summary of the Applicants Oral Submissions and Responses at Issue Specific Hearing 1 [REP-051].**
WLDC-79	Draft DCO	Schedule 2	Requirement 5: WLDC submits that Work No 7 should included in requirement 5, as it relates to above ground works that would have a visual impact.	The works contained in Work No 7 are controlled by other requirements. For example: • Work No. 7A(i) relates to fencing which is controlled via Requirement 10; • Work No. 7A(iii) relates to landscaping and biodiversity mitigation and enhancement measures which are controlled via Requirements 7, 8 and 9; • Work No. 7A(viii) relates to drainage systems which is controlled via Requirement 11; and • Work No. 7A(ix) relates to acoustic barriers which is controlled via Requirement 16. The Applicant does not therefore consider it necessary for Work No. 7 to be included in Requirement 5.
WLDC-80	Draft DCO	Schedule 2	Requirement 9: WLDC submits that a minimum requirement should be specified to secure the relevant BNG levels. It is also submitted that	Please see the Applicant's response to ExA Written Question 1.6.15 submitted at Deadline 2.

			requirement 9 is missing a retention clause. WLDC also submit that more details about what must be included in the BNG strategy should be included (see Longfield DCO).	
WLDC-81	Draft DCO	Schedule 2	Requirement 21: WLDC submits that requirement 21 should require the submission of the decommissioning plan 12 months prior to the date of decommissioning. WLDC submits that a temporal 40 year limit should be included in requirement 21. It is also submitted that requirement 21 should contain a notification requirement if the decommissioning is to occur before the 40 years. WLDC considers that requirement 21 requires redrafting.	Please see the Applicant's response to WLDC-78 above.
WLDC-82	Draft DCO	Schedule 17	Procedure for Discharge requirements: WLDC strongly objects to the Schedule 17 as currently drafted. The 6 week approval period currently required by Article 46.2 does not adequately reflect the usual timescale for EIA development which is 16 weeks. It is submitted this time period should apply given some of the requirements include the need to assess complex material, may require the need to procure external expertise to review material, and there may be the requirement for approvals to be determined by WLDC committee(s) therefore requiring the alignment with meeting	The drafting of Schedule 17 has been updated in the **C.3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C]** to provide a 10-week time period for determining applications to discharge Requirements and longer time periods to request further information. The Applicant is also required to submit a copy of the application to any requirement consultee. The Applicant considers its proposed approach to be reasonable and proportionate whilst also ensuring that a nationally significant infrastructure project can be delivered and

			calendars and processes. It is noted that the Longfield DCO allowed a period of 10 weeks, however discharge applications under this DCO are likely to be made concurrently with Gate Burton, West Burton and Tillbridge applications if they are granted consent. It is also noted that there is no mechanism in the dDCO restricting the number of discharge applications that could be simultaneously submitted. In this context a 16 week determination period is entirely reasonable. WLDC consider that a provision should be added allowing agreements for a reasonable extension of time, with such an agreement not being unreasonably withheld, particularly if the relevant determining authority is required to consult other bodies, although WLDC is concerned that the response of consultees (for instance in requirements 11, 15 and 18) are not within the control of WLDC who are subject to the relevant determination period. WLDC note that the ability to agree an extension of time is permitted in Part 1, Article 47 but not Schedule 17. WLDC consider that some requirements may need a longer determination period due to the likely complexity of the information being submitted. WLDC considers that this period will also be influenced by whether a 'deemed	provide much needed renewable energy by 2030.

			consent' provision is retained or removed. The position of WLDC is as follows: Should there be no deemed consent provision, WLDC request that the following timescales be specified: • Requirement 5 = 13 weeks • Other Requirements = 10 weeks Should there a deemed consent provision be retained, WLDC request that the following timescales be specified: • Requirement 5 = 16 weeks • Other Requirements 13 weeks WLDC object to the deemed approval provision. The justification relied on the by the Appellant is one of efficiency (Explanatory Memorandum at 5.17.2) do not cite any unique or specific reason why such a provision should be included. This is especially relevant when other DCOs, including those cited in the Explanatory Memorandum itself, do not provide for deemed approval or only do so in relation to certain requirements, rather than all of them. Indeed, the Applicant describes the Schedule 16 process as 'bespoke' (Explanatory Memorandum at 5.17.2). Given the importance and significance of the substantive areas governed by the requirements WLDC submits that it is unacceptable for any of the requirements to be subject to deemed approval. WLDC object to the requirement under Article 46.3.(2) that further information must be requested in 10 working days. The relevant	

			determining authority will need to sufficiently assess the information in able to identify whether further information is required. This essentially requires that the WLDC all but procedurally determine the application in 10 working days. Similarly, WLDC object to the time periods in 3.(3), in particular, it is unreasonable to require the relevant determining authority to request further information within 15 working days where they have consultation requirements, as the response period of such consultees is not within their control. WLDC submit that the usual fee provision (see the Longfield DCO and Advice Note 15), which has been excluded without any justification given by the Appellant, is reinstated in Schedule 17.	

Brampton Village Parish Meeting [REP-131]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
BVPM-01	Principle of development	Cumulative Effects	Our village is vehemently opposed to the solar farms planned for this corner of Lincolnshire. The proposed projects will occupy something in the region of 5% of the area of West Lindsey - a density high is frankly untenable.	Please refer to response PD-04 in **C8.1.2 The Applicant's Responses to Relevant Representations [REP-049]**.
BVPM-02	Soils and Agriculture	Food security	As a small, densely populated country, we desperately need good, productive farm land. Couple land loss with disastrous decisions regarding trade with Europe and the Brexit penalty, we can I'll afford to lose good land, particularly when there are other options.	Please refer to response FPM-19 in **C8.1.2 The Applicant's Responses to Relevant Representations [REP-049]**.
BVPM-03	Ecology	Loss of biodiversity	We sit at the bottom of the European league table for loss of wildlife. England's green and pleasant land is shrinking, causing reduction in diversity, leaving an increasingly desolate, barren land.	Please refer to response ECO04 in **C8.1.2 The Applicant's Responses to Relevant Representations [REP-049]**.
BVPM-04	Energy Need	Carbon footprint	The need to reduce our carbon footprint is clear; the need to reduce our carbon output is equally clear; the need for mass solar panels is not. It is merely expedient. We happen to have old power stations close by, with existing grid connections. Hence, it's a cheap solution that impacts on a few country folk - who really cares!	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. Paragraph 12.1.3 of **C7.11 Statement of Need [APP-350]** concludes that "Large-scale solar generation is essential to support the urgent decarbonisation of the GB electricity sector" and paragraph 4.4.11 describes that the location of the scheme presents a "highly suitable solution for the efficient delivery of solar at scale over timeframe which will provide significant decarbonisation benefits". It concludes that this Scheme and others located near it will all be essential for the decarbonisation of the UK electricity sector.

Fillingham Parish Meeting – Summary of Oral Submissions ISH1 [REP-153]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
FPM-01	Energy Need	Need for decarbonisation	During the ISH on DCO, the Applicant described the Urgent Need to decarbonise. The Climate Change Act came into force in 2008, placing a legal responsibility on the Government to stick to binding CO2 reductions – reflecting the urgent need to decarbonise. Decarbonisation has been an urgent issue for at least 15 years now	Chapter 4 of **C7.11 Statement of Need [APP-350]** sets out the UK's legal requirement to decarbonise and explains how that requirement has created an increased need and urgency to meet the UK's obligations under the Paris Agreement (2015) as detailed within paragraph 4.2.7. The Chapter summarises the latest expert views on the urgency for, and depth of, low-carbon infrastructure needed to deliver the UK's Net Zero legal obligations, and demonstrates that there is an urgent need for the development of large-scale solar schemes. **Section 3.3** of **C7.11 Statement of Need [APP-350]** summarises the 2021 Draft Revised National Policy Statement EN-3, which sets out Government's view that a Net-Zero consistent [energy] system in 2050 is likely to be composed predominantly of wind and solar. This point is reiterated in the newly published March 2023 Draft Revised National Policy Statement EN-3. **Figure 7.1** shows National Grid Electricity System Operator's projections of the capacity of solar generation required to deliver a net-zero consistent system, which, as stated in para. 7.2.10, are 25 – 42GW by 2030, and 57 – 92GW by 2050, compared to just 14GW today (**Section 7.2**).

FPM-02	Energy Need	Roof top solar	Over this time, even without retro-fitting any rooftops, new build domestic rooftops alone could have delivered 6000MW of solar, or around 12 similar sized NSIP schemes to Cottom (based on 100,000 houses / year, with 4kW installations) The Skidmore review calls for a Rooftop Solar Revolution. And yet, thousands of rooftops continue to be built, every year, without solar.	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 to meet the urgent national need for low-carbon electricity generation. 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 for a scheme of this size. The methodology used for the site selection process is considered reasonable and proportionate and complies with the requirements of paragraph 4.4.3 in the currently adopted NPS EN-1.
FPM-03	Energy Need	Role of solar energy in grid decarbonisation	There is a need to provide solar power to decarbonise, but it was only last year, in 2022, the UK Government identified an ambition for 70GW of solar – the first time any figure has been stated	**Section 3.3** of **C7.11 Statement of Need [APP-350]** summarises the 2021 Draft Revised National Policy Statement EN-3, which sets out Government's view that a Net-Zero consistent [energy] system in 2050 is likely to be composed predominantly of wind and solar. This point is reiterated in the newly published March 2023 Draft Revised National Policy Statement EN-3. **Figure 7.1** and related text explains that National Grid's future pathways to net zero have included increasing capacities of solar generation each year. National Grid's projections of the capacity of solar generation required to deliver a net-zero consistent system, which, as stated in para. 7.2.10, are 25 – 42GW by 2030, and 57 – 92GW by 2050, compared to just 14GW today (**Section 7.2**). Section 10.2 **of C7.11 Statement of Need [APP-350]** describes how the UK electricity market functions, and how solar power reduces

				the wholesale cost of power. Section 8.9 of **C7.11 Statement of Need [APP-350]** summarises The Government's view that the deployment of large capacities of UK-based renewables – including up to 70GW by 2035 – is essential to reduce UK consumer exposure to volatile global wholesale energy prices
FPM-04	Energy Need	Role of solar energy in grid decarbonisation	It is vital we make the right decisions regarding how we decarbonise and how we manage competing land uses. We cannot commit significant areas of land to solar panels which can make very limited energy or decarbonisation contributions in the UK – and regret using land in this way, when it may be better used for direct decarbonisation measures, or other pressing needs where there is no alternative	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 7.6.8 of **C7.11 Statement of Need [APP-350]** states that: "Draft NPS EN-3 includes an anticipated range of 2 to 4 acres for each MW of output generally required for a solar farm along with its associated infrastructure." The Scheme as proposed delivers a large-scale solar generation asset which is consistent with this range, as is described through paragraphs 4.2.1 to 4.2.3 of **C6.2.4 ES Chapter 4_Scheme Description [APP-039]**. 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.
FPM-05	Energy Need	Role of solar energy in grid decarbonisation	The Applicant describes the need to act urgently, but it is worth considering that perhaps their urgency is driven more by there being 130,000MW of other solar developments in National Grid's capacity pipeline, excluding the 16,000MW currently installed, or any potential future rooftop solar installation. Understandably, with an ambition for only 70,000MW of solar, the race is on for developers to get quick decisions and bank their schemes.	Chapter 4 of **C7.11 Statement of Need [APP-350]** sets out the UK's legal requirement to decarbonise, and explains how that requirement has created an increased need and urgency to meet the UK's obligations under the Paris Agreement (2015) as detailed within para. 4.2.7. The Chapter summarises the latest expert views on the urgency for, and depth of, low-carbon infrastructure needed to deliver the UK's Net Zero legal obligations, and demonstrates that there is an urgent need for the development of large-scale solar schemes. **Section 3.3** of **C7.11 Statement of Need [APP-350]** summarises the 2021 Draft Revised National Policy Statement EN-3, which sets out Government's view that a Net-Zero consistent

				[energy] system in 2050 is likely to be composed predominantly of wind and solar. This point is reiterated in the newly published March 2023 Draft Revised National Policy Statement EN-3. **Figure 7.1** shows National Grid Electricity System Operator's projections of the capacity of solar generation required to deliver a net-zero consistent system, which, as stated in para. 7.2.10, are 25 – 42GW by 2030, and 57 – 92GW by 2050, compared to just 14GW today (**Section 7.2**). Paragraph 7.4.11 **of C7.11 Statement of Need [APP-350]** states that "The inclusion of a project on a 'future project pipeline' – for example, a list of projects which have applied for a DCO, or the scoping / consents / construction pipeline … does not indicate that the project will go ahead, or if it does, at a particular generation capacity."

Broxholme Parish Meeting [REP-204]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
BxPM-01	General	Consultation and examination process	Concern regarding the crowding of consultations for four massive solar schemes, the unreality of trying to consider these separately and of the Inspector trying to address this under cumulative effects. It is clear that running all these proposals in tandem is a ploy by the developers to disadvantage the lay resident affected by these proposals.	The Applicant acknowledges this comment and is confident that the level of consultation undertaken and information presented throughout the pre-application stage is in accordance with the Planning Act 2008 and associated guidance. This has been evidenced in **5.1 Consultation Report [APP-021]**, which was submitted to the Planning Inspectorate and accepted for examination. As described in Chapter 2 of **5.1 Consultation Report [APP-021],** the Applicant undertook two phases of community consultation to share information and invite feedback at different stages of Scheme development. Chapter 7 of **5.1 Consultation Report [APP-021]** describes the Applicant's approach to statutory consultation, including consulting with relevant authorities on a draft Statement of Community Consultation. The Applicant notes that it has engaged with the developer of Gate Burton Energy Park (Low Carbon) to manage consultation activities to reduce the risks of consultation fatigue and confusion for communities. This included

				avoiding any overlap when arranging public information events and presenting a graphic which showed the locations of the Scheme, West Burton Solar Project, and Gate Burton Energy Park. Table 7.1 **[APP-021]** 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 **5.1 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 channels open to help aid accessibility and understanding of the Scheme. 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 **5.7 Appendix 5.7: Phase Two Community Consultation Materials [APP-028]**. Chapter 11 of **5.1 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 is further evidenced by **5.10 Appendix 5.10: Consultation Report Appendix – Section 47 Applicant Response [APP-033]**. Chapter 12 of **5.1 Consultation Report [APP-021]** describes the significant volume of responses received to the Section 42 consultation (statutory stakeholders), including the issues raised and how these were considered by the Applicant. This is further evidenced by **5.11 Appendix 5.11: Consultation Report Appendix – Section 42 Applicant Response [APP-034].** The Applicant notes that 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.

2.2 The Applicant's Responses to Other Statutory Consultees, International Agencies, Undertakers, Elected Representatives, Community Organisations and those whose Interests would be affected by the Order

EDF Energy (Thermal Generation) Limited [REP-092]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
EDF-01	Principle of Development	Recognition of Scheme benefits	1.3 EDF does not object in principle to the Proposed Development. EDF recognises the potential benefits of the Proposed Development for the local and national energy supply and supports the principle of co-locating renewable and low-carbon energy generation facilities where possible.	The Applicant notes this comment.
EDF-02	Principle of Development	Proximity to assets	1.4 EDF does, however, object to: 1.4.1 the Proposed Development being carried out in close proximity to its (and third-party owned) assets unless and until suitable protective provisions and/or related agreements have been secured to its satisfaction (discussed further at section 4 below); and	The Applicant notes this comment and notes that discussions are ongoing with EDF to develop protective provisions to be included within the DCO [**EX2/C3.1_C**] that will protect the Party's existing rights and infrastructure.
EDF-03	Draft DCO	Compulsory Acquisition	1.4.2 any compulsory acquisition powers for land, rights or other related powers being involved which would affects its interests and apparatus (and third-party owned assets). This is unless and until suitable protective provisions and/or related agreements have been secured to its satisfaction.	Please see the response to paragraphs 1.4-1.4.1 (EDF-02) above.

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
EDF-04	Draft DCO	Protective provisions	2.3 EDF will require appropriate protection to ensure that the Proposed Development does not jeopardise continuing operations or site demolition. EDF's rights of access to inspect, maintain, renew and repair infrastructure must also be maintained at all times and access to inspect and maintain such apparatus must not be restricted.	Please see the response to paragraphs 1.4-1.4.1 (EDF-02) above.
EDF-05	Draft DCO	Existing obligations	2.5 EDF understand that discussions are ongoing between the Promoter and other third parties (including Uniper) in respect of the protection of this live infrastructure. However, EDF must also ensure that it can comply with obligations it has to these third parties. Any infrastructure or operations associated with the Proposed Development must protect this third-party infrastructure and be undertaken in full compliance with the terms of the existing legal agreements and obligations entered into by EDF.	The Applicant confirms that they are committed to consultation and agreement with operators and/or owners of utility infrastructure that is likely to be directly impacted by the location or design of the Scheme to ensure no adverse impacts to the continued operation of the relevant utility. Protective provisions for the protection of various named statutory undertakers, as well as general protective provisions, are included in Schedule 16 to the draft DCO [**EX2/C3.1_C**], and the Applicant is in discussions with various third parties to agree the final form of these protective provisions. Meetings have taken place with Uniper to discuss how the proposed cable route can be chosen to minimise the impacts upon their infrastructure. Additional technical work continues but an

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				agreement on the best route into Cottam Power Station to minimise impacts has been reached.
EDF-06	Draft DCO	Existing obligations	2.6 A site separation agreement has been finalised with Uniper. Site separation discussions are ongoing with National Grid and are expected to be progressed by the end of 2023. Any infrastructure or operations associated with the Proposed Development must not negatively impact or hinder these site separation discussions.	Discussions with Uniper and EDF regarding the cable route and construction traffic access routes have proved valuable in order to shape construction proposals such that impacts upon either entity are minimised. The Applicant maintains a good working relationship with National Grid and it is not believed that discussions regarding the connection of the Scheme to the National Grid substation would negatively impact upon EDF's site separation discussions with them.
EDF-07	Scheme Description	Assurance against impacts on future development of Cottam Power Station site	3.3 EDF wish to ensure that the regeneration of the Station and the wider area is facilitated in line with the Council's requirements and ambitions. It is therefore imperative that the proposed cable route of the Proposed Development does not sterilise development land or detract from future development plans. 3.4 To ensure that the proposed cable route of the Proposed Development does not impact on future development at the Station, EDF considers that a requirement should be imposed within the draft Development Consent Order ("dDCO")	Discussions with EDF regarding the cable route and construction traffic access routes have proved valuable in order to shape construction proposals such that there are not anticipated to be adverse impacts upon EDF's undertaking or future proposals in proximity to the Scheme. The Applicant considers that the most appropriate mechanism for ensuring that the location of the cable route within EDF's land does not cause any detriment to its statutory undertaking is via the protective provisions and not a requirement.

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			requiring the subsequent approval of the final cable routing by Bassetlaw District Council with EDF as a named consultee in respect of such an approval.	
EDF-08	Draft DCO	Protective provisions	4.1 EDF considers it necessary for the protection and continued safe operation and future demolition of the Station that protective provisions be included within the dDCO. It is EDF's position that protective provisions are necessary and reasonable to avoid an adverse impact on and serious detriment to EDF's existing (and future) operations and to ensure that the Station can be safely demolished. 4.2 EDF are engaging with the Promoter as to the content and form of the proposed protective provisions, and, as such, the dDCO does not yet contain agreed protective provisions for the protection of EDF to EDF's satisfaction. 4.3 EDF will continue to engage with the Promoter on protective provisions. Should it not be possible to reach agreement with the Promoter, EDF reserves the right to attend a Compulsory Acquisition Hearing or Issue Specific Hearing to address the required format of the	The Applicant notes these comments and notes that discussions are ongoing with EDF to develop protective provisions to be included within the DCO [**EX2/C3.1_C**] that will protect the Party's existing rights and infrastructure.

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			protective provisions and any necessary amendments to the dDCO. 4.4 EDF reserves the right to provide the Examining Authority with further written information in relation to any detailed issues remaining in dispute (regardless of whether noted in this submission) between EDF and the Promoter at subsequent Deadlines.	

The Environment Agency [REP-093] [REP-094]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
EA-01	Ecology and Biodiversity	EMF impacts	Suggests that a risk assessment be carried out on the potential impact from the presence of electromagnetic fields (EMF) on ecology, in particular migratory fish, where the grid connection corridor proposes to go underneath the River Trent.	It is noted that 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 or ecology, demonstrated by EMF impacts being 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]**).
EA-02	Draft DCO	Disapplication of regulations	Request that Article 6(1)(h) of the dDCO be amended so that Regulation 12 of The Environmental Permitting (England and Wales) Regulations 2016 not be disapplied in its entirety. The disapplication of The Environmental Permitting (England and Wales) Regulations 2016 for flood risk activities will be subject to agreement regarding protective provisions.	The words 'in respect of a flood risk activity only' have been added to Article 6(1)(h) of **C3.1_B Draft Development Consent Order Revision B [REP-006]** submitted at Deadline 1.
EA-03	Draft DCO	EA status as consultee	Request that the Environment Agency be a named as a consultee for dDCO Schedule 2, Requirements 7 (1), 8, 13, 14(1) and 21 (1-4).	The Environment Agency has been added as a consultee in relation to Requirements 7, 8, 13, 14 and 21 of Schedule 2 of **C3.1_B Draft Development Consent Order Revision B [REP-006]** submitted at Deadline 1.

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
EA-04	Draft DCO	Consultation period on requirements	Request that the procedure outlined in Schedule 17, Paragraph 3(3) of the dDCO should allow 20 working days for consultation on requirements.	Schedule 17 of **C3.1_B Draft Development Consent Order Revision B [REP-006]** submitted at Deadline 1 has been updated so that the drafting of the Schedule aligns with the latest drafting of the Gate Burton draft DCO, including in relation to fees and timescales for approvals and consultation.
EA-05	Draft DCO	Consultation period on representations	Request that the procedure outlined in Schedule 17, Paragraph 4(2)(c) of the dDCO should allow 20 working days for the submission of representations.	Paragraph 4(2)(c) has not been amended in the dDCO as it is important for any appeals to be dealt with promptly. This aligns with the timescales proposed in the Gate Burton dDCO.

Historic England [REP-095]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
HE-01	Cultural Heritage	Thorpe mediaeval village SM	The representation consists of the Historic England list entry for Thorpe medieval settlement Scheduled Monument, List Entry 1016978, and an extract from 1st edition Ordnance Survey 1:2500 mapping 1886, showing a former field boundary referred to in another (unreferenced) written representation.	The Applicant notes the location of the east-west field boundary to the north of the Thorpe in the Fallows Scheduled Monument (1016978), as depicted on the 1886 OS map. The Applicant considers that the field boundary respects the post-medieval landscape, the character of which is considered to be distinctly separate to the former medieval village and its immediate hinterland. The Applicant refers to the latest version of its Statement of Common Ground with Historic England, submitted at Deadline 2 [**REP-065**].

National Grid Electricity Transmission plc [REP-096] [REP-097]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
NGET-01	Draft DCO	Protective provisions	Requires protective provisions to be included within the DCO to ensure that its interests are adequately protected and to ensure compliance with relevant safety standards	The Applicant has included protective provisions for the protection of National Grid in Part 3 of Schedule 16 to the **C3.1_B Draft Development Consent Order Revision B [REP-006]** to ensure that its statutory undertaking is not subject to serious detriment as a result of the Scheme. The Applicant is confident that agreement on the protective provisions can be reached with National Grid prior to the end of the Examination.

Natural England [REP-098]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
NE-01	Soils and Agriculture	Scope of assessment	The omission of assessment of the impact of all elements of the development on soils and Best & Most Versatile land	The Applicant provided further information in the draft **SoCG with Natural England C8.3.11 [REP-072]**, which Natural England is currently considering. The Applicant is confident that agreement can be reached with Natural England prior to the end of the Examination.
NE-02	Scheme Description	Decommissioning and restoration	Restoration of the site following decommissioning	The applicant provided further information in the draft **SoCG with Natural England C8.3.11 [REP-072]**, which Natural England is currently considering. The Applicant is confident that agreement can be reached with Natural England prior to the end of the Examination.

Network Rail Infrastructure Limited [REP-099]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
NRIL-01	Draft DCO	Objection to use of CA powers on Network Rail land	Further to Network Rail Infrastructure Limited's (Network Rail) relevant representation submitted on 24 March 2023 (Relevant Representation), Network Rail wishes to make this written representation in relation to Cottam Solar Project Limited's (Promoter) application (Application) for the above development consent order (DCO). The Application includes provisions which would, if granted, authorise the Promoter to carry out works on and in close proximity to operational railway land in the control of Network Rail, to use such land temporarily and to acquire permanent interests in such land. As set out in the Network Rail's Relevant Representation, the Book of Reference identifies the following 3 plots of land as land owned by Network Rail in respect of which compulsory acquisition powers are sought. The plots are as follows: • 02-042; • 16-320; and • 18-372	The Applicant has been negotiating protective provisions with Network Rail ensure that its statutory undertaking is not subject to serious detriment as a result of the Scheme, as set out in **C8.1.13A Schedule of Progress regarding Protective Provisions and Statutory Undertakers [submitted at Deadline 2]**. Draft protective provisions are included in Part 10 to Schedule 16 of the **C3.1_B Draft Development Consent Order Revision B [REP-006]**), and these contain protections relating to "railway property". The Applicant is in the process of negotiation the necessary property rights required for the Scheme on Network Rail's land. The Applicant is confident that agreement can be reached with Network Rail prior to the close of the Examination.

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			(together the Plots). The Applicant is seeking, through compulsory purchase (Compulsory Powers), the permanent acquisition of rights and temporary use of land over all Plots. Network Rail objects to the use of Compulsory Powers and temporary powers over the Plots to deliver the development to be authorised by the DCO. Network Rail continues to investigate the extent of the risks to its assets and is liaising with the Promoter in relation to any mitigation required and it is anticipated that this will continue during the examination process. In order for Network Rail to be in a position to withdraw its objection to the making of the DCO, it will require the following matters to be concluded and secured to its satisfaction: 1. Network Rail requires its standard protective provisions to be included within the DCO to ensure that its interests are adequately protected and to ensure compliance with the relevant safety standards. As at the date of these Written Representations no progress has been made between the parties on the form of protective	

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			provisions to be included in the DCO and Network Rail still awaits the Promoter's comments on Network Rail's standard protective provisions, which were issued to the Promoter on 24 March 2023. 2. Network Rail requires the completion of a framework agreement to regulate the manner in which rights over railway property are to be granted and in which works are to be carried out in order to safeguard Network Rail's statutory undertaking. Engineers for Network Rail are continuing to review the extent of impacts on operational railway and Network Rail's property and any mitigation required (including Network Rail's review and prior approval of the design proposals for the parts of the DCO scheme which interface with the railway at detailed design and construction stages) will be considered in this agreement. Draft framework agreement was issued to the Promoter on 24 March 2023 and at the date of these Written Representations the Promoter's comments are outstanding. Network Rail and the Promoter are in discussions about the effects of the DCO in general and will continue to liaise to address all outstanding matters.	

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			Until satisfactory agreement has been reached with the Promoter on all matters to Network Rail's satisfaction, Network Rail will not be in a position to withdraw its objection to the making of the DCO. Network Rail reserves the right to be heard at an appropriate hearing to explain in detail the impacts of the scheme on its operations. Network Rail will, of course, respond to any Written Questions that the Examining Authority wishes to ask	

Water Management Consortium / Trent Valley Internal Drainage Board [REP-100] [REP-102]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
WMC-01	Hydrology, Flood Risk and Drainage	Historic flood events	Early investigations have identified two areas of concern where historic flooding has occurred. These are Toft Dyke at Clayworth and Cuckstool Dyke, East of Ossington at Sutton on Trent. Further investigations on these watercourses should be considered as a part of the development process.	The flood risk from all sources has been assessed throughout the **C6.3.10.1 ES Appendix 10.1 Flood Risk Assessment and Drainage Strategy Report [APP-090]**. Neither Toft Dyke at Clayworth and Cuckstool Dyke East of Ossington at Sutton on Trent are within proximity of the scheme and therefore are not considered within the assessments.
WMC-02	Hydrology, Flood Risk and Drainage Draft DCO	Offsets to IDB watercourses	No building or structure (arrays, compounds and transformer stations) shall be erected within 9 metres of the top of the bank of a watercourse.	As set out within the **Statement of Common Ground with Upper Witham Internal Drainage Board [REP-068]** the Applicant has discussed this matter with the IDB and both parties are in agreement that the scale of the Scheme makes it impossible to provide the full information regarding detailed design at this stage. The Upper Witham IDB requirement of a 9m (from the bank top) clear strip adjacent to all the maintained watercourses is not fully defined on the current drawings. However, the Applicant can confirm that distances between IDB watercourses and drains and all Scheme infrastructure will be offset at a distance of at least 9m from the bank top. Detailed drawings showing the required offsets will be provided to the IDB at the detailed design stage post DCO consent.

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				Protective provisions for the benefit of the Trent Valley IDB are included in Part 8 to Schedule 16 to **C3.1_B Draft Development Consent Order Revision B [REP-006]**. These require that the IDB be consulted and approve any "specified works" being any work in, on, under, over or within 9m of any of the IDB's drains or watercourses.
WMC-03	Draft DCO	Protective provisions	Along the cable route ALL Board watercourses are to be crossed by HDD. The minimum depth of cover from hard bed level is 1.5m. However, from experience this would generally be closer to 3m for this type of crossing. This requirement should be covered by Protective Provisions within the DCO. This matter should be discussed further and in more detail as the proposed cable route is refined.	Protective provisions for the benefit of the Trent Valley IDB are included in Part 8 to Schedule 16 to **C3.1_B Draft Development Consent Order Revision B [REP-006]**. These require that the IDB be consulted and approve any "specified works" being any work in, on, under, over or within 9m of any of the IDB's drains or watercourses.
WMC-04	Draft DCO	Protective provisions	Any culverting or other works within the bed of any riparian watercourse within the Boards district be they temporary or permanent will also require consent.	Protective provisions for the benefit of the Trent Valley IDB are included in part 8 to Schedule 16 of **C3.1_B Draft Development Consent Order Revision B [REP-006]**. These require that the IDB be consulted and approve any "specified works" being any work in, on, under, over or within 9m of any of the IDB's drains or watercourses.

Uniper [REP-101]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
UNI-01	Draft DCO	Protective provisions	Uniper, owner of Cottam Development Centre (an operational gas fired power station) are currently in the process of discussing access rights with all four of applicants for the proposed solar projects. Uniper has reservations and concerns regarding the close proximity of the solar developments to our operational assets and as such the DCOs should not be granted until our negotiations have progressed to a satisfactory conclusion.	The Applicant has been discussing access rights and cable route crossing methodologies with Uniper as set out in **C8.1.13A Schedule of Progress regarding Protective Provisions and Statutory Undertakers [submitted at Deadline 2]**. The Applicant is confident that agreement can be reached with Uniper prior to the close of the Examination.

Canal & River Trust [REP-134] [REP-135]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
CRT-01	Scheme Description	Cable route detail design	<u>Detailed design in respect of cable under the River Trent</u> During the discussion of requirement 5 (detailed design approval), the Trust made the ExA aware that the Applicant had committed to drilling at least 5m below the lowest surveyed part of the riverbed. The Trust confirmed that the Applicant has not yet set out how this commitment would be secured. By way of example, the Gate Burton Solar NSIP applicant has committed to the same principle and are securing this by way of the detailed design approval requirement and the project's Outline Design Principles document. The Trust recognises that the Applicant may have reason to deal with this differently. If it seeks to secure the drilling depth by way of requirement 5, that requirement will need to apply to Work No. 6B, which is the work package including the cable under the River Trent	The design parameters and principles for Work No. 6 in connection with electrical cabling contained in **C7.15 A Concept Design Parameters and Principles Revision A [REP-039]** have been updated to state, 'Minimum drilling, boring depth under the River Trent to be 5 metres'. Requirement 5 of Schedule 2 of **C3.1_B Draft Development Consent Order Revision B [REP-006]** states that Work No. 6 must be carried out in accordance with the **C7.15 A Concept Design Parameters and Principles Revision A [REP-039]**.
CRT-02	Draft DCO	Protective provisions	<u>Protective Provisions</u> The Trust concurred with the Applicant that the protective provisions for the Trust had been agreed between the parties and would be included in the next revision of the draft DCO.	Specific protective provisions for the benefit of the Canal & River Trust are included in Part 13 to Schedule 16 of **C3.1_B Draft Development Consent Order Revision B [REP-006]**. These

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			The draft DCO does not contain any specific protective provisions for the Trust. The Trust notes that other statutory undertakers have been afforded protective provisions within schedule 16. Following the acceptance of the Application for examination, we have asked the applicant if they would be willing to include protective provisions for the Trust. To aid the examination we have prepared a set of protective provisions which would resolve and satisfy our principal concerns. The protective provisions have been adapted from the Keadby 3 (Carbon Capture Equipped Gas Fired Generating Station) Order 2022 (made 7 December 2022). A copy of these is appended to this letter. The Trust reserves the ability to add to and amend the draft protective provisions as part of the examination process.	provisions have been agreed with the Canal & River Trust.
CRT-03	Draft DCO	Code of practice	Any parts of the Project with the potential to affect the River Trent should be carried out in accordance with the Canal & River Trust Third-Party Works Code of Practice (CoP). DCOs for these NSIPs have included an express obligation obliging the applicant to have regard to the CoP in the detailed survey, design, construction, and approval of the relevant works	Part 13 to Schedule 16 of **C3.1_B Draft Development Consent Order Revision B [REP-006]** contains an express obligation that works be carried out in accordance with the Canal & River Trust's Code of Practice.

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
CRT-04	Draft DCO	Disapplication of regulations	Disapplication of legislation listed in Schedule 3 of the dDCO The Trust made the ExA aware that the Trent (Burton-upon-Trent and Humber) Navigation Act 1887, listed at 1(e) of Schedule 3 of the dDCO contained powers to dredge the River Trent at the location that the Applicant proposes the grid connection cable will cross under the river. The Trust confirmed the Applicant agrees the principle that the project does not need to prevent dredging of the river and has no intention to preclude those powers. The Applicant had previously confirmed it would amend the wording of article 6(1)(i) dDCO.	Revision B of **C3.1 Draft Development Consent Order [REP-006]** includes the amendment at article 6(1)(i). Please refer to **[REP-007]** showing the amendment in tracked changes.

Dee Hardman [REP-145]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
DH-01	Soils and Agriculture	Food security	You can not eat electricity. Solar panels should never be put on agricultural land. These fields are essential for growing crops, food and animal feed. If the proposal of 72.000 acres of solar panels in Lincolnshire alone is true, then the country will starve.	The Applicant does not consider that the Scheme is a threat to UK food security. Please refer to **C8.1.2 The Applicant's Responses to Relevant Representations [REP-049]** for the Applicant's responses to similar comments raised, for example at BLPC-03 and FPM-19.

Edward Leigh MP [REP-151] [REP-156]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
ELMP-01	Soils and Agriculture	Use of agricultural land and food security	I have stated time and again my opposition to taking good land out of productive agricultural use, especially at a time when global food distribution networks continue to be threatened and undermined by the Russian invasion of Ukraine. Furthermore, ministers have reassured me that the National Planning Policy Framework continues to uphold the presumption against these kinds of projects being built on agricultural land graded 1, 2, or 3a. In fact, land graded 3b is just as good for growing wheat and grain and I have encouraged the existing protections to be extended to 3b land. If approved, this project would undermine the food security of our country and the world, as well as threatening the agricultural community of Lincolnshire. Such an approval would ride roughshod over the sensible and reasonable views of local residents.	The Applicant does not consider that the Scheme is a threat to UK food security. Please refer to **C8.1.2 The Applicant's Responses to Relevant Representations [REP-049]** for the Applicant's responses to similar comments raised, for example at BLPC-03 and FPM-19.
ELMP-02	General DCO Process	Consideration of cumulative developments together	This proposal is part of a series of proposals for solar projects that should be considered all together, rather than being heard individually. The impact this proposal would have in	Please refer to the Joint Report on Interrelationships between Nationally Significant Infrastructure Projects **[EX2/C8.1.8_A]** which provides information on the interrelationships

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			conjunction with the others if approved would result in an entirely unwelcome level of grotesque overdevelopment which would swamp Gainsborough and its surrounding areas which would total up to 10,000 acres. In my view if these applications are not considered all together than the total acreage of these proposals should be much reduced. The fact that these proposals are not being taken together means that the Planning Inspectorate considering them will not be able to understand the cumulative impact of these proposals	between the Gate Burton Energy Park, Cottam Solar Project, West Burton Solar Project and Tillbridge Solar Project. The report has been prepared to support the Development Consent Order (DCO) applications for the four projects. Each assessment has been prepared by competent experts.
ELMP-03	Scheme Description	Community benefits	It is also totally unclear that the applicants have made any attempt to provide community gain in the hope of alleviate the very obvious demerits of their proposals. This total lack of engagement with the local community is thoroughly deplorable and provides further grounds for objection.	The Applicant is committed to providing a Community Benefit Fund – see paragraph 4.8.1 of **C7.5_B Planning Statement Revision B [EN010133/EX2/C7.5_B]**. This fund will be available for community-based benefits throughout the lifetime of the Scheme. The provision of the Community Benefit Fund itself does not form a part of the DCO Application, and therefore will be agreed separately between the Applicant and the fund's beneficiaries.

Kate Skelton [REP-170]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
KS-01	Human health	Impact on amenity and wellbeing	Our life choice was to move to the countryside, build a home and raise a family. We have invested every penny into this place, and forsaken many mainstream luxuries to pursue this lifestyle. Our lives would be turned upside down by this vast solar proposal. It would undoubtably become a depressing and disfigured area to live in. Surely the human cost comes into this, and 40 years is not temporary.	The Applicant notes this comment, and directs Mrs Skelton to the Applicant's previous response to this topic at response "STR-11" in **C8.1.2 The Applicant's Responses to Relevant Representation [REP-049]**.
KS-02	Socio-economics, Tourism and Recreation	Personal Effect from the Scheme	If this giant solar proposal were to go ahead, then the applicant and the landowner would stand to make vast fortunes, whereas we would lose everything. The landscape around us would become ugly and industrialised, our future income stream would be pointless to pursue because of this, with our property significantly devalued.	The Applicant notes this comment, and directs Mrs Skelton to the Applicant's previous response to this topic at response "STR-11" in **C8.1.2 The Applicant's Responses to Relevant Representation [REP-049]**.
KS-03	Scheme Description	Size of solar infrastructure	We would be completely surrounded by the huge and fragmented Cottam 1 proposal. We would be overwhelmed by 4.5 metre high structures of glass and steel in all directions with all our views utterly dominated by miles of highly obtrusive infrastructure and the mass industrialisation of	The Applicant notes this comment, and directs Mrs Skelton to the Applicant's previous response to this topic at response "LAN-04" in **C8.1.2 The Applicant's Responses to Relevant Representation [REP-049]**.

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			our countryside is undeniably wrong and unnecessary.	
KS-04	General	Consultation	The consultation process now appears to have been a tick box exercise and not taken seriously. Virtually all agreements previously made between IGP and ourselves have now been ignored. We are extremely disturbed by IGP's unsympathetic approach and unwillingness to reduce the significant and permanent affliction imposed on our lives.	The Applicant is confident that the level of consultation undertaken and information presented throughout the pre-application stage is in accordance with the Planning Act 2008 and associated guidance. This has been evidenced in **C5.1 Consultation Report [APP-021]**, which was submitted to the Planning Inspectorate and accepted for examination. The Applicant furthermore directs Mrs Skelton to the Applicant's response to this topic at Agenda Item 5q of **C8.1.5 Written Summary of the Applicants Oral Submissions and Responses at Issue Specific Hearing 1 [REP-051]**.
KS-05	Principle of Development	Decision Making Process	Vast projects such as this should not be forced onto communities when there is so much opposition. This is not democratic. My family has every right to defend what we have. Maintain our standard of life, wellbeing and our investment in nature.	The Applicant notes this comment. The Applicant notes this comment, and directs Mrs Skelton to the Applicant's previous response to this topic at response "GEN-12" in **C8.1.2 The Applicant's Responses to Relevant Representation [REP-049]**.
KS-06	Landscape and Visual Impact General	Landscape character impacts Consultation	As citizens of the UK, we expect to be treated fairly and equally, this proposal does not do that. There is no need to encircle our home in this careless and unsympathetic way. The developer	The Applicant notes this comment, and directs Mrs Skelton to the Applicant's previous response to this topic at response "LAN-04" in **C8.1.2 The Applicant's Responses to Relevant**

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			needs to respect all rural property as much as the surrounding villages and at least honour what was agreed during consultation. There is no need for collateral damage, we will not allow everything we hold dear to be sacrificed in the name of greed and bad planning!	**Representation [REP-049]**. The Applicant furthermore directs Mrs Skelton to the Applicant's response to this topic at Agenda Item 5q of **C8.1.5 Written Summary of the Applicants Oral Submissions and Responses at Issue Specific Hearing 1 [REP-051]**.
KS-07	Human health	Personal health and wellbeing as a result of the proposals	The thought of living inside this solar industrialised zone for the rest of our lives and knowing what little electricity is being generated is both depressing and infuriating. This proposal has my husband and I's mental health hanging by a thread.	The Applicant is cognisant of the importance of mental health and wellbeing, and so this has been assessed as part of the assessment of human health impacts, primarily in **C6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-053]**. The greatest level of effect on wellbeing is a moderate-minor adverse effect to access, desirability and use of recreational facilities in the countryside, anticipated during construction (see paragraphs 18.7.60 to 18.7.67) and decommissioning (see paragraphs 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]** which identifies no significant adverse effects to human health (including mental health). Personal wellbeing and mental health impacts as a result of the DCO application and examination process were not scoped into the ES assessment.

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				The Applicant considers that the consultation process undertaken (as described in **C5.1 Consultation Report [APP-021]**) has been sufficient to ensure members of the public have had suitable opportunity to engage with the pre-application process, and have had access to accurate information about the Scheme to ensure confidence in the assessment outcomes presented in the ES. This is corroborated by the positive Adequacy of Consultation responses received by all host and neighbouring local authorities **[AOC-001** to **AOC-024]**.
KS-08	General	Harms from the Scheme and the DCO process	The UK is a civilized nation and the unnecessary harm and discrimination caused by this proposal would be seen as unlawful.	The Applicant notes this comment, but respectfully disagrees that the Scheme causes unnecessary harm, is discriminatory, or has not followed the correct lawful process. The likely significant effects of the Scheme have been fully assessed in the Environmental Statement. A Non-Technical Summary of the Environmental Statement has also been provided as part of the DCO Application and an updated version has been submitted at Deadline 2. The **C7.12 Equality Impact Assessment [APP-351]** considers the potential for the Scheme to discriminate against groups of people with protected characteristics, Table 5.1 sets out the

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				areas for consideration and the assessment, finding no differential or disproportionate impact to protected characteristic groups is predicted in any area.
KS-09	Energy Need	Contribution of solar towards national energy generation	I am sure consideration will be given as to whether solar on this scale is really in the country's best interests. It is becoming quite clear that utility solar, though very well promoted, cannot deliver effectively for the UK energy sector and is merely supplemental.	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 **[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

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				Paragraph 9.4.4 concludes that the Proposed Development will contribute to national system adequacy and decarbonisation targets. 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. 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. Figure 8.2 **[APP-350]** shows how solar is expected to work alongside other renewable and low-carbon assets to meet demand throughout the year. The inclusion of batteries as part of the Scheme will allow the Scheme to store energy when it is in abundance and release it to the grid when it is needed.

Simon Skelton [REP-196]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
SS-01	Ecology and Biodiversity	Impact on existing wildlife	The scheme will have a serious impact on the biodiversity of the farm, which has been developed as a wildlife sanctuary. The land supports brown hare, deer, owl, harrier, white egret, water rail, fish, frogs, newts, bats, dragon flies, insects. Seasonally, rare farmland birds such as quail and turtle doves visit. The rare Black Redstart has bred on the land, and corncrake has been present and might breed.	Please refer to reference ECO-06 **C8.1.2 The Applicant's Responses to Relevant Representations [REP-049]** in respect of the potential for animals to be disturbed or impacted by the Scheme, reference ECO-03 for discussion of aquatic invertebrates, reference ECO-06 in respect of newt and hare, and references ECO-08 and ECO-09 in relation to the potential impacts to birds of prey.
SS-02	Landscape and Visual Impact	Residential amenity	The scheme will impact on amenity of residents of the dwelling. The property will be surrounded by panels, which will be visible from every window. The mass of panels will dominate the property.	**C6.3.8.2_A ES Appendix 8.2 Assessment of Potential Landscape Effects Revision A [REP-020]** (the 'LVIA') considers the impacts and effects on residential receptors as part of the assessment process including the proximity to people's houses to ensure the impacts and effects on the views and visibility are taken into account [paras. 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 [para. 8.4.12]. The detailed analysis is set

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				out at **C6.3.8.3_A ES Appendix 8.3 Assessment of Potential Visual Effects Revision A [EN010133/EX2/C6.3.8.3_A].** Voluntary consultation with individual property owners was undertaken throughout the duration of the Scheme development and the preparation of the ES including discussion over bespoke mitigation relevant to the individual properties. A number of meetings and visits to North Farm have therefore taken place. A number of meetings and visits to North Farm have therefore taken place, including initial contact by Lanpro to introduce the Scheme and take forward discussions in February 2022. The residents of North Farm were then visited by Lanpro on 13 June 2022 to retain engagement and prepare the detailed assessment relating to North Farm, which is set out at **C6.3.8.3_A ES Appendix 8.3 Assessment of Potential Visual Effects Revision A [EN010133/EX2/C6.3.8.3_A]**. This detailed assessment concludes that the visibility of the panels is mainly focussed from first floor windows of the main farmhouse to the south overlooking Willingham Road. To the south, the panels are offset by at least 240m within a landscape that supports a good network of

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				hedgerows and tree cover, which assist with their integration. Visibility to the north towards the panels is curtailed by existing woodland and to east, the panels are distanced at 870m, with the panels distanced at approximately 380m to the west.
SS-03	Landscape and Visual Impact	Impact on landscape character	The scheme will significantly change the character of the landscape, making it an industrialised zone. It will not be possible to adequately mitigate this through screening.	The proposed planting is unlikely to completely obscure all aspects of the Scheme, but the effectiveness of the planting, whether as a screening or softening measure is set out in the individual receptor sheets at **C6.3.8.3_A ES Appendix 8.3 Assessment of Potential Visual Effects Revision A [EN010133/EX2/C6.3.8.3_A].**
SS-04	Landscape and Visual Impact Scheme Description Noise	Setbacks from residential dwellings	Panels come close to the dwelling, with little buffer and ineffective screening, unlike other dwellings and villages close to the scheme which benefit from greater set backs. The applicant agreed to layout changes during pre-application consultation, including using the topography of the land behind the property and existing hedgerows as screening to limit visual impact. However, this has now been rescinded. As a result, the panels are now very close to the property.	Please refer to references EMH-01 and LAN-01 in **C8.1.2 The Applicant's Responses to Relevant Representations [REP-049]**. The design has developed between consultation and the submission of the Application. As set out in **C6.2.8_A ES Chapter 8 Landscape and Visual Impact Assessment Revision A [EN010133/EX2/C6.2.8_A]**, at Table 8.21, the landscape and visual impacts will be mitigated through the embedded mitigation that at least 50m will be provided between the boundary

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			The layout plan shown in Figure 15.9 of PIER, from Chapter 15 Noise and Vibration, shows the panels set back from the property, with no panels in field A3, the southern part of field A4 to the north, and fields C15-C20 to the south. The layout plan in the submitted scheme shows panels much closer to the property.	curtilage of the outer edge of the solar panels to residential properties. This is to allow for areas of vegetation to establish fully as screening. This is secured in **C7.15 Concept Design Parameters and Principles [REP-039]** for Work Nos. 1 to 4, being the solar array areas, at Table 2.1. The Concept Design Parameters and Principles are secured by Requirement 5 and Requirement 10 of **C3.1 Draft Development Consent Order [REP-006; REP-007]**.
SS-05	Landscape and Visual Impact	Ash dieback in existing screening hedgerow trees	Many of the existing trees that are being relied on for screening a suffering from ash dieback.	**C6.2.8_A ES Chapter 8 Landscape and Visual Impact Assessment Revision A [EN010133/EX2/C6.2.8_A]** has taken account of the visual impact of the solar panels/arrays and explored all options for minimising any effects and this has included consideration of the existing vegetation and where new planting will help supplement the tree cover in the hedgerows. Where hedgerows have previously been managed to create low, neat field boundaries, these are to be allowed to grow out and managed to a height of 5m with the addition of irregularly spaced hedgerow trees to help boost this overall

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				framework for the Scheme. Furthermore, the Scheme provides the scope to introduce new areas of planting and build upon the character.
SS-06	Landscape and Visual Impact	Lead time for planting maturity	Native hedging species that are to be used for screening will take 25 years to reach 5 metres in height and are ineffective when they lose their leaves.	**C6.2.8_A ES Chapter 8 Landscape and Visual Impact Assessment Revision A [EN010133/EX2/C6.2.8_A]** recognises that native hedge planting is likely to reach a maximum height of 3.5m at Year 15. This has been taken into consideration when assessing the likely visual impacts on residential properties in the vicinity of the Scheme (see Tables 8.104 and 8.108). The native hedging species are designed to complement the already robust hedgerow network that provides a cohesive framework. The field hedgerows are a very strong feature of the landscape and generally in good condition and the new native hedgerow planting or supplements to the existing hedgerows will help supplement the regular pattern of thickly hedged fields.
SS-07	Scheme Description	Location of mitigation areas in Cottam 1	The mitigation proposed for fields C26 and C28 could be swapped for the panels adjacent to the property, significantly reducing the impact on the property.	Fields C26 and C28 will be managed as set-aside habitat. This is a habitat that benefits ground nesting birds such as skylarks. Please refer to paragraph 4.8.23 of **C7.3_A Outline Landscape**

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				and Ecological Management Plan [REP-045]. The areas of set-aside habitat have been carefully selected in order to ensure that the mitigation habitat is suitable, having regard to the location of other elements of the Scheme and the surrounding area. Please see the Applicant's response to ExA Written Question 1.6.8 submitted at Deadline 2 for further details.
SS-08	Scheme Description	Size of solar infrastructure	The proposed solar panel height of 4.5 metres is excessive. Other schemes, such as Sunnica in Cambridgeshire, have proposed heights of 2.5 metres.	**C6.2.8_A ES Chapter 8 Landscape and Visual Impact Assessment Revision A [EN010133/EX2/C6.2.8_A]** (the 'LVIA') has taken account of the 50m off set from residential properties to ensure the best possible fit with their setting. This is secured in **C7.15 Concept Design Parameters and Principles [REP-039]** for Work Nos. 1 to 4, being the solar array areas, at Table 2.1. The Concept Design Parameters and Principles are secured by Requirement 5 and Requirement 10 of **C3.1 Draft Development Consent Order [REP-006; REP-007]**. As set out in paragraph 4.5.7 of C6.2.4_A ES Chapter 4 Scheme Description Revision A [REP-012], the maximum height of 4.5m is a maximum parameter for the tracker panels when at their greatest inclination (i.e., soon after sunrise and

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				before sunset) whilst the maximum height parameter for fixed panels is 3.5m. The photography and photomontage 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.
SS-09	Socio-Economics, Tourism and Recreation	Property value and rural business	The impact of the proposal is blighting the property, preventing it from being sold and curtailing future business opportunities, such as Bed and Breakfast.	Voluntary consultation with individual property owners was undertaken throughout the duration of the Scheme development and the preparation of the ES including discussion over bespoke mitigation relevant to the individual properties. A number of meetings and visits to North Farm have therefore taken place. A number of meetings and visits to North Farm have therefore taken place, including initial contact by Lanpro to introduce the Scheme and take forward discussions in February 2022. The residents of North Farm were then visited by Lanpro on 13 June 2022 to retain engagement and prepare the detailed assessment relating to North Farm, which is set out at **C6.3.8.3_A ES Appendix 8.3 Assessment of Potential Visual Effects Revision A [EN010133/EX2/C6.3.8.3_A]**. This detailed assessment concludes that the visibility of the panels is mainly focussed from first floor

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				windows of the main farmhouse to the south overlooking Willingham Road. To the south, the panels are offset by at least 240m within a landscape that supports a good network of hedgerows and tree cover, which assist with their integration. Visibility to the north towards the panels is curtailed by existing woodland and to east, the panels are distanced at 870m, with the panels distanced at approximately 380m to the west.
SS-10	Transport and Access Draft DCO	Use of access track used for residential access	Construction impacts will be significant. The access track is a single vehicle wide and unmetalled. Heavy construction traffic will damage the surface and will make access to and from the property difficult. There are concerns that the security of the property and of residents will be reduced. Access is currently controlled by a locked gate, which provides security. With the required volume of construction traffic, the level of security will be reduced. Construction workers will have access to the fields surrounding the isolated property, which will reduce the level of security.	The Outline Construction Environmental Management Plan **[APP-337]** (OCEMP) forms part of the Environmental Statement. Please refer to Section 2.2 that sets out the key roles and responsibilities in managing the Scheme's construction and general site arrangements. These roles and responsibilities will be confirmed in the detailed CEMPs but measures include vehicle movement and security measures. Also please refer to the Outline Construction Traffic Management Plan **[APP-135]**. Article 12 of **C3.1 Draft Development Consent Order [REP-006]** provides that the Applicant must compensate the person responsible for the repair of a road (usually the owner) for any loss or

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				damage which is caused as a result of the Applicant's use of the private road. The **outline Construction Environmental Management Plan [REP-016]** also includes a commitment that a road condition survey will be undertaken any private road affected by the Scheme, and defects resulting from construction activities will be corrected to the reasonable satisfaction of the owner.
SS-11	Scheme Description	Scheme layout and distance from grid connection	The Scheme is fragmented and a considerable distance from the grid connection. The Scheme is not well planned and cohesive.	The Scheme comprises a series of separate areas of land or Sites which are set within an extensive agricultural landscape. With large areas of land between each of the Sites, each is set apart by their associated features such as robust hedgerows, woodland and tree cover, intervening settlements and road and rail infrastructure. The design of the Scheme is cohesive taking an integrated approach across all topic areas through evolution of the design, layout and associated mitigation. There has been an iterative approach across the LVIA and this is guided by paragraphs 3.8, 3.19, 4.6, 4.7, 4.9, 4.11, 4.21, 4.23 and 4.30 of "Guidelines for Landscape and Visual Impact Assessment, Third Edition" (GLVIA3). This has involved the development of the **C7.3_B Outline Landscape and Ecological Management Plan [EN010133/EX2/C7.3_B**] and

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				C6.4.8.16.1_A to C6.4.8.16.10 _A Landscape and Ecology Mitigation and Enhancement Plans (Figures 8.16.1_A to 8.16.10_A) **[APP-305** to **APP-315]** and secured by Requirement 7 of Schedule 2 of **C3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C]**. This has involved ongoing consultation with stakeholders, including the community and regulatory authorities to ensure that the design responds to the needs of the Scheme. The separate parcels of land in the Scheme are placed far apart such that the solar panels are distributed 'in and amongst' the landscape allowing them to assimilate into the landscape to a comfortable degree. The presence of the intervening landscape also provides scope for areas of mitigation and the ability to build upon the connectivity of green infrastructure and ecology and nature conservation and retain the existing landscape pattern.
SS-12	Landscape and Visual Impact	Accuracy of photomontages	The viewpoint photomontages produced in support of the LVIA are misleading. The panels as shown do not represent accurately the height of the panels. This is demonstrated by a photograph showing a 4.5m gauge stick in the same location as Figure 8.14.76 LCC-C-I Viewpoint 76	The Scheme utilised a photography and visualisation team comprised of leading photography and visualisation specialists from across the UK. Co-ordinated by Lanpro and led by Mike Spence of MSE.

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			Photography Photomontage [APP-274]. This undermines confidence in the accuracy of the photomontages.	Mike Spence has over 30 years photography and visualisation experience, working on a wide range of complex infrastructure projects, from major Highways schemes, to Carbon Capture, the power station development, tall buildings and solar projects across the UK. Crucially, Mike was a key technical author of the Landscape Institute's TGN 06/19 on visualisation of development proposals. He has worked alongside The National Trust, Historic England, English Heritage, RBG Kew, Historic Royal Palaces as well as NatureScot (formerly Scottish Natural Heritage) for whom he is currently working on updates to their windfarm visualisation guidance. The photomontage work undertaken for the project 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 and the Landscape Institute's guidance 'Visual Representation of Development Proposals Technical Guidance Note 06/19 (TGN 06/19)'.

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				The photomontages produced comprise of a series of overlapping single frame 50mm photographs taken from a surveyed position using GNSS equipment to achieve a locational accuracy down to 1cm in eastings, northings and height. These overlapping images were cylindrically re-projected to ensure consistent geometry was achieved. The camera equipment used and technical methodology followed is set out within C6.3.8.15 ES Appendix 8.1.5 in detail. The survey verified photography was then matched with a geo-referenced accurate 3D Model built from layout data, OS MasterMap, and Environmental Agency LIDAR DTM (2m) data, with 3D point data used for checking horizontal and vertical alignment. Visualisations are presented as either AVR 0, 1, 2 or 3. The differences between each AVR are explained in the Landscape Institute's TGN 06/19. The resultant visualisations are highly accurate and therefore, the photomontages are considered to fairly demonstrate the correct positioning, scale and massing of the development in its local and wider context.

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				Please refer to the Technical Methodology accompanying the Viewpoint Photomontages for further information **[APP-069 – APP-073]**.
SS-13	Landscape and Visual Impact Ecology and Biodiversity	Height of screening	Hedgerow heights of 5m cannot be achieved on Willingham Road as overhead power lines run along the hedge line.	Noted.
SS-14	Site Selection and Alternatives	Land gradient	Selecting sites that use land gradient as screening would be more effective.	Please refer to ES Chapter 5 Alternatives and Design Evolution **[APP-040]** that sets out the main alternatives and the indication of the main reasons for the choice of sites. Please refer to response CJM-12 **C8.1.2 The Applicant's Responses to Relevant Representations [REP-049]**.
SS-15	Soils and Agriculture Energy Need	Use of agricultural land	The cumulative loss of farmland in the immediate area, approximately 15% within a 6 mile radius, is disproportionate. Farmland is precious and finite. The proposed use is not an efficient use of farmland. Other forms of power generation, such	Please refer to responses SPM-03, KPC-07 and ALT-05 in **C8.1.2 The Applicant's Responses to Relevant Representations [REP-049]**.

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			as power stations, produce more electricity while using less land. Solar panels produce no electricity for half of the time.	
SS-16	Landscape and Visual Impact Socio-Economics, Tourism and Recreation	Views from PRoWs	Views from the historic B1398 "Middle Street" and adjoining footpaths across the Trent valley will be ruined. The amenity of users of footpaths and bridleways, such as those off Willingham Road, will be destroyed.	**C6.2.8_A ES Chapter 8 Landscape and Visual Impact Assessment Revision A [EN010133/EX2/C6.2.8_A]** (the 'LVIA') (submitted at Deadline 2) looks to provide landscape mitigation that seeks to enhance the landscape character of the Study Area and to reduce the visibility of the Scheme from 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). 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-

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				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.
SS-17	Glint and Glare	Glare to motorists and views	Significant glint and glare would be produced by vast areas of giant sun tracking solar panels causing danger to motorists and spoiling these popular views.	The impacts of glint and glare from the tracking system upon road receptors have been assessed. Where impacts are predicted to be significant mitigation will be implemented. See Section 7.2.2 of **C6.3.16.1 ES Appendix 16.1 Solar Photovoltaic Glint and Glare Study [APP-140]**. The landscape mitigation measures set out in para. 8.6.1-22 and para. 8.8.1-9 of **C6.2.8_A ES Chapter 8 Landscape and Visual Impact Assessment Revision A [EN010133/EX2/C6.2.8_A]** provides new planting to mitigate the potential impacts and effects of glint and glare, which will include new native hedgerows and tree cover, and this will also include the management and maintenance of this new planting.
SS-18	Landscape and Visual Impact Ecology and Biodiversity	Effectiveness of proposed screening	The proposed planting will not be effective. There is no proposal for plant protection. Browsing animals such as brown bare and deer will decimate planting. Comprehensive exclusion, not tree guards, is required. The proposed security	The **C7.3 Outline Landscape and Ecological Management Plan [REP-045]** (the 'OLEMP') sets out how new planting will be managed and monitored over the lifetime of the Scheme.

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			fencing will direct browsing animals towards the new planting.	
SS-19	Landscape and Visual Impact Ecology and Biodiversity	Monitoring of landscape screening	It is likely that hedges will be cut back and not maintained at the proposed heights for screening. What monitoring will there be of this? What will be consequences be of not maintaining heights?	Where hedgerows have previously been managed to create low, neat field boundaries, these are to be allowed to grow out and manged to a height of 5m with the addition of irregularly spaced hedgerow trees to help boost this overall framework for the Scheme. **C7.3 Outline Landscape and Ecological Management Plan [REP-045]** (the 'OLEMP') sets out this hedgerow management and this is revised and secured by Requirement 7 of Schedule 2 to **C3.1 Draft Development Consent Order [REP--6]**.
SS-20	Landscape and Visual Impact	Effectiveness of proposed screening	The associated equipment cannot be adequately screened by hedgerows.	Please refer to response 7A-12 in **C8.1.2 The Applicant's Responses to Relevant Representations [REP-049]**.
SS-21	Ecology and Biodiversity	Biodiversity net gains	The proposed biodiversity gains are not a direct result of the Scheme but is a by-produce of the mitigation proposals. These biodiversity gains could therefore be achieved with continued agricultural use of the land.	The main driver for biodiversity net gain as set out in **C6.3.9.12 ES Appendix 9.12 Biodiversity Net Gain Report [APP-089]** is the reversion of land under intensive agriculture to low input pasture or meadow grassland that is managed specifically to promote a species-rich habitat. In many cases, the reversion from intensive agriculture to pasture or meadow grassland with additional hedgerow, scrub, tree and wetland

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				habitat creation will bring about positive effects for wildlife. In particular, terrestrial and aquatic invertebrates, botanical diversity, small mammals and many species of bird all stand to benefit. Please refer to response 7A-16 in **C8.1.2 The Applicant's Responses to Relevant Representations [REP-049]** for further information.
SS-22	Draft DCO	Hedgerow removal powers	The draft DCO proposes to remove many miles of hedgerow, including the property's own boundary hedges which contribute to biodiversity. Giving these powers to the applicant would be catastrophic for wildlife and the landscape. New hedge planting cannot replace the lost biodiversity.	The Applicant directs Mr Skelton to the Applicant's response to this topic at Agenda Item 5s of **C8.1.5 Written Summary of the Applicants Oral Submissions and Responses at Issue Specific Hearing 1 [REP-051]**.
SS-23	Ecology and Biodiversity	Unknown impacts on biodiversity from the Scheme	In the absence of independent research into the effects of ground-mounted solar panels on biodiversity, approving this scheme is a gamble.	The Applicant respectfully disagrees with this comment. 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

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				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 [REP-046]** as secured by Requirements 8 and 7 of Schedule 2 to **C3.1_B Draft Development Consent Order Revision B [REP-006]** respectively.
SS-24	Human Health	Health and wellbeing	Impacts on residents' welfare, quality of life and mental health have not been fully considered.	The Applicant respectfully disagrees with this comment. Human health and wellbeing has been assessed throughout the Environmental Statement, and is summarised in Section 21.5 of **C6.2.21 ES Chapter 21 Other Environmental Matters [APP-056]**. 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]**.

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				The greatest level of effect (moderate-minor adverse) to access, desirability and use of recreational facilities 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]** which identifies no significant adverse effects to human health (including mental health).

Simon Skelton [REP-197] (Summary of Oral Submission to OFH1)

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
SS-25	Energy Need	Energy need against use of agricultural land	To generate 100% of the UKs power from nuclear or even gas for that matter, would mean the loss of not much more than 3000 acres of land. Yet the Cottam Solar Project would cover around 3000 acres of land and generate only 0.17% of the UKs electricity and arguably at the wrong time of day and year. Stating that solar schemes would produce large amounts of low carbon electricity is misleading and without context. For context, Sizewell C in Suffolk will produce 7% of the UKs power and only cover 170 acres. In relation to national need, the CSP would not produce large amounts of low carbon electricity, but it would consume large and unproportionate amounts of farmland in one area.	The Applicant directs Mr Skelton to the Applicant's response to this topic at response "SSk-01" of **C8.1.4 Written Summary of the Applicants Oral Submissions and Responses at Open Floor Hearing 1 [REP-050]**. Please also refer to response FPM-20 in **C8.1.2 The Applicant's Responses to Relevant Representations [REP-049]**.
SS-26	Alternatives and Design Evolution	Efficiency of solar	To further highlight Solar's extremely low power density, (but purely hypothetically.) Solar would need to cover around 1.7 million acres of land to generate the current UKs annual 300TWh demand, and again its supply would be totally out of sync with demand, providing nothing when Grid urgently needs generation such as during the dark Winter morning and evening peaks.	The Applicant directs Mr Skelton to the Applicant's response to this topic at response "SSk-01" of **C8.1.4 Written Summary of the Applicants Oral Submissions and Responses at Open Floor Hearing 1 [REP-050]**. Please also refer to response FPM-20 in **C8.1.2 The Applicant's Responses to Relevant Representations [REP-049]**.

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
SS-27	Energy Need	Contribution of solar towards national energy generation	Solar is not helping our electricity shortfall predicament. With its limited generation curve and peaking at midday, this cannot be relied on as a primary national generator. Wind is many times more robust and a far higher yielding renewable option.	The Applicant directs Mr Skelton to the Applicant's response to this topic at response "SSk-01" of **C8.1.4 Written Summary of the Applicants Oral Submissions and Responses at Open Floor Hearing 1 [REP-050]**. Please refer to response 7A-28 in **C8.1.2 The Applicant's Responses to Relevant Representations [REP-049]**.
SS-28	Alternatives and Design Evolution	Alternative locations for solar - rooftop	Solar is far better suited to rooftop mounting where it has an undeniably efficient, and important role to play. Ground mounted solar is a criminal mismanagement of farmland, is unnecessary and cannot be justified.	The Applicant directs Mr Skelton to the Applicant's response to this topic at response "SSk-01" of **C8.1.4 Written Summary of the Applicants Oral Submissions and Responses at Open Floor Hearing 1 [REP-050]**. Please also refer to response CJM-17 in **C8.1.2 The Applicant's Responses to Relevant Representations [REP-049]**.
SS-29	Landscape and Visual Impact	Landscape impact	The devastation on the landscape, and the harm to rural communities of which I am proudly part of, cannot be tolerated for such little national gain.	The Applicant directs Mr Skelton to the Applicant's response to this topic at response "SSk-01" of **C8.1.4 Written Summary of the Applicants Oral Submissions and Responses at Open Floor Hearing 1 [REP-050]**. Please also refer to responses CPC-07 and FPM-03 in **C8.1.2 The Applicant's Responses to Relevant Representations [REP-049]**.

Simon Skelton [REP-198] (Written response to ISH1)

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
SS-30	Cumulative Assessment	Interrelationship with live and emerging DCO applications for solar NSIPs	ITEM 4 The interrelationship between Cottam (CSP), Gate Burton, West Burton, Tillbridge, Heckington Fen and Mallard Pass is an incomplete picture and dilutes the impact caused by the unparalleled quantity of solar NSIP applications for Lincolnshire. The other 4 that we know of, Beacon Fen, Springwell, Fosse Green and Temple Oaks are now on the NSIP website with applications expected next year. Three of these are also closer to the CSP than both Mallard Pass and Heckington Fen. Another solar NSIP proposal, the eleventh which crosses the West Lindsey border has just been made public knowledge, One Earth Solar.	The Applicant directs Mr Skelton to the Applicant's response to this topic at Agenda Item 4b of **C8.1.5 Written Summary of the Applicants Oral Submissions and Responses at Issue Specific Hearing 1 [REP-051]**. Please refer to response FPM-04 in **C8.1.2 The Applicant's Responses to Relevant Representations [REP-049]**.
SS-31	Transport and Access Socio-economics, Tourism and Recreation	Use of public rights of way	ITEM 5 e) The applicant has thousands of acres of land at their disposal, yet they still ask for the use of public rights of way for construction and maintenance. This is seeking unnecessary permission that would be dangerous and inconvenient to the public.	The Applicant directs Mr Skelton to the Applicant's response to this topic at Agenda Item 5e and 5f of **C8.1.5 Written Summary of the Applicants Oral Submissions and Responses at Issue Specific Hearing 1 [REP-051]**.

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
SS-32	General	Informing of Affected Persons	Article 23(2) (c) Private Rights. m) I was shocked to find out in public that I am classed as an "Affected Person" I have no recollection of being informed of this in the past and have still not received any recent written confirmation from IGP.	The Applicant directs Mr Skelton to the Applicant's response to this topic at Agenda Item 5q of **C8.1.5 Written Summary of the Applicants Oral Submissions and Responses at Issue Specific Hearing 1 [REP-051]**.
SS-33	Transport and Access	Use of access used by resident	The single unmetalled track that provides sole access to our property and the farmland beyond, would become extremely dangerous. Heavy construction traffic would destroy the surface and make it very difficult to enter or leave our own home. Traffic would increase from practically zero to an unconscionable amount. This track is gated and locked for security and has provided us with peace of mind for over 20 years. This would all be lost with solar employees having access and freely roaming the site adjacent to our isolated farmhouse at all hours during construction and operation.	Please refer to the response to SS-10, above.
SS-34	Draft DCO	Hedgerow removal powers	The Draft DCO also seeks "carte blanche" permissions to remove miles upon miles of hedgerow including my own boundary hedges that are biodiverse and offer the only screening to this high impact proposal. (Important hedgerows H154 and H155). I believe the dDCO	The Applicant directs Mr Skelton to the Applicant's response to this topic at Agenda Item 5s of **C8.1.5 Written Summary of the Applicants Oral Submissions and Responses at Issue Specific Hearing 1 [REP-051]**.

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
			literally lists every hedge in and around the CSP sites and states their entire individual lengths. This again is asking for unnecessary freedom to cause harm with potentially unlimited and damaging powers.	
SS-35	Scheme Description	Lifetime of the Scheme	Lastly, I must comment on the lifespan and decommissioning of this proposal. I was under the impression the life was 40 years, but the Applicant suggests this could be unlimited due to a maintenance regime which would in essence make the CSP forever fit for use. The CSP must have a definitive lifetime, along the lines of the serviceable life of the original generating and storage apparatus and not its continual replacement, as suggested. The current proposal with a rolling commissioning/decommissioning scenario is an unacceptable burden to be endured by the same communities.	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 **[REP-006]** to require the Scheme to be decommissioned after 60 years.
SS-36	Draft DCO	Decommissioning trigger	The final decommissioning protocol seems even more worrying with no triggering mechanism. This would gift any subsequent operator the ability to avoid decommissioning.	The Applicant directs Mr Skelton to the Applicant's response to this topic at Agenda Item 5c of **C8.1.5 Written Summary of the Applicants Oral Submissions and Responses at Issue Specific Hearing 1 [REP-051]**.

Alison Dudley [REP-203]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
AD-01	Soils and Agriculture Draft DCO	Use of agricultural land Compulsory acquisition powers	The fields and land which will be acquisitioned should remain for farming	**C7.11 Statement of Need [APP-350]** sets out how the Scheme helps to achieve the UK government priorities of zero-carbon energy generation; energy security; and affordable energy. As set out in **C6.3.5.1 ES Appendix 5.1 Site Selection Assessment [APP-067],** selection of the Site accounted for agricultural land classification. Paragraph 3.3.22 states that the Scheme maximises the utilisation of low grade, non best and most versatile (BMV) agricultural land with 95.9% of the land being classified as non BMV land.
AD-02	Alternatives and Design Evolution	Alternative locations for panels - rooftops	Solar panels are large, high, eye sore and should be placed on homes not farming land. There has been vast house building in the area and these could and should be linked to the grid for panels,	**C6.2.8_A ES Chapter 8 Landscape and Visual Impact Assessment Revision A [EN010133/EX2/C6.2.8_A]** (the 'LVIA') considers the visual effects of the Scheme and the assessment includes a suite of viewpoints that cover a wide range of visual receptors, including public locations such as transport routes, PRoW and residential properties. The visual effects are set out in **C6.3.8.3_A ES Appendix 8.3 Assessment of Potential Visual Effects Revision A [EN010133/EX2/C6.3.8.3_A]**, which shows that some effects on visual

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
				receptors will be significant at construction and year 1 of operation, but with mitigation this is reduced across the majority of the landscape receptors to not significant at year 15 of operation.

Natural England [REP-207]

Reference	Theme	Issue	Summary of Issue Raised	Applicant's Response
NE-03	Draft DCO	Time limit on DCO	Natural England's comments regarding the non-time limited nature of this consent remain unchanged. We consider that during the life of the proposed development it is likely that there will be a reduction in potential agricultural production over the development area subject to the solar panel arrays and habitat enhancement. If not time limited as described, the areas subject to a change in land use or land management (i.e. The land under the solar arrays and the land subject to habitat enhancement) has the potential to lead to the permanent reduction in the lands potential agricultural production.	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 **[REP-006]** to require the Scheme to be decommissioned after 60 years.