

Cottam Solar Project

Applicant's Response to Local Impacts Reports

Prepared by: Lanpro Services
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Issue Sheet

Report Prepared for: Cottam Solar Project Ltd.

Applicants Response to Local Impacts Reports

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1 Introduction

1.1 Purpose of this Document

This document provides Cottam Solar Project Limited (the 'Applicant's') response to the Local Impact Reports ('LIRs') relating to the Development Consent Order Application (the 'Application') for Cottam Solar Project (the 'Scheme').

The LIRs were submitted to the Planning Inspectorate at Deadline 1 (17 October 2023) from the following local authorities:

- Bassetlaw District Council (BDC) [REP-080];
- Lincolnshire County Council (LCC) [REP-085];
- Nottinghamshire County Council (NCC) [REP-086];
- West Lindsey District Council (WLDC) [REP-091];

The LIRs were published on 25 October 2023 to the Planning Inspectorate's website (PINs Reference: EN010133).

Local authorities have worked proactively with the Applicant during the preparation of the Application and since its submission and the Applicant thanks officers for their time.

Table 2.1 below sets out comments made by the above Local Authorities in their LIRs and the Applicant's responses to them.

Where applicable, paragraph or page numbers are provided to assist cross referencing to the relevant LIR.

References to the Application and examination documentation, as submitted to the Planning Inspectorate on 12 January 2023, are provided in accordance with the referencing system as set out in the Planning Inspectorate's 'Cottam Solar Farm Examination Library'.

Revision suffixes have also been attached to documents which, since submission, have been revised for and resubmitted by Deadline 1 to the Planning Inspectorate.

2 Applicants Response to Local Impacts Reports

Table 2.1: Applicants Responses to Local Impact Reports

LIR Ref.	Summary	Applicant's Response
Air Quality		
WLDC 18.1	<p>WLDC raise the following points arising from the review of the Air Quality chapter of the Environmental Statement:</p> <p><i>"The main risk to air quality will arise during construction of the Scheme on its own. The impact will be multiplied on a cumulative level in the event the other solar schemes were granted development consent."</i></p>	Assessment of the potential risks and the appropriate mitigation measures are presented within the Dust Management Plans [APP/C6.3.17.1, APP/C6.3.17.2, & APP/C6.3.17.3] for each of the specific sites.
WLDC 18.7 WLDC 18.8	WLDC has identified no positive and no neutral impacts during construction and decommissioning.	The Applicant notes this comment. The dust assessment and mitigation measures have been undertaken and presented to ensure that any potential negative impacts are minimised.
WLDC 18.9 WLDC 18.10 WLDC 18.11	<p>WLDC identify the following negative impacts during construction and decommissioning:</p> <ol style="list-style-type: none"> <i>"Potential impacts during construction and decommissioning include dust and particulate matter emissions from site activities, such as demolitions, earthworks (particularly during dry months), construction, vehicle movements, or from construction materials.</i> <i>The main potential effects of particulates/dust are:</i> <ul style="list-style-type: none"> <i>Visual – dust plume, reduced visibility, coating and soiling of surfaces leading to annoyance, loss of amenity, the need to clean surfaces;</i> <i>Physical and/or chemical contamination and corrosion of artefacts;</i> <i>Coating of vegetation and soil contamination; and,</i> <i>Health impacts due to inhalation, e.g. asthma or irritation of the eyes.</i> <i>All dust effects are considered to be direct, temporary, short-term and reversible in nature. Following the implementation of site-specific mitigation measures, included within the Outline CEMP, the significance of the effects from dust and emissions is considered to be negligible and not significant in EIA terms."</i> 	The Applicant notes WLDC's conclusion that the effects would not be significant. Assessment of the potential effects and the identified appropriate mitigation measures are presented within the Dust Management Plans [APP/C6.3.17.1, APP/C6.3.17.2, & APP/C6.3.17.3] for each of the specific sites.
WLDC 18.12 WLDC 18.13	WLDC has identified no positive and no neutral impacts during operation.	The Applicant's position aligns with WLDC's comments.
WLDC 18.14	<p>WLDC identify the following negative impact during operation:</p> <p><i>"There is a potential fire risk associated with certain types of batteries such as lithium ion, which could result in smoke being blown downwind to nearby human and ecological receptors. Whilst there is low risk of adverse effects at the closest receptors, in the case of a fire at the proposed development, good practice safety measures will be implemented. Following the implementation of these measures during an occurrence of fire incident, the effects are determined to be negligible which is not significant in EIA terms.</i></p>	The assessments undertaken to inform the Air Quality ES Chapter [APP/C6.2.17] conclude that the impacts during operation will be negligible and not significant.
WLDC 18.15 WLDC 18.16	<i>"The Scheme does not include any fixed plant which may give rise to industrial emissions, such as Combined Heat and Power (CHP) or boilers, therefore cumulative effects from industrial emission impacts will be not assessed.</i>	The Applicant notes these comments. The assessments undertaken to inform the Air Quality ES Chapter [APP/C6.2.17] have screened out further assessment of fixed plant and vehicle emissions, and conclude that the impacts during operation will be negligible and not significant.

LIR Ref.	Summary	Applicant's Response
WLDC 18.17	<p><i>The cumulative traffic air quality effects has been re-assessed by considering other NSIP projects in this locality for similar developments along with planning applications for the same. It is noted that there are a number of other NSIPs in this locality that are at a similar stage to this application; these have not yet attained permission but will be considered within the heading of cumulative impacts.</i></p> <p><i>The anticipated, worst-case, vehicle movements associated with the Scheme, on any single road during the construction phase are forecast to be approximately 115 HGV AAWT movements, and 466 car and LGV AAWT movements. Following conversion from AAWT to AADT for the purposes of air quality assessment criteria consideration, the worst-case flows are anticipated to be 99 HGV movements, and 399 car and LGV movements. Additionally, it should be noted that these numbers do not account for further dispersion of vehicles along different sections of the A15. It can be assumed that these vehicle movements would be split, with some travelling to/from the north and other to/from the south. As such, it is anticipated that the cumulative vehicle numbers would not exceed the 'Indicative criteria for requiring an air quality assessment' detailed within IAQM Guidance on 'Land-use planning & development control: Planning for air quality', January 2017 and, therefore, air quality modelling for cumulative traffic assessment will be not required."</i></p>	The Applicant notes these comments.
Alternative and Design Evolution		
WLDC 6.1 WLDC 6.2 WLDC 6.3 WLDC 6.4 WLDC 6.5	<p>WLDC identify the following concerns regarding site selection, alternatives and design:</p> <ol style="list-style-type: none"> 1. <i>"The Applicant has stated that 'it would be highly unlikely that a single site of this size would be available within sufficient proximity to the Cottam Points of Connection (POC)'. However, the Gate Burton scheme, which will also utilise the Cottam POC, has demonstrated that a largely contiguous scheme is achievable. Similarly the proposed Tillbridge application have also shown that a large contiguous scheme is achievable.</i> 2. <i>The Scheme's study area of 20km is more than twice the size of the Gate Burton study area (8km).</i> 3. <i>There is a lack of focus on the cumulative transport impacts during the construction phase within the grid corridor.</i> 4. <i>The Applicant suggests that required site area for a 600MW solar would be 1,300 hectares excluding cable connection routes. This rationale is questioned as the Gate Burton is 823 ha and would provide approximately 531MW. This is 88% of the 600MW Cottam has. If 1,300 hectares are required for Cottam, then Gate Burton would require a site area of 1,100 ha. This is not the case and shows ineffective use of land by Cottam. If the Scheme had followed the Gate Burton's principles, then Cottam should only need approximately 990 hectares. Moreover, the entirety of the Longfield Solar Farm was contained within 453 hectares of land for PV Panels, BESS, Grid Connection Route, Bulls Lodge Substation Extension, Site Access Works and associated infrastructure including landscaping and biodiversity measures.</i> 5. <i>The Applicant consistently uses phrases such as 'network of sites' and does not follow a contiguous design approach. The division of the Scheme into four distinct units, i.e. Cottam 1, 2, 3a and 3b, demonstrates the lack of good design. This is particularly in</i> 	<ol style="list-style-type: none"> 1. In paragraph 2.1.10 of the Site Selection Report [APP-067], the Applicant acknowledges the difficulties in finding a single site of approximately 1300ha and, having undertaken its site selection process which prioritised the use of non-BMV land as detailed within the Site Selection Report, did not find a single suitable site of this size. The Gate Burton Scheme mentioned by the Council is a largely contiguous site but has a smaller site area than Cottam, at 824 ha, as described in paragraph 1.2.2 of ES Chapter 1 (EN010131/APP-010). This corresponds to its smaller grid connection export capacity of 500MW set out at paragraph 1.1.8 of the Planning Design and Access Statement (EN010131/APP-005) and is not therefore directly comparable with Cottam. Gate Burton also contains a higher percentage of BMV land at 12.3% (EN010131/REP2-046) compared to 4.1% at Cottam (ES Chapter 19 Soils and Agriculture –Rev A [REP-010]). The Tillbridge application has not yet been submitted for examination so the finalised site details of this Scheme are not yet available. However, with a grid connection export capacity of 500MW as set out within the Tillbridge Solar Project Information Booklet – Introducing our Proposals for Statutory Consultation 30 May – 11 July 2023, it is expected that the final site size would be less than Cottam unless particular site characteristics or constraints dictate otherwise. The Gate Burton land was discounted from the Cottam site selection process, as it was already the subject of option agreements for the Gate Burton scheme and was not therefore identified as being an available site. 2. The Gate Burton applicant was able to find a site with willing landowners within 8km of the Point of Connection (POC). 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. The land required for the Scheme has been demonstrated within C6.3.5.1 ES Appendix 5.1 Site Selection Assessment [APP-067] to perform better than 8 of the assessed Potential Development Areas (PDAs) and equal to the remaining one following the site selection process. Consequently, there are no obviously more suitable locations for the Scheme within the Search Area.

LIR Ref.	Summary	Applicant's Response
	<p><i>relation to Gate Burton and the forthcoming Tillbridge schemes within West Lindsey where a contiguous scheme has been designed."</i></p>	<ol style="list-style-type: none"> 3. At the site selection stage, which was undertaken early in the Scheme's evolution, specific details of other cumulative sites and their grid connection corridors were not known and could therefore not be considered in detail. As proposals have evolved the Gate Burton, Tillbridge, West Burton and Cottam Schemes have worked together to minimise construction impacts within the shared grid connection corridor as detailed within C8.1.8_A Joint Report on Interrelationships between Nationally Significant Infrastructure Projects Revision A [EN010133/EX2/C8.1.8_A]. ES Chapter 14: Transport and Access [APP-049] concludes that there are not expected to be any significant effects in relation to Transport and Access as a result of the construction of the Scheme. Construction traffic impacts will be managed through the Construction Traffic Management Plan [C6.3.14.2_B] which is secured through requirement 15 of the DCO. 4. The Gate Burton Scheme has a 500MW grid connection export capacity compared with 600MW for Cottam, as set out at paragraph 1.1.8 of the Planning Design and Access Statement (EN010131/APP-005) for that project. It is normal for solar schemes to include an element of 'over-planting' (See section 7.7 of Statement of Need [APP-350]) hence paragraph 6.4 of the WLDC LIR refers to a 531MW generating capacity for Gate Burton, despite it having a grid connection agreement to export 500MW. However, for site selection purposes, the directly comparable figures are 500MW for Gate Burton compared to 600MW for Cottam. The final Cottam Scheme measures 1,188.52 ha excluding Cable Route Corridors, means of access and the Cottam 1 permissive path as set out within paragraph 2.2.1 of C7.5_B Planning Statement Revision B [EN010133/EX2/C7.5_B]. The 1300ha figure referred to within the WLDC LIR was the initial land area sought by the Applicant as explained at paragraph 2.1.10 of the Site Selection Report [APP-067]. This area was later refined downwards as the Scheme design evolved, as explained within ES Chapter 5: Alternatives and Design Evolution [APP-040]. As explained at paragraph 2.1.10 of the Site Selection Report [APP-067], there needs to be a degree of flexibility in the amount of land required to generate each 50MW of energy. The precise area of land required will be dependent upon individual site constraints, mitigation measures and also the amount of land set aside for landscaping and ecology. The BNG Report [APP-089] shows that a net gain of 96.09% for habitat units, 70.22% for hedgerow units and 10.69% for river units is anticipated to be achieved through the Cottam Scheme. Each individual scheme therefore has its own particular requirements, but both Gate Burton and Cottam land areas are within the range of 75ha to 100ha per 50 MW set out at paragraph 2.1.10 of the Site Selection Report [APP-067] 5. The Applicant respectfully disagrees that the division of the site into four distinct units, i.e. Cottam 1, 2, 3a and 3b demonstrates a lack of good design. See Section 6.4 of the Planning Statement which 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 [REP-039] sets out design parameters and principles that apply across the sites.
<p>WLDC 6.59 WLDC 6.60</p>	<p><i>"Positive: The Scheme sought to exclude BMV land from the Scheme so far as is practicable. Neutral: None."</i></p>	<p>The Applicant's position aligns with WLDC's comments.</p>

LIR Ref.	Summary	Applicant's Response
WLDC 6.61	<i>"The design of the Scheme does not seek to create a contiguous site and treats the 'individual sites' as 'part of a network'. This suggests that the Scheme is considered a series of separate solar farms that connect together in order to connect to the Cottam POC."</i>	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 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 [REP-039] sets out design parameters and principles that apply across the sites.
WLDC 6.62	<i>"A search area of 20km is considered significant. This is particularly large when considering the Gate Burton search area was only 8km and was considered the maximum viable distance for a new solar farm. This is because the further a solar farm is from the point of connection, the less efficient transmission to the grid becomes and the connection becomes significantly more costly."</i>	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. The Gate Burton applicant was able to find a site with willing landowners within 8km of the POC. No further suitable sites were identified within 8km of the POC for the Cottam Solar Project as explained in detail within the Site Selection Report [APP-06] however, the Applicant extended the search area until suitable sites were found. These are located within 20km of the POC and are located close enough to the POC to provide a viable scheme. The land required for the Scheme has been demonstrated within C6.3.5.1 ES Appendix 5.1 Site Selection Assessment [APP-067] to perform better than 8 of the assessed Potential Development Areas (PDAs) and equal to the remaining one following the site selection process. Consequently, there are no obviously more suitable locations for the Scheme within the Search Area.
WLDC 6.63	<i>"The assessment does not consider construction access point via two-way highways to minimise ecological and traffic impacts."</i>	The Site Selection Assessment [APP-067] was undertaken at an early stage of Scheme development. Paragraph 2.1.4 of the NPS EN-1 4.4.3 states "the consideration of alternatives in order to comply with policy requirements should be carried out in a proportionate manner." The assessment is therefore high level and primarily desk based. This approach is considered reasonable and proportionate and complies with the aforementioned policy. Construction access points were considered in detail through the evolution of the Scheme design as set out in Tables 5.5 and 5.10 of ES Chapter 5: Alternatives and Design Evolution [APP-040], and construction access has been assessed in ES Chapter 14: Transport and Access [APP-049] and no significant transport and access effects have been identified.
WLDC 6.64	<i>"The project has failed to avoid all BMV agricultural land. The lifespan of the project (40 years) is such that the impact will have the effect of being permanent. No evidence or basis upon which to proclaim that the land would be improved, or able to be used for agriculture post-decommissioning."</i>	Only 4.1% of the land within the Sites is classified as BMV land (See Table 19.10 of ES Chapter 19 Soils and Agriculture –Rev A [REP-010]). Arable use of the land is temporarily curtailed for the proposed 60 year duration of the solar farm development, and following the end of the operational lifetime for the Scheme, there is a requirement that it must be decommissioned. Specifically, Requirement 21 of Schedule 2 to the draft DCO submitted at Deadline 1 [REP-006] requires the Scheme to be decommissioned after 60 years. Paragraph 3.1.4 of the outline Soil Management Plan [EN010133/EX2/C6.3.19.2_A] makes it clear that adoption of the principles contained within the outline Soil Management Plan will conserve the soil resource, both in terms of volume and its functional capacity for the support of agricultural production. As a result, there is not anticipated to be any degradation of the baseline ALC grade following decommissioning work.

LIR Ref.	Summary	Applicant's Response
WLDC 6.65	<i>"The assessment considers national landscape designations but does not appear to carry out a detailed assessment of the impact of local landscape character, including the impact on the designated Area Of Great Landscape Value (AGLV), and visual effects."</i>	The Landscape and Visual Impact Assessment (LVIA) contained within C6.2.8_A ES Chapter 8 Landscape and 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. For further information, please refer to C6.3.8.2_A ES Appendix 8.2 Assessment of Potential Landscape Effects Revision A [REP-020] which includes 8.2.1-8.2.12. These associated appendices provide a detailed assessment of landscape effects on each landscape receptor.
WLDC 6.66	<i>"The use of construction access points from single lane minor roads despite also proposing two from two-way highways. The justification for the inclusion of these access points is not provided."</i>	Please refer to response to WLDC 6.63 above.
WLDC 6.67	<i>"Lack of detailed consideration of cumulative transport impacts during the construction phase within the grid corridor. A commitment to work collaboratively is expressed, however it appears that limited consideration was given to the potential impact (5-7 years in sequence or 2-3 years concurrently) at the site selection stage."</i>	<ol style="list-style-type: none"> At the site selection stage, which was undertaken early in the Scheme's evolution, specific details of other cumulative sites and their grid connection corridors were not known and could therefore not be considered in detail. As proposals have evolved the Gate Burton, Tillbridge, West Burton and Cottam Schemes have worked together to minimise construction impacts within the shared grid connection corridor as detailed within C8.1.8_A Joint Report on Interrelationships between Nationally Significant Infrastructure Projects Revision A [EN010133/EX2/C8.1.8_A]. ES Chapter 14: Transport and Access [APP-049] concludes that there are not expected to be any significant residual effects in relation to Transport and Access as a result of the construction of the Scheme. Construction traffic impacts will be managed through the Construction Traffic Management Plan [C6.3.14.2_B] which is secured through requirement 15 of the DCO.
WLDC 23.6 WLDC 23.7 WLDC 23.8	<p>WLDC summarises on Alternatives and Design Evolution:</p> <p><i>"The Applicant has set out their approach to identifying alternative sites and the design approach that was taken during to production of the application.</i></p> <p><i>The Applicant has used a 20km radius from the point of connection at the Cottam power station. This is more than double the size of the search area used by Gate Burton and is 33% larger than the search area used by West Burton.</i></p> <p><i>It has been set out that a minimum of 40 hectares is required for a site to be economically viable. This site seems arbitrary and a similar site parameters were not applied to the Gate Burton scheme."</i></p>	<p>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 Point of Connection (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, as different developers require different economic parameters.</p> <p>Paragraphs 2.1.18 to 2.1.22 of the Site Selection Assessment [APP-067] explain the Applicant's approach to site size and land assembly at the site selection stage. Large areas of land are required for large scale solar development as they have less vegetation to be removed for easy installation of the solar infrastructure. This also reduces the amount of buffering required for tree root protection, avoidance of shading compared to small fields. 40ha is considered to be the minimum site size threshold considered by the Applicant to be viable (based upon the balance of costs of connecting infrastructure between individual sites and electricity losses from the multiple connection cabling necessary) to form part of a network of sites in close proximity.</p>
Climate Change		
WLDC 13.1	<p>WLDC raise the following points arising from the review of the Climate Change chapter of the ES:</p> <ol style="list-style-type: none"> <i>"ES states beneficial is significant given the reduction in Green House Gas (GHG) Emissions.</i> <i>The ES states no residual effects during construction, but the ES does demonstrate that there is a significant amount of embodied carbon in all phases of the scheme, i.e.</i> 	The Applicant's position aligns with WLDC's comments.

LIR Ref.	Summary	Applicant's Response
	<i>construction, operation and decommissioning. This must be given weight in the decision making process."</i>	
WLDC 13.16 WLDC 13.17	WLDC has identified no positive and no neutral impacts during construction.	The Applicant's position aligns with WLDC's comments.
WLDC 13.18	WLDC identify the following negative impact during construction: 1. <i>"As set out in Volume 1, Chapter 7: Climate Change [EN010133/APP/C6.2.7], the ES identifies the greatest impact of GHGs is the result of embodied carbon in the materials used for construction. Of these, the manufacture and supply of PV panels and batteries will be the largest source of GHG emissions. The worst case (Option B) total GHG emissions from the construction phase are estimated to equate to around 444,475 tCO2e. When annualised, the total annual construction emissions equate to around 222, 237 tCO2e. GHG emissions from the construction of the Scheme are considered to have a minor adverse effect on the climate (a negligible significant effect is not possible where any GHG emissions are released to the atmosphere). The overall effect on GHGs from construction is considered not significant in EIA terms."</i>	The Applicant's position aligns with WLDC's comments.
WLDC 13.19 WLDC 13.20	WLDC identify the following positive impact during operation: <i>"The ES concludes that overall, the Scheme will provide a major beneficial effect on the climate and a net reduction in GHG emissions over the lifetime of the Scheme. Over the estimated 40 year lifespan there would be a reduction of 5,973,729 tCO2e from the Scheme compared to the scenario where the Scheme does not go ahead."</i> WLDC has identified no neutral impacts during operation:	The Applicant's position aligns with WLDC's comments.
WLDC 13.21	WLDC identify the following negative impact during operation: 1. <i>GHG emissions will be generated as a result of operational activities such as the transportation of operational workers to and from the Site, water consumption and replacement of on-site materials. The production of replacement batteries at the midpoint of the project's lifespan is the greatest contribution to GHG emissions during the operational stage, estimated to equate to around 277,300 tCO2e in the worst case (Option B). This accounts for 89% of the total operational emissions. Despite this, it is anticipated that the magnitude of effect is likely to be low.</i>	The Applicant's position aligns with WLDC's comments.
WLDC 13.22 WLDC 13.23	WLDC has identified no positive and no neutral impacts during decommissioning.	The Applicant's position aligns with WLDC's comments.
WLDC 13.24	WLDC identify the following negative impact during decommissioning: <i>"Despite the ES not identifying any significant residual effects on climate change during decommissioning, the ES also admits a 'there is uncertainty over the total estimate of GHG emissions that will be produced' during this stage. The SoS is therefore minded to keep this in mind during their assessment of the Scheme. Whilst a calculation of 25,074 tCO2e has been provided, there is a possibility that the emissions could be higher. It is expected that emissions of GHGs will be far lower than construction and that the main source of emissions from this stage will be from worker transportation. It is expected that the magnitude of effect will be low</i>	The Applicant's position aligns with WLDC's comments.

LIR Ref.	Summary	Applicant's Response
	<i>and therefore the decommissioning stage will result in only minor adverse effects which is not significant in terms of EIA."</i>	
WLDC 13.25	<i>"The cumulative effect of other solar projects (West Burton, Gate Burton, Tillbridge) will also be beneficial in terms of climate change resilience given that the combined effect of the renewable energy will serve to counter the effects of climate change."</i>	The Applicant's position aligns with WLDC's comments.
WLDC 21.10	<p>WLDC identifies the following neutral impact:</p> <p><i>"The review of climate change resilience set out in ES Chapter 7: Climate Change [EN010133/APP/C6.2.7] identifies that the impacts of increased rainfall events, winter precipitation, and increased probability of extreme weather events on the Scheme's construction is anticipated to be medium to high magnitude. However, given the timescale of construction, it is not anticipated these events will be significantly more likely than the baseline, and as such, the anticipated impacts are not severe and are not significant. These impacts are likely to be of a greater (high) magnitude during operation and decommissioning as a result of future baseline conditions. That notwithstanding, the level of effect to the Scheme identified as not significant."</i></p>	The Applicant's position aligns with WLDC's comments.
Cultural Heritage		
LCC 12.5 LCC 12.6 LCC 12.7 LCC 12.8	<p>LCC concludes with regard to the level of pre-determination evaluation:</p> <ol style="list-style-type: none"> <i>"The Council is concerned about the approach taken on evaluation and conclusions made with regard to the impacts of this proposal on cultural heritage assets within Lincolnshire. The Council has consistently advised the Applicant that there must be enough pre-determination evaluation undertaken to determine the impact of the development upon potential archaeology and enough assessment undertaken to understand the impact on settings of heritage assets and the historic landscape.</i> <i>Throughout the pre-application stage (i.e. including the Scoping and PEIR stages) the Council has advised on detailed specific requirements for this proposed development and the need to provide a sufficient evidence base to allow for sufficient understanding of the site specific archaeological potential and in order to enable a mitigation strategy to be produced which is reasonable, appropriate and fit for purpose.</i> <i>The Council is concerned by the lack of evaluation trial trenching in 'blank' areas where previous archaeological evaluation techniques have not identified archaeological potential. An appropriate fit for purpose mitigation strategy cannot be achieved in areas that have not been subject to evaluation trial trenching.</i> <i>The issue of insufficient trenching evaluation has also been highlighted in discussions with the developer where Historic England stated that the areas not subjected to evaluation trial trenching appeared to be quite large and so the project contained a high level of risk."</i> 	<p>The Applicant respectfully disagrees with Lincolnshire Historic Place Team (LHPT) and considers that sufficient evaluation, proportionate to the stage at which the Scheme is at, has been undertaken to inform the DCO Application and any works required as part of a post-consent C6.3.13.7 ES Appendix 13.7 Archaeological Mitigation Written Scheme of Investigation (WSI) [APP-131] as secured by Requirement 12 of Schedule 2 in C3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C].</p> <p>The Applicant considers that they have taken a reasonable, proportionate and consistent approach 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].</p> <p>In the first instance the archaeological assessment comprised: C6.3.13.1 ES Appendix 13.1 Archaeological Desk-Based Assessments [APP-109], C6.3.13.2 ES Appendix 13.2 Archaeological Geophysical Survey Reports [APP-110 to APP-122], C6.3.13.3 ES Appendix 13.3 Geoarchaeological Desk-based Assessment (DBA) [APP-123] and C6.3.13.4 ES Appendix 13.4 Air Photo (AP) and LiDAR Reports [APP-124], which successfully identified the absence/ presence/ extent of archaeological sites within the Order limits of the Scheme. An informed programme of C6.3.13.6 ES Appendix 13.6 Archaeological Evaluation Trenching [APP-129 & APP-130] both verified the results of the non-intrusive assessments, and where archaeological deposits had been identified, provided further information regarding their extent, character, preservation, and archaeological significance.</p> <p>The Applicant considers that this approach has provided a sufficient level of baseline Information, as captured within Section 13.5 of C6.2.13 ES Chapter 13 Cultural Heritage [APP-048], on which the Examining Authority can issue a recommendation and the Secretary of State can determine the DCO Application, allowing for suitable archaeological mitigation to be carried out pursuant to the implementation of C6.3.13.7 ES Appendix 13.7 Archaeological Mitigation WSI [APP-131] which is secured by Requirement 12 of Schedule 2 to C3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C].</p> <p>The Applicant agrees that in a meeting on the 22/03/2023, Historic England "expressed concern over absorption of a high level of risk through not evaluating 'blank' areas". Historic England also stated that they believed that "...a</p>

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		<p>middle ground could be achieved to proportionately manage risk" and that "whilst it would be preferable to address additional trenching pre-consent, a phase of additional conditioned trenching post-consent (but as far ahead of construction as possible) would be a the next-best option to de-risk 'blank' areas".</p>
<p>LCC 12.9 LCC 12.10</p>	<p><i>"Sufficient pre-determination evaluation is required and has been a principle of the archaeological process since Planning Policy Guidance 16: Archaeology and Planning was published, and in accordance with current policy guidance the Council can only agree proposed mitigation in areas where sufficient evaluation trial trenching has been undertaken. During the evaluation phase trench plans were agreed with the Council for individual fields, however an overall evaluation plan of the entire redline boundary was not forthcoming, despite repeated requests including post submission of the application.</i></p> <p><i>The applicant has consistently agreed to provide this information, but failed to do so in a timely manner. This piecemeal reactive approach has been a major concern regarding adequate trenching cover across the site. It has become clear that 2% trenching has taken place only in certain parts of the redline boundary totalling 17.5% of the site. Despite this the submitted documents present the Cultural Heritage Chapter as completely assessed and evaluated with a full and complete understanding of the archaeological resource across the site. This is not the case. Only 440 trenches across the 1267ha of the order limits have been undertaken. This means that only 17.5% of the redline boundary area has been sufficiently evaluated. Informed appropriate mitigation measures therefore cannot exist for over 80% of the site. The submitted documents are therefore not fit for purpose nor are they in accordance with professional standards."</i></p>	<p>The Applicant respectfully disagrees with Lincolnshire Historic Place Team (LHPT) and considers that sufficient evaluation, which is proportionate and in scope for the stage at which the Scheme has reached, has been undertaken to inform the DCO Application. The evaluation works are also sufficient to inform any required post-consent works as detailed and secured through C6.3.13.7 ES Appendix 13.7 Archaeological Mitigation WSI [APP-131], which is secured by Requirement 12 of Schedule 2 to C3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C].</p> <p>The Applicant considers that they have taken a reasonable, proportionate and consistent approach supported by national and local guidance and best practice, which 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]</p> <p>In a meeting between the Applicant, LHPT and the Planning Inspectorate on the 09.06.2022, all parties agreed a staged approach to trenching, commencing on sensitive locations identified by the geophysical survey (Appendix 1, Table 3.1 of this Document & C6.3.13.9 ES Appendix 13.9 Consultation Response Tables [APP-133].</p> <p>The location of trenches was informed by C6.3.13.1 ES Appendix 13.1 Archaeological Desk-Based Assessments [APP-109]-- including Portable Antiquities Scheme (PAS), Historic Landscape Characterisation (HLC), National Record of Historic Environment (NRHE), National Heritage List for England (NHLE), National Mapping Programme (NMP) and Historic Environment Record (HER) data and historic map regression-- C6.3.13.2 ES Appendix 13.2 Archaeological Geophysical Survey [APP-110 to APP-122], C6.3.13.3 ES Appendix 13.3 Geoarchaeological Desk-Based Assessment [APP-123] and C6.3.13.4 ES Appendix 13.4 Air Photo (AP) and LiDAR Reports [APP-124], as well as with consideration to walkover surveys and topographic variations.</p> <p>An overall plan of the Order Limits was submitted to LHPT as part of the Written Scheme of Investigation (WSI) for the evaluation trial trenching on 03.05.2022 and 10.06.2022. Individual trench plans were provided to LHPT as produced, and changes were made to the location of trenches as requested by LHPT. Additional trenches, at the Applicant's request, were agreed with LHPT in Cottam 1 Parcel G aimed at better characterising geophysical anomalies. As requested by LHPT in an email dated 03.03.2023, an overall plan of the Order Limits showing the location of evaluation trenches, as mitigation areas was issued to LHPT on the 06.03.2023.</p> <p>The Applicant considers that the phased approach has enabled a pragmatic and responsive mechanism to deliver an informed programme of trenching, which has provided a sufficient level of baseline information, as captured within Section 13.5 of C6.2.13 ES Chapter 13 Cultural Heritage [APP-048], on which the Examining Authority can issue a recommendation and the Secretary of State can determine the DCO Application, and formulate an appropriate archaeological mitigation strategy.</p>
<p>LCC 12.11 LCC 12.12</p>	<p><i>"As well as completely inadequate evaluation, the proposed mitigation shows little attempt at reasonable measures which adequately deal with development impact. Their 'Preservation in situ' section 7.1.8 to 7.1.11 of Appendix 13.7: Written Scheme of Investigation for Archaeological Mitigation states they will use concrete ground anchors. This proposed mitigation is entirely inappropriate and unacceptable for unevaluated areas as it would cause any surviving archaeology, especially in areas of shallow deposits which encompasses much of this agricultural landscape, to be damaged or destroyed without investigation and without</i></p>	<p>The Applicant considers that, in accordance with the Central Lincolnshire Local Plan (Paragraph 10.0.16, and Policy S57) and the Overarching National Policy Statement for Energy (EN-1) (revised March 2023; Paragraph 5.9.26), there should be a preference to preserving archaeological remains. As identified in the National Policy Statement for Renewable Energy Infrastructure (EN-3) (March 2023; Paragraph 3.10.101) as a potential benefit of solar PV developments, the Applicant would like to highlight the positive effect the Scheme will have on the archaeological features identified within the Scheme's Order Limits, which are currently at risk from the impacts of ploughing (Paragraphs 13.7.15, 13.7.33 and 13.7.34 of C6.2.13 ES Chapter 13 Cultural Heritage [APP-048]). Consequently, where appropriate the Applicant has proposed "preservation in-situ" either in the form of 'no development' areas,</p>

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	<p>recording. For example on this scheme previously unexpected human remains were found in the first few days of trenching at a depth of 20cm below the ground surface.”</p> <p>“There would be compaction when the ground anchors are installed, settling and readjustment during the decades of operational life and ground disturbance when the ground anchors are ripped out in decommissioning as the land will need to be restored ‘to its preconstruction condition at the end of the operation.’ (C7.2 Outline Decommissioning Statement section 2.1.1) There is no mention of archaeology in the Outline Decommissioning Statement including Table 3.1 Decommissioning Mitigation and Management Measures.”</p>	<p>non-intrusive concrete anchors or directional drilling (along the cable route), to minimise harm to buried archaeological remains and where possible allow the archaeological resource within the site to be conserved in-situ.</p> <p>Concrete anchors are a nationally recognised method for archaeological mitigation by design. This is demonstrated by guidance provided by Cornwall Council¹ (), and the numerous examples of solar schemes where local planning authorities have agreed the use of concrete anchors to safeguard buried archaeological remains. Examples of schemes where concrete feet have been considered appropriate mitigation include The Grange (19/01408/FULM) in Nottinghamshire, Land south-east Of A6108 Darlington Road (21/00931/FULL) in North Yorkshire, Eastfield Farm (19/04321/STPLF) in East Riding of Yorkshire, Conesby Solar Park (PA/2018/2140) in North Lincolnshire, Vine Farm, Shingay-cum-Wendy (S/1067/14/FL) in Cambridgeshire.</p> <p>As detailed in C6.3.13.7 ES Appendix 13.7 Archaeological Mitigation WSI [APP-131], all areas recommended by the Applicant for archaeological mitigation using concrete anchors have been subject to field evaluation using geophysical survey and trial trenching.</p> <p>The burials identified in Field G4 are located adjacent to contemporaneous ditches that were recorded by the geophysical survey, and so archaeological features in this area were not unexpected. The burials were located at depths of between 30 and 40cm and had been heavily disturbed by plough damage. Consequently, the Scheme provides a mechanism to record and preserve the inhumations prior to their further impact by agricultural activity. As detailed in Table 6.1.1 of C6.3.13.7 ES Appendix 13.7 Archaeological Mitigation WSI [APP-131], the Applicant has proposed this area for open excavation, not concrete feet.</p> <p>As stated in Paragraph 13.7.47 C6.2.13 ES Chapter 13 Cultural Heritage [APP-048], a Decommissioning Environmental Management Plan will be prepared prior to decommissioning and approved by the relevant planning authorities. This is secured by Requirement 12 of Schedule 2 to C3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C].</p>
LCC 12.13	<p>“Looking through the submission documents there are also extensive further ground impacts from other proposed mitigations such as wildlife ponds, woodland and shelterbelt planting, and bird habitat scrapes up to 0.5m deep. All these proposed mitigations have significant below ground impacts yet the potential impact on surviving archaeological remains is not known, and again no archaeological mitigation is proposed.”</p>	<p>Where the evaluation has identified a potential for archaeological remains to be present mitigation in the form of ‘strip, map and record’ has been proposed. Where non-intrusive survey and assessment, for example geophysical survey and evaluation trenching, has not identified archaeological remains, the Applicant considers that no archaeological mitigation is required (C6.3.13.7 ES Appendix 13.7 Archaeological Mitigation WSI [APP-131]).</p> <p>If further archaeological mitigation is required in advance of the implementation of specific landscape and ecological mitigation, the Applicant considered an archaeological watching brief during topsoil stripping as part of the construction process would be sufficient mitigation (C6.3.13.7 ES Appendix 13.7 Archaeological Mitigation WSI [APP-131]).</p>
LCC 12.14 LCC 12.15 LCC 12.16	<p>LCC concludes:</p> <ol style="list-style-type: none"> 1. “The applicant has failed to provide a reasonable baseline assessment of the archaeological resource and the development’s impact upon it. This is contrary to relevant guidance and policy and to professional standards and it means that at this stage any proposed mitigation is uninformed and therefore cannot be fit for purpose. Further archaeological evaluation within the red line boundary and the full cable route is necessary to understand the extent, nature and significance of surviving archaeology so that appropriate mitigation can be determined. 	<p>The Applicant respectfully disagrees that baseline evidence is ‘woefully inadequate’ and considers appropriate mitigation can be determined for areas outside of trenched areas.</p> <p>The Applicant considers that the phased programme of archaeological evaluation was completed to a high standard in line with National and Local guidance and has produced high quality data that has sufficiently informed the Environmental Statement submitted as part of the DCO Application, and the need for any pre-construction archaeological works.</p> <p>The first phase of assessment and field evaluation comprising: C6.3.13.1 ES Appendix 13.1 Archaeological Desk-Based Assessments [APP-109], C6.3.13.3 ES Appendix 13.3 Geoarchaeological Desk-Based Assessment [APP-123] and C6.3.13.4 ES Appendix 13.4 Air Photo (AP) and LiDAR Reports [APP-124] and C6.3.13.2 ES Appendix</p>

¹ https://files.bregroup.com/solar/KN5524_Planning_Guidance_reduced.pdf, P.13

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	<p>2. <i>In summary it is the Councils view that the approach taken has been woefully inadequate and the submission does not meet the evidential requirements as set out in the relevant policy and guidance including Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (Regulation 5 (2d)), the National Planning Policy Framework and the National Planning Statement Policy EN1 (Section 5.8) which states "The applicant should ensure that the extent of the impact of the proposed development on the significance of any heritage assets affected can be adequately understood from the application and supporting documents (5.8.10)."</i></p> <p>3. <i>From the above it is clear that there is considered uncertainty of the extent of buried heritage assets due to the inadequate amount of trial trenching undertaken there is a real possibility that remains of more than local/regional/ significance could be disturbed. With this uncertainty it is assessed that moderate harm arises as it is not yet possible to assign categorically impact significance within the Order limits. There is therefore a negative construction impact upon the archaeological remains in relation to the Order limits with the degree of harm as yet unquantifiable due to the insufficient evaluation undertaken so far."</i></p>	<p>13.2 Archaeological Geophysical Survey [APP-110 to APP-122] successfully identified numerous previously unrecorded sites. In particular, the geophysical survey, which was undertaken across all accessible areas within the Scheme, identified numerous concentrations of archaeological deposits.</p> <p>Geophysical survey is an internationally recognised evaluation methodology for identifying the absence/presence of buried archaeological remains. The Chartered Institute for Archaeology (Cifa) Standards and Guidance for Field Evaluation (2020) defines a field evaluation as "a limited programme of non-intrusive and/or intrusive fieldwork which determines the presence or absence of archaeological features, structures, deposits, artefacts or ecofacts and their research potential, within a specified area or site on land".</p> <p>There are numerous examples of geophysical survey being used as an evaluation technique either in isolation or with a low sample of targeted evaluation trial trenching to evaluate the archaeological potential of land within solar schemes in the east and north-east of England. Examples of solar schemes approved in the last five years include: Land south-east Of A6108 Darlington Road (21/00931/FULL) in North Yorkshire, Conesby House Farm (PA/2018/2140) in North Lincolnshire, Eastfield Farm (19/04321/STPLF) in East Riding of Yorkshire, Chestnut Farm (P/21/2661/2) in Leicestershire and Vine Farm (S/1067/14/FL) in Cambridgeshire).</p> <p>The results of C6.3.13.2 ES Appendix 13.2 Archaeological Geophysical Survey Reports [APP-110 to APP-122] for the Scheme were verified by a programme of evaluation trial trenching, which targeted both concentrations of geophysical anomalies interpreted as being of an archaeological origin and 'blank' areas where no archaeological anomalies were identified. Where archaeological features were encountered there was an excellent correlation between the results of the geophysical survey and trial trenching, and the trial trench evaluation was sufficient to enhance information regarding the extent, character, preservation and significance of the archaeological features. Likewise, no significant archaeological features were identified in any of the 'blank' areas that were tested. Consequently, the Applicant considers that there is no evidence to suggest undetected archaeological remains of more than local or regional significance are located within the Order Limits, and that there is not uncertainty regarding the extent of buried heritage assets within the Scheme's Order Limits.</p> <p>The combined programme of non-intrusive and intrusive evaluation is considered by the Applicant to have met the objectives of a field evaluation as set out by Cifa (2020) and so is sufficient to inform the DCO Application. Any further archaeological works required will be carried out pursuant to the implementation of C6.3.13.7 ES Appendix 13.7 Archaeological Mitigation WSI [APP-131] which is secured by Requirement 12 of Schedule 2 to C3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C].</p>
NCC 2.71	<p><i>"In terms of archaeology the part of the scheme which affects Nottinghamshire is the route of the cable trench and some ancillary works. The investigation of archaeological potential and subsequent mitigation proposals for the scheme have been devised by the archaeological consultants for the Gate Burton scheme, rather than for the Cottam proposal. It is understood that a number of schemes currently share the same cable run. NCC understand that the archaeological mitigation work proposed is of a good standard. By contrast, NCC see from the archaeological reports relating specifically to most of Cottam sites 1,2, and 3, that the applicants are proposing to mitigate impacts from their scheme on the archaeological remains they have demonstrated are present, "as necessary", which seems vague and ill-defined."</i></p>	<p>The Applicant respectfully disagrees with the comment that <i>"the investigation of archaeological potential and subsequent mitigation proposals for the scheme have been devised by the archaeological consultants for the Gate Burton scheme"</i>. The Gate Burton, Cottam and West Burton Schemes successfully worked together in producing strategies for evaluation and mitigation phases. The Applicant highlights that the Cottam Scheme's mitigation strategy was drafted prior to that of the Gate Burton Scheme's, as demonstrated by C6.3.13.7 ES Appendix 13.7 Archaeological Mitigation WSI [APP-131], which was drafted in December 2022, as opposed to the Gate Burton Energy Park Archaeological Mitigation Strategy, which was drafted in January 2023 (EN010131/APP-227).</p> <p>The Applicant highlights that the difference in approach to evaluation trial trenching of 'blank' areas between the Shared Cable Route Corridor and other areas of the Scheme reflects the high level of impact that would be caused to the archaeological record as a result of the proposed development, sensitivity for archaeological remains in land adjacent to the Trent Valley, with consideration to the potential for alluvium and presence of paleoenvironmental deposits, as well as the heightened potential for archaeological features as evidenced by baseline information. The applicant would also highlight the effectiveness of the different evaluation techniques used for the Shared Cable Route Corridor. No additional significant archaeological features were identified solely by evaluation trial trenching. Conversely, non-intrusive survey techniques identified several anomalies and cropmarks of a likely</p>

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		archaeological origin that were not identified by trial trench evaluation (for example in Mitigation Area CRC/12 as detailed in of C6.3.13.7 ES Appendix 13.7 Archaeological Mitigation WSI [APP-131]).
WLDC 11.1	<p>WLDC raise the following points arising from the review of the Cultural Heritage chapter of the ES:</p> <ol style="list-style-type: none"> 3. There will be a several significant impacts on designated heritage assets including Scheduled Monuments and Grade I listed buildings which are detailed below. This will have a long term impact on these local assets. 4. Although some of the impacts on heritage assets are considered not significant, there a multiple slight adverse impacts which, in accordance with section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, and when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. 	<p>The Applicant notes these comments and notes that, with the proposed mitigation in place, 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, <i>Thorpe medieval settlement</i> (NHLE 1016978).</p> <p>No likely significant effects identified at any other Scheduled Monuments as detailed in Table 23.1 of C6.2.23_A ES Chapter 23_Summary of Significant Effects Revision A [EN010133/EX2/C6.2.23_A].</p>
WLDC 11.6	WLDC has identified no positive impacts during construction.	The Applicant notes this comment.
WLDC 11.7 WLDC 11.8 WLDC 11.9 WLDC 11.10 WLDC 11.11 WLDC 11.12	<p>WLDC identify the following negative impacts during construction:</p> <ol style="list-style-type: none"> 2. <i>There is the potential for there to be Slight Adverse effects at five Scheduled Monuments, and up to Moderate Adverse effects at one Scheduled Monument (Thorpe medieval settlement – NHLE 1016978). This latter impact could result in 'significant' effects in EIA terms, and although impacts resulting from the construction phase are medium term and reversable, the visual impacts of the constructed Scheme would continue into and throughout the operational phase. There is also the potential for Large Adverse effects upon the Site of a college and Benedictine Abbey, St Mary's Church, Stow (NHLE 1012976) which would also be a 'significant' effect, should this occur.</i> 3. <i>Most of the identified impacts to archaeological remains are 'not significant' in EIA terms, with effects mostly ranging between Negligible and Slight Adverse. However, as noted above there is the potential along the Shared Cable Corridor for up to Moderate Adverse impacts to what are likely to be regionally important remains of Medium value to occur, which could potentially result in 'significant' effects (i.e. at AR67-75). However, these impacts are not fully understood at present as the full results of the archaeological evaluations recently undertaken along the Shared Cable Corridor are not yet available, nor has the precise design for the cable route and associated temporary infrastructure been finalised.</i> 4. <i>There could also be up to Large Adverse effects upon a kiln of possible Iron Age/Romano-British date at AR22a which would be fully excavated ahead of the construction of the battery storage area at the Cottam 1 Site. However, the significance of effects for this asset are uncertain as the features identified here during the evaluation are undated and only tentatively interpreted as a kiln, and therefore the value (and hence significance of effects) might be of a lesser magnitude.</i> 5. <i>It is predicted that there would be Negligible Adverse impacts at three Grade II Listed Buildings and Minor Adverse impacts at one Grade II Listed Building and two Grade II* Listed Buildings, in each case resulting in Slight Adverse effects.</i> 	<p>These comments largely reflect the Applicant's position, although regarding the comment <i>'There is also the potential for Large Adverse effects upon the Site of a college and Benedictine Abbey, St Mary's Church, Stow (NHLE 1012976) which would also be a 'significant' effect, should this occur'</i>, it should be noted that paragraph 13.8.5 of C6.2.13 ES Chapter 13 Cultural Heritage [APP-048] sets out the proposed mitigation measures which would prevent this potential impact from occurring. It should also be noted that since the production of C6.2.13 ES Chapter 13 Cultural Heritage [APP-048], the full results of the archaeological evaluations undertaken along the Shared Cable Corridor have become available, and these have confirmed the interim results provided in C6.3.13.6.4 (Shared Grid Connection Corridor Nottinghamshire and Lincolnshire Archaeological Evaluation Interim Report) [APP-130].</p>

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	<p>6. <i>There would be additional visual impacts during the construction phase along the cable route corridor, which would be visible within the settings of two Grade II Listed Buildings: Signal Box at Stow Park Station (NHLE 1146606) and Stow Park Station (NHLE 1064058).</i></p> <p>7. <i>The visual impact of the construction traffic, temporary compounds and haul roads, along with the increasing visibility of the solar arrays as they are constructed at a minimum of 1.9km distant from the western edge of the Registered Park and Garden, and moreover, taking account of the layering effect that would occur in a relatively flat landscape, this would have a very low-level industrialising effect upon the rural character of part of the distant Trent valley landscape. It is considered that this would result in Minor Adverse impacts which for an asset of Medium value would result in Slight Adverse effects."</i></p>	
<p>WLDC 11.13</p>	<p>WLDC identify the following positive impact during operation: <i>"The impacts to buried archaeological features during the operational phase would be of a largely beneficial nature, due to these remains being taken out of the agricultural cycle of regular ploughing which most of the field parcels within the Order Limits are currently subject to."</i></p> <p>WLDC identify the following neutral impact during operation: <i>"At 15 of the Scheduled Monuments, the assessment concluded that it was unlikely that any visibility of the Scheme would be possible."</i></p>	<p>The Applicant notes that these comments reflect the assessment provided in C6.2.13 ES Chapter 13 Cultural Heritage [APP-048].</p>
<p>WLDC 11.14 WLDC 11.15 WLDC 11.16 WLDC 11.17 WLDC 11.18</p>	<p>WLDC identify the following negative impacts during operation:</p> <p>2. <i>At five of the Scheduled Monuments, potential visibility of elements of the Scheme was identified, but in general this would be restricted to slight glimpses contained within narrow arcs of view and/or at such a distance that this would be barely perceptible. Consequently, these would result in changes of Negligible Adverse magnitude to the significance of these heritage assets, resulting in, at worst, Slight Adverse effects. At Thorpe Medieval Settlement (NHLE 1016978), however, the close proximity of the Scheme would result in much greater visual impact, this being across a wide arc of view dominated by an element of the historic landscape that contributes to the significance of the Scheduled Monument and allows its significance to be appreciated. These considerable changes to the setting would result in what are considered to be Moderate Adverse impacts to the significance of the heritage asset. The significance of effects matrix indicates that this should be scored as either Moderate or Large Adverse effects. However, as the field parcel to the north only possesses a slight legibility of the medieval field system, in this case two field boundaries reflecting the likely edges of former strips field reflecting the medieval agricultural practices (or possibly a furlong, though this cannot be proven), professional judgement suggests the effects would be of Moderate Adverse significance, which are nevertheless considered 'significant' in terms of the ES assessment.</i></p> <p>3. <i>During the operational phase of the Scheme, there would be impacts to five Grade II Listed Buildings and two Grade II* Listed Buildings, all of which are considered to be impacts of Slight Adverse magnitude.</i></p>	<p>The Applicant notes that these comments reflect the assessment provided in C6.2.13 ES Chapter 13 Cultural Heritage [APP-048].</p>

LIR Ref.	Summary	Applicant's Response
	<p>4. For Glentworth Hall and Fillingham Castle the significance of effects matrix indicates that these effects should be scored as either Slight or Moderate Adverse, and the lower of these scores was decided upon since the visibility of the Scheme would be of a limited nature considering the distances involved. Similarly, for Thorpe in the Fallows Farmhouse, Mount Pleasant Farmhouse and Corringham Windmill, the significance of effects matrix indicates that these effects should be scored as either Neutral or Slight Adverse, and the higher score was chosen to help highlight where mitigation measures could reduce or remove the adverse effects through effective screening.</p> <p>5. For most of the non-designated historic buildings assessed, the effects would be either Neutral or Slight Adverse effects, i.e., 'not significant', but at Turpin Farm (HB11), Corringham Grange Farm (HB18) and Blyton Grange Farm (HB22), the Major Adverse impacts would result in 'significant' Moderate Adverse effects in the absence of additional mitigation.</p> <p>6. The Heritage Statement provides an assessment of potential impacts of the Scheme at the Fillingham Castle Grade II Registered Park and Garden (NHLE 1000977). The visual impacts can be characterised as 'Slight changes to setting, resulting in a loss of significance or its enhancement', and therefore impacts of a Minor Adverse magnitude. For a Grade I Listed Building of High value, this would result in effects of Slight or Moderate Adverse significance in terms of the scoring methodology adopted by the ES, and for the Grade II Registered Park and Garden, which is of Medium value.</p>	
WLDC 11.19	<p>"Decommissioning is expected to take between 12 and 24 months and will be undertaken in phases, and for the purposes of the assessment is expected to occur no earlier than 40 years after the commencement of operation of the Scheme. The decommissioning phase would require plant movement and other activities similar to those employed during the construction phase, which could have an adverse impact upon the settings of nearby heritage assets. The ES assesses that the impact would be neutral as the impacts are no greater than during the operational phase, and would be temporary, short term and reversible in nature."</p>	The Applicant notes that these comments reflect the assessment provided in C6.2.13 ES Chapter 13 Cultural Heritage [APP-048].
WLDC 11.20	<p>The only 'significant' effect identified due to impacts to the setting of a designated heritage asset is at the Thorpe medieval settlement Scheduled Monument (NHLE 1016978), this being due to the close proximity of elements of the Cottam 1 Site.</p>	The Applicant notes that these comments reflect the assessment provided in C6.2.13 ES Chapter 13 Cultural Heritage [APP-048].
<p>WLDC 11.21 WLDC 11.22 WLDC 11.23 WLDC 11.24</p>	<p>WLDC identify the following negative cumulative impacts during operation:</p> <p>"Slight Adverse effects (i.e., effects that are 'not significant') have been identified at the following Scheduled Monuments for the Scheme:</p> <ul style="list-style-type: none"> • Deserted village of Dunstall (NHLE 1004996); • Roman villa west of Scampton Cliff Farm (NHLE 1005041); • Southorpe medieval settlement (NHLE 1016794); • Gilby medieval settlement (NHLE 1016795); and • Coates medieval settlement and moated site (NHLE 1016979). <p>Slight Adverse effects (i.e., effects that are 'not significant') have also been identified at the following Listed Buildings for the Scheme:</p>	The Applicant notes that these comments reflect the assessment provided in C6.2.13 ES Chapter 13 Cultural Heritage [APP-048].

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	<ul style="list-style-type: none"> • <i>Fillingham Castle (NHLE 1166045);</i> • <i>Glentworth Hall (NHLE 1063348);</i> • <i>Former stables at Glentworth Hall (NHLE 1166094);</i> • <i>Thorpe in the Fallows Farmhouse (NHLE 1308921);</i> • <i>Mount Pleasant Farmhouse east of Laughton (NHLE 1317186); and</i> • <i>Corringham Windmill (NHLE 1359417).</i> <p><i>Slight Adverse effects (i.e., effects that are 'not significant') have also been identified at the following Registered Park and Garden for the Scheme:</i></p> <ul style="list-style-type: none"> • <i>Fillingham Castle (NHLE 1000977).</i> <p><i>It is considered that there could only be cumulative effects at those heritage assets identified above (in Paragraph 13.9.2 where views from the Lincoln Cliff contribute to the significance of the asset:</i></p> <p><i>Roman villa west of Scampton Cliff Farm (NHLE 1005041 Fillingham Castle (NHLE 1166045/NHLE 1000977);</i></p> <ul style="list-style-type: none"> • <i>Glentworth Hall (NHLE 1063348); and</i> • <i>Former stables at Glentworth Hall (NHLE 1166094)."</i> 	
WLDC Table 22-1	<ol style="list-style-type: none"> 1. <i>"Cumulatively, there is a significant impact to the setting of a designated heritage asset is at the Thorpe medieval settlement Scheduled Monument (NHLE 1016978), this being due to the close proximity of elements of the Cottam 1 Site.</i> 2. <i>There are also minor adverse effects on several designated and undesignated historic assets including scheduled monuments; listed buildings; registered parks and gardens; and views from the Lincoln Cliff. These are set out in the cultural heritage chapter.</i> 3. <i>The proposed Cottam Solar Project and West Burton Solar Project will contribute to the impact identified in this assessment on the Grade I listed Church of St Mary at Stow (1146624) through additional development within its wider landscape setting."</i> 	The Applicant notes this comment.
WLDC 23.19 WLDC 23.20	<p>WLDC summarises on Cultural Heritage:</p> <p><i>"The Scheme will have an impact on several designated and undesignated heritage assets. Although some of the affects are considered not significant, there a multiple slight adverse impacts which, when considering the impact of a proposed development on the significance 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."</i></p>	The Applicant notes this comment.
Cumulative Effects		
WLDC 22.1 WLDC 22.2 WLDC 22.3	<p>WLDC raise the following summary points in regard to cumulative effects:</p> <ol style="list-style-type: none"> 1. <i>"Unlike the ES for the Gate Burton scheme, which includes a 'Cumulative Effects and Interactions' chapter, there is not an individual cumulative effects chapter of the Cottam ES. Whilst it is noted that the cumulative effects are considered in each chapter,</i> 	<p>The Applicant responds with the following comments with regard to the comments on Cumulative Effects:</p> <ol style="list-style-type: none"> 1. The Applicant notes this comment, but considers that its approach to presenting the cumulative effects assessment is consistent with the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and the Planning Inspectorate's Advice Note 17: Cumulative effects assessment (version 2 published

LIR Ref.	Summary	Applicant's Response
WLDC 22.4 WLDC 22.5	<p><i>the presentation of the cumulative effects could have been made clearer by including an individual chapter.</i></p> <ol style="list-style-type: none"> 2. <i>The key impact on cumulative effects would be from the proposed Gate Burton, Tillbridge and West Burton solar farms that are located within West Lindsey alongside the Scheme.</i> 3. <i>There are several discrepancies between the Environmental Statements (ES) for Cottam and Gate Burton. This is particularly relevant to the cumulative effects assessments which state conflicting levels of impacts.</i> 4. <i>The Cottam ES states that there will be beneficial or neutral cumulative landscape impacts during the operational phase of the developments. This is in conflict with Chapter 10: Landscape and Visual Amenity of the Gate Burton ES (Doc Ref. EN010131/APP/3.1) which assesses adverse cumulative effects states:</i> <i>'10.12.6 During operation, cumulative effects from the Scheme and Cottam Solar Project or Tillbridge Solar Farm are considered Minor adverse. Cumulative effects with West Burton Solar Project are Moderate adverse which is considered significant.</i> <i>10.12.7 West Burton Solar Project, Cottam Solar Project, Tillbridge Solar Farm and the Scheme has as a combined cumulative impact on landscape of Moderate adverse, which is considered significant. Given the proximity of the Scheme with these other solar projects, and the combined scale, the Applicant has worked in partnership to identify areas where projects can collaborate to manage environmental effects.'</i> 5. <i>The cumulative landscape impact assessed in the landscape and visual assessment in contradiction of the findings in other chapters of the ES. This includes the socio-economic chapter which recognises the 'a long-term impact on the landscape character of some tourism and recreation receptors that are reliant on the landscape context for their value, such as viewpoints, landmarks, and cultural heritage assets.'</i> 	<p>August 2019). The Applicant also notes that, at Examination Deadline 1, the Applicant submitted C8.1.8 Joint Report on Interrelationships between Nationally Significant Infrastructure Projects [REP-054]. This includes a Review of Cumulative Effects at Appendix E which summarises the assessments of cumulative effects for each topic for the Scheme and presents them alongside the assessments for the three other nearby DCO applications, Gate Burton Energy Park, West Burton Solar Project and Tillbridge Solar Project. This Report was produced jointly by the applicants of all four schemes, at the request of the ExA.</p> <ol style="list-style-type: none"> 2. The Applicant agrees with this comment. 3. The assessments reported in the Environmental Statements for Cottam and Gate Burton have been undertaken independently. Appendix E of the updated C8.1.8_A Joint Report on Interrelationships between Nationally Significant Infrastructure Projects Revision A [EN010133/EX2/C8.1.8_A] summarises the respective findings. 4. The Environmental Impact Assessments for each of the schemes have been undertaken independently, and different impact assessments can reach different conclusions. C8.1.8_A Joint Report on Interrelationships between Nationally Significant Infrastructure Projects Revision A [EN010133/EX2/C8.1.8_A] includes a review of cumulative impacts at Appendix E, based on expert specific methodologies which reach conclusions that are unique to each topic. 5. The Applicant is confident that the findings of the C6.2.18 ES Chapter 18_Socio Economics Tourism and Recreation [APP-053] are not in contradiction to C6.2.8_A ES Chapter 8 Landscape and Visual Impact Assessment Revision A [EN010133/EX2/C6.2.8_A]. The Applicant seeks to clarify that the cumulative assessment of impact on regional and local attractions, including local landscape, heritage, and recreational attractions attributes is only in part reliant on the assessment outcome of the LVIA. It is furthermore reliant on assessment of cultural heritage impacts, and a qualitative assessment of the impact on the desirability of these receptors for tourists and visitors. The cumulative impacts assessment in Section 8.10 [EN010133/EX2/C6.2.8_A] states that the differences between the assessment of the Scheme in isolation versus cumulatively are very low in magnitude. Therefore, it stands that the significance of effect to tourism and recreation receptors reliant on landscape context for their desirability and use is unlikely to be greatly affected. Therefore, the assessment conclusion that there is no greater significance to impacts on these receptors (see para. 18.10.28, 18.10.52, and Table 18.29 in C6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-053]) is consistent with the assessment in the LVIA.
Ecology and Biodiversity		
BDC pg.14	<p>Local area characteristics such as urban and landscape qualities and nature conservation sites have been discussed in the above policy section. The examiner is requested to seek views from the statutory bodies including Notts County Council, Notts Wildlife Trust, Natural England and Environment Agency on these topic areas.</p> <p>The Council does not have in house professional expertise to comment on ecological designated sites and therefore advice should be taken from Nottinghamshire Wildlife Trust and Natural England.</p>	<p>The Applicant acknowledges this comment.</p>
NCC 2.70 NCC 2.78	<p>Local area characteristics such as urban and landscape qualities and nature conservation sites:</p>	<p>The Applicant acknowledges this comment.</p>

LIR Ref.	Summary	Applicant's Response
	<p>There are a number of local area sites, these have been identified in paragraphs 2.17-2.67. The Examiner is requested to seek views from the statutory bodies including Wildlife Trust, Natural England and Environment Agency on these topic areas.</p> <p>The County Council does not have professional in house expertise to comment on ecological designated sites and therefore advice should be taken from Nottinghamshire Wildlife Trust and Natural England.</p>	
<p>WLDC 8.1.1</p>	<p>WLDC raise the following points arising from the review of the Ecology and Biodiversity chapter of the ES:</p> <ol style="list-style-type: none"> 1. The assessment does not appear to include any consideration of combustion emissions from on-site plant or transport to the site. 2. Decommissioning of West Burton A (power station) has not been included in the ES cumulative assessment in Chapter 9 Section 9.9. 3. Chapter 9 paragraph 9.7.82 (and Table 9.3) a beneficial effect significant at a district level for grassland is welcome. However, it is unclear whether the information provided in this chapter or APP/C7.3: Landscape and Ecological Management Plan: Outline Plan contains sufficient secured detail to support this conclusion at this stage. 4. Chapter 9 para 9.9.19: '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.' This sentence is unclear, more description is required as to whether a cumulative significant effect could result. 5. 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 places these measures lack confirmed detail. 6. Overall the conclusions as presented in App/C7.20 - Information to Support a Habitat Regulations Assessment: Cottam Solar Project (the 'ISHRA') seem reasonable. However, the report lacks the detail and does not appear to follow a systematic approach to assessment so there is a possibility that some effect pathways have been overlooked. 7. Pins Advice Note 10: Habitats Regulation Assessment relevant to nationally significant infrastructure projects contains a list of information that Applicants should provide. There are elements missing from the Habitat Regulations Report submitted as part of this Scheme. 8. Decommissioning of West Burton A should also be included in the HRA in-combination assessment and considered in section 5. 9. ISHRA para 4.1.1 is misleading in respect to Ramsar sites. There is the potential for the Ramsar Sites to have been overlooked by this assessment. 10. 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 	<p>The Applicant responds to the following issues with regard to the Ecology and Biodiversity Assessment:</p> <ol style="list-style-type: none"> 1. 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 issue ID 3.18.1 of the EIA Scoping Opinion document [APP-064]). Furthermore, provisions contained within C7.1_B Outline Construction Environmental Management Plan Revision B [EN010133/EX2/C7.1_B] and C6.3.14.2_B ES Appendix 14.2 Construction Traffic Management Plan [EN010133/EX2/C6.3.14.2_B]) will manage construction effects on air quality to an acceptable level. 2. Plans and projects brought forward for consideration within our 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 Route Corridor between the last two 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. 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. 3. The conclusion of a beneficial effect on grassland, significant at a district level, is due to the large extent of newly created grassland to be managed and monitored over the lifetime of the scheme and based on the detail included in the C7.3_B Outline Landscape and Ecological Management Plan [EN010133/EX2/C7.3_B] (LEMP). This document 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. In accordance with Requirement 7 of Schedule 2 to C3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C], a detailed version of the LEMP must be approved by the relevant planning authority (or authorities), in consultation with the Environment Agency, 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. 4. The sentence in question describes how the duration of the Shared Cable Route installation could affect the duration of the temporary impacts upon the listed hedgerow/field margin species. In either case, no significant cumulative effect on these species is considered likely, however. This is demonstrated by the absence of such cumulative impacts identified in the ecology sections of C6.2.23_A ES Chapter 23_Summary of Significant Effects Revision A [EN010133/EX2/C6.2.23_A] and Appendix E of C8.1.8_A Joint Report on Interrelationships between Nationally Significant Infrastructure Projects Revision A [EN010133/EX2/C8.1.8_A]).

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	<p>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.</p> <p>11. 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. If the cable route were to take longer than 2 years then it is expected that the BNG calculations should be revisited.</p>	<p>5. The Outline LEMP is secured through Requirement 7 of Schedule 2 of C3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C]. If WLDC could provide any specific points of concern, the Applicant would then be able to consider these.</p> <p>6. 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 Scheme. If WLDC could provide any specific effect pathways that have been overlooked, the Applicant would be able to consider these.</p> <p>7. 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 Scheme, in accordance with PINS Advice Note 10. If there is any specific information that WLDC considers missing from the ISHRA, the Applicant asks WLDC to specify this so the Applicant can consider the assertion in more detail.</p> <p>8. For the same reasons as stated at Point 2 above, the decommissioning of West Burton A was not considered to lie within the Zone of Influence of the Scheme owing principally to the lack of significant, functionally linked habitats/ecological features between the Scheme and West Burton A. Furthermore, as it is concluded that significant cumulative effects from all considered projects upon the Humber Estuary SAC & SPA (and Ramsar site, see point 9 below) are not likely, there is therefore no significant cumulative effect likely to arise from the decommissioning of West Burton A in combination with the considered projects.</p> <p>9. 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 within the information to support a Habitat Regulations Assessment [APP-357].</p> <p>10. Please refer to document C8.1.8 Joint Report on Interrelationships between Nationally Significant Infrastructure Projects submitted for Deadline 1. This document updates the assessment of cumulative effects in the light of the publication of additional information relating to Gate Burton and Tillbridge Solar Projects.</p> <p>11. The 18 month construction programme used for the ES Chapter 9 assessment is inconsistent with the Scheme description and how the whole of the EIA was undertaken (see C6.2.4. ES Chapter 4 Scheme Description Revision A). This was chosen as the most appropriate timespan for the Scheme to be assessed in isolation from the projects considered in the cumulative effects assessment. A five year duration was used for the cumulative assessment of the construction impacts resulting from the Shared Cable Route Corridor as the maximum duration of a potential sequential cable construction programme for the respective projects</p>
WLDC 8.13	WLDC has identified no positive impacts during construction.	The Applicant acknowledges this comment.
WLDC 8.14 WLDC 8.15 WLDC 8.16 WLDC 8.17 WLDC 8.18	<p>WLDC identify the following neutral impacts during construction:</p> <p>7. <i>"The proposed development does not trigger any of Natural England's Impact Risk Zones for the SSSIs and, therefore, it is reasonable to assume that this is the case for the LWSs and LNR, in the absence of any formal risk zone given for them.</i></p> <p>8. <i>None of the habitats for which the species the designated sites are notified are present within Cottam 3a or 3b, such as heathland, woodland or acid grassland supporting</i></p>	The Applicant notes that these comments reflect the assessment provided in C6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-044].

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	<p><i>woodlark and nightjar. The absence of strong habitat corridors between the designated sites and Cottam 3a or 3b also reduces the likelihood that any of the reptiles or invertebrate species listed under the designations would rely on or disperse onto/via the Scheme.</i></p> <p>9. <i>These reasons, in conjunction with the nature of the development, being self-contained and largely passive for its duration, means it is unlikely that any impacts on the designated sites will arise.</i></p> <p>10. <i>No direct loss of woodland is anticipated in relation to the array Site construction, as all access and construction activity will avoid the few woodland habitats which occur adjacent to them.</i></p> <p>11. <i>The potential for loss of hedgerows and trees to the construction of the array Sites is very limited as the design process has continuously sought to refine down the number of new crossings or gaps required in existing field boundaries. A totals 12 new hedgerow gaps, with 10 associated ditch crossings. These gaps will measure between 3-6.5m wide. In the context of the Scheme's hedgerow network which comprises approximately 65km within the Sites, such losses are proportionately extremely small."</i></p>	
WLDC 8.19	<p>WLDC identify the following negative impacts during construction:</p> <p>The streams and ditches associated with Cottam 3a all drain into the Northorpe Beck and, thereafter, the River Eau, which are downstream of the watercourses within Laughton Common SSSI.</p>	<p>The Applicant acknowledges the potential hydrological pathway between Cottam 3b and Laughton Common SSSI which has been identified within C6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-044]. Measures which seek to minimise the risk of discharge of pollutants and sediments into watercourses on or surrounding the Scheme are set out within the C7.19 Outline Ecological Protection and Mitigation Strategy [APP-356] which is secured through Requirement 8 of the C3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C]. These measures include the protection of boundary features through exclusion fencing, dust and runoff prevention measures when working in extremely dry or wet weather, and the safe storage and use of fuels/chemicals.</p> <p>As such, the potential for negative impacts on Laughton Common SSSI during construction has been ruled out.</p>
WLDC 8.20	<p><i>"Coates Wetland LWS and Trent Port Wetland LWS are located close to the Shared Cable Corridor, where multiple cables from this and other proposed solar energy projects may be sited, there is the possibility that prolonged trench opening or reopening work (depending on the timing and opportunity for co-ordination of cable installation) may exacerbate any such indirect fragmentation, as well as the potential for indirect degradation through pollution events."</i></p>	<p>Potential impacts on designated sites have been assessed within C6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-044]. It is proposed that Coates Wetland LWS and Trent Port Wetland LWS are protected through the use of Horizontal Directional Drilling. As a result of this, a simultaneous or sequential cable installation programme should not cause any cumulative impacts.</p>
WLDC 8.21	<p><i>"A total length of between approximately 180 and 420m of hedgerow may be affected by the cabling works."</i></p>	<p>The potential for likely significant effects on ecology resulting from the cable installation works have been identified and described within Section 9.5 of C6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-044], with extensive mitigation measures identified (in Section 9.6 and 9.7) to minimise these effects. These mitigation measures are further outlined in the C7.19 Outline Ecological Protection and Mitigation Strategy [APP-356] – particularly Section 2.4, Section 6 and Section 11. It is acknowledged that, due to the length of the cable route corridor, some adverse short to medium term impacts on the hedgerows and associated drainage ditches will occur in order to facilitate the trenching works. However, use of Horizontal Directional Drilling techniques will ensure that all impacts upon hedgerows, trees and watercourses assessed to be of elevated ecological importance (streams, rivers, species-rich and ecologically important hedgerows and mature trees) will be avoided entirely. This will be secured through the enactment of the final Ecological Protection and Mitigation Strategy [APP-356] together with C7.17_A Crossing Schedule Revision A [REP-041] which details the location of all features to be crossed using</p>

LIR Ref.	Summary	Applicant's Response
		<p>HDD. A detailed Ecological Protection and Mitigation Strategy has been secured via Requirement 8 of C3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C].</p> <p>It is therefore only the remaining species-poor and intensively managed hedgerows which stand to be directly impacted by open cut trenching. These removed sections will be relatively short (approximately up to 6.5m each). In addition, cabling works are temporary and progressive meaning that restoration and replanting will follow once works in each section is complete. Residual impacts on these hedgerows have been assessed as being adverse in the short and medium term (significant at Site level only), and neutral in the long term. Please note that Hedgerow Removal Plans will be submitted at Deadline 2 and appended to the LEMP, which will show the indicative temporary hedgerow removals required for the installation of the cable route.</p>
WLDC 8.22 WLDC 8.23	Adverse reductions in habitat quality/direct harm to bats during construction and deliberate or accidental tree loss.	<p>The Applicant acknowledges this comment. Mitigation measures for bats are included within paragraphs 9.7.118 to 9.7.121 of C6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-044] and in the C7.19 Outline Ecological Protection and Mitigation Strategy [APP-356] which includes the adoption of buffer zones to minimise risks from disturbance and habitat damage/degradation, the retention of all trees where possible and further survey of trees that require removal. Taking into account the embedded mitigation within Chapter 9 of the ES and the Outline EPMS, construction phase residual effects upon bats are considered to be neutral and not significant assuming this is followed in full.</p> <p>In the medium to long term, the extensive habitat enhancement measures included within C7.3_B Outline Landscape and Ecological Management Plan [EN010133/EX2/C7.3_B], centring around the reversion of arable to more diverse grasslands, with the addition of higher ecological grassland types within buffers and easement, the planting and favourable management of hedgerows, trees and creation of new ponds can be expected to bring about improvements for bats.</p>
WLDC 8.24	<i>"The effects of the installation of solar panels on bat activity and the activity of their prey is largely unknown, as highlighted by Natural England in their 2016 evidence review of the impact of solar farms on birds, bats and general ecology. However, a recent study into this concluded no significant differences in bat abundance between the centre and edges of fields containing solar arrays. Some concern has previously been raised that the presence of solar panels may have adverse impacts on bats when echolocating, for instance by confusing solar panels for waterbodies, from which bats both glean insects and drink."</i>	The Applicant concurs that these comments reflect the assessment provided in C6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-044].
WLDC 8.25	<i>Otters and water voles may be impacted through direct harm (to animals or their burrows) or disturbance during any construction activity affecting boundary habitats (ditches, watercourses and associated adjacent scrub, hedgerows or woodland). This is considered more likely where carried out in relation to rivers or significant watercourses and ditches, rather than smaller ditches. Cable installation works will also require the incursion into approximately 50 ditches which has the potential to cause direct harm to water voles and otters.</i>	The Applicant acknowledges that this comment is extracted from Paragraph 9.7.127 - 9.7.128 of C6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-044]. Mitigation measures for otters and water voles are included within Paragraphs 9.7.132 to 9.7.136 of C6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-044] and in the C7.19 Outline Ecological Protection and Mitigation Strategy [APP-356] which is secured through Requirement 8 of the C3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C]. Taking into account the embedded mitigation within the Outline EPMS, construction phase residual effects upon otters and water voles are considered to be neutral and not significant.
WLDC 8.26	<i>Impacts upon reptiles might comprise direct harm, habitat degradation and habitat loss during clearance of hedgerows or other field boundary habitats required for permanent/temporary construction and maintenance access or cable trenching. Where limited numbers of breaches for Site access are required, some minor habitat loss can be expected, although the distances involved (3-6.5m) are not considered to be a significant barrier to dispersal. During cable installation, habitat reinstatement will follow immediately after completion of trenching in each location, therefore impacts on connectivity are considered to be temporary and short-term.</i>	<p>The Applicant acknowledges this comment.</p> <p>Protective construction-phase measures for reptiles are detailed within the C7.19 Outline Ecological Protection and Mitigation Strategy [APP-356] and are likely to reduce potential construction phase effects to non-significant neutral levels. It is anticipated that the habitat enhancement measures which are set out in C7.3_B Outline Landscape and Ecological Management Plan [EN010133/EX2/C7.3_B], in conjunction with the favourable management of buffer zones which are considerably larger than current field margins, would result in a beneficial effect for reptiles during the operational phase of the Scheme.</p>

LIR Ref.	Summary	Applicant's Response
WLDC 8.27 WLDC 8.28	Potential for nesting birds to be harmed during site clearance to facilitate access or cabling works.	Mitigation measures for nesting birds are included within paragraphs 9.7.172 to 9.7.181 of C6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-044] and in the C7.19 Outline Ecological Protection and Mitigation Strategy [APP-356] which is secured through Requirement 8 of the C3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C]. Sections 5.3, 5.4 and 9.2 of the Outline EPMS details nest avoidance precautions to be taken during the construction phase at both the array Sites and Cable Route Corridor. These will comprise measures such as seasonally timed working, the presence of an Ecological Clerk of Works and the setting up of exclusion zones around nesting sites should any be identified during operations. For all species, nest avoidance procedures during the construction phase will ensure that direct impacts on birds and their nests will be minimised to neutral levels.
WLDC 8.30	<i>"During construction works, if deep trenches are left open overnight or high voltage machinery is present, there may be potential for incidental injury or mortality to badgers exploring the site during the night."</i>	Mitigation measures for badgers are included within paragraphs 9.7.230 to 9.7.233 of C6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-044] and in the C7.19 Outline Ecological Protection and Mitigation Strategy [APP-356] which is secured through Requirement 8 of the C3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C]. Sections 8 and 5.5 of the Outline EPMS details measures to be taken to reduce the probability of incidental mortality of badgers, especially in situations where open excavations are made and in respect of site speed limits. This also includes attendance during any habitat removal for temporary or permanent construction/maintenance accesses and cable trenching, in order for any previously undetected or recently-dug setts to be searched for and either avoided (through realignment of working area) or mitigated for through recourse to licensed sett closure. With the implementation of the buffer zones and embedded mitigation measures as contained within the EPMS, effects on badgers are anticipated to be neutral during the construction phase.
WLDC 8.31	<i>"Invasive non-native species may be caused to spread through works associated with ditches and crossing thereof, or during any necessary works to clear habitats. Non-native plant species are considered most likely to occur at field boundaries and in habitats associated with watercourses."</i>	Section 5.7 of the C7.19 Outline Ecological Protection and Mitigation Strategy [APP-356] sets out precautionary measures to be taken to avoid the accidental spread of invasive species. This includes a briefing for all construction staff on the issue to ensure vigilance for these species, as well as inspections of proposed working locations at watercourses and ditches by an ecologist prior to commencement. It is considered that the continued and specific monitoring for invasive non-native plant species as set out in the EPMS will reduce potential residual effects on this issue to neutral levels, especially considering their absence in the baseline information to date.
WLDC 8.32	WLDC identify the following positive impact during operation: 1. <i>"Water quality can be expected to significantly increase post-development due to the anticipated reversion to permanent grassland under the array (reduced sediment run-off) and cessation of application of fertilisers and pesticides."</i>	The Applicant notes that these comments reflect the assessment provided in C6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-044].
WLDC 8.33 WLDC 8.34 WLDC 8.35 WLDC 8.36 WLDC 8.37	WLDC identify the following neutral impacts during operation: 1. <i>"Of the sites located within 5km north of Cottam 3a and Cottam 3b, it is considered unlikely that any impacts beyond the low possibility of contamination or sediment mobilization occurring."</i> 2. <i>Impacts on reptiles and amphibians during the operation of the Scheme are likely to be minimal, considering the adoption of ecological buffer zones and the restriction of development and vehicle movement to outside of these, save for habitat management operations."</i>	The Applicant notes that these comments reflect the assessment provided in C6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-044].

LIR Ref.	Summary	Applicant's Response
	<ol style="list-style-type: none"> 3. <i>Owing to the use of development free buffer zones from the onset of construction, it is considered unlikely that the habitats within which breeding birds nest will be degraded through the presence of the adjacent arrays.</i> 4. <i>Perimeter fencing is not considered to be a barrier to badger movement given their propensity for digging (the fencing will not be buried).</i> 5. <i>Should invasive species be present, operational phase impacts are considered unlikely due to the buffering of peripheral habitats included within the Scheme."</i> 	
WLDC 8.38	<p>WLDC identify the following negative impact during operation:</p> <ol style="list-style-type: none"> 1. <i>"The loss of habitats remains a negative impact, however the provided mitigation and BNG are delivered and maintained, these impacts will be addressed."</i> 	<p>C6.3.9.12 ES Appendix 9.12 Biodiversity Net Gain Report [APP-089] sets out how a significant net gain for biodiversity has been calculated and will be secured via Requirement 9 of Schedule 2 of C3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C] for the life of the Scheme alongside the implementation of the LEMP C7.3_B Outline Landscape and Ecological Management Plan [EN010133/EX2/C7.3_B], as secured by Requirement 7 of C3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C]. The BNG Report [APP-089] shows that a net gain of 96.09% for habitat units, 70.22% for hedgerow units and 10.69% for river units is anticipated to be achieved through the Scheme. The LEMP allows for regular ecological monitoring and adaptation of the management prescriptions in response to changing conditions within the Order Limits so as to ensure the long-term achievement of its aims and persistence of net gain.</p>
WLDC 8.40 WLDC 8.41	<p>WLDC identify the following positive impact during decommissioning:</p> <ol style="list-style-type: none"> 1. <i>"The restoration of the land back to open arable farmland would likely be beneficial for some species of farmland bird which require open sightlines, as well as for plant species associated with arable margins."</i> <p>WLDC identify the following neutral impact during decommissioning:</p> <ol style="list-style-type: none"> 6. <i>"Depending on the ecological value of the habitats that develop over the lifespan of the scheme, it is realistic that certain areas of the site may be retained due to their value for wildlife on decommissioning.."</i> 	<p>The Applicant notes that these comments reflect the assessment provided in C6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-044].</p>
WLDC 8.42	<p>WLDC identify the following negative impacts during decommissioning:</p> <ol style="list-style-type: none"> 1. <i>"Much of the biodiversity value which it is anticipated will develop in the preceding (approximately) forty years would be lost along with habitat for a variety of other species. In order to revert back to arable food production, it may be necessary to enhance the nutrient content of the soil if it has been depleted, which would likely be achieved through treatment with fertilisers, although it is believed that this is highly unlikely and an increase in soil fertility is likely to arise."</i> 2. <i>An increase in the use of pesticides and herbicides would also be expected. The decision on the farming type to be used will be made by the landowner prior to decommissioning."</i> 3. <i>Based upon current (2022) legislative protection, protected species which could be directly impacted by decommissioning activities would include badgers, water vole, otter, great crested newts, reptiles (grass snake) and breeding birds. Further surveys to</i> 	<p>The Applicant notes that these comments reflect the assessment provided in C6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-044].</p> <p>A Decommissioning Plan will be prepared in accordance with the Outline Decommissioning Statement [APP-338] which is secured by Requirement 21 in Schedule 2 of C3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C]. This will ensure the potential decommissioning impacts are minimised.</p> <p>Section 9.8.4 of C6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-044] states that no more than twelve months prior to decommissioning commencing, the site will be visited by an appropriately qualified ecologist to identify any ecological constraints arising from decommissioning activities. Further surveys, mitigation and/or compensatory measures may then be required in line with prevailing guidance. As a minimum, an extended Phase 1 Habitat survey (or equivalent) is considered likely to be required to identify the potential presence of protected species and important habitats.</p> <p>Any mitigation measures undertaken at the point of decommissioning aimed at maintaining ecological value of the Scheme Sites should take account of changes in ecological objectives that have occurred over the lifespan of the</p>

LIR Ref.	Summary	Applicant's Response
	<p><i>identify the use of the site by these receptors would therefore also be expected as a minimum."</i></p>	<p>Scheme. In particular, changes in ecological conditions both on the Sites and on a national scale as a result of climate change may result in new ecological objectives that cannot at the current time be reasonably foreseen.</p>
<p>WLDC 8.46 WLDC 8.47</p>	<p>WLDC identify the following positive cumulative impacts:</p> <ol style="list-style-type: none"> 1. <i>"Effects from the Scheme on bats are likely to be neutral to moderately beneficial. Because of this, cumulative effects of these three projects with the Scheme are unlikely, although each project might cause its own adverse effects individually (unclear at this stage from review of available documents).</i> 2. <i>Given the moderate beneficial effects of the Scheme on reptiles and amphibians, and the likelihood that hedgerow habitats will be preserved within the three projects, no adverse cumulative impacts are anticipated. Depending on habitat retention, creation and management prescriptions to be implemented within them, a moderate cumulative beneficial effect potentially significant at a District level could occur."</i> 	<p>The Applicant acknowledges these comments.</p>
<p>WLDC 8.48 WLDC 8.49 WLDC 8.50 WLDC 8.51 WLDC 8.52 WLDC 8.53 WLDC 8.54 WLDC 8.55</p>	<p>WLDC identify the following neutral cumulative impacts:</p> <ol style="list-style-type: none"> 1. <i>"As most of the designated sites which were at risk of significant impacts from the Scheme were located substantially distant from the other three solar proposals, no cumulative impacts were considered likely to occur. Therefore, all neutral residual effects are likely to remain as such.</i> 2. <i>It is understood that the Gate Burton and West Burton solar proposals will retain and protect boundary habitats and all other habitats of ecological value. It is also assumed that attempts will be made to minimise the loss of hedgerow and incursions/culverting of ditches and watercourses wherever possible. The nature of solar schemes is to occupy field centres, and the pervasive land use in this area is arable/cereal farming. It is presumed that buffer zones protecting marginal habitats will be instigated in all cases. Furthermore, as residual effects from the Scheme on valued habitats are neutral, it is considered unlikely that an elevation to an adverse effect would occur in combination with these projects.</i> 3. <i>When referring to otters and water vole, the Scheme and Gate Burton Energy Park are relatively unlinked, hydrologically, meaning dispersal by these species between it and the Scheme is less likely. The West Burton Solar Project shares a hydrological link via the River Till. It is unknown how linked Tillbridge Solar will be, but Cottam 2 is located relatively close by, As effects from the Scheme are neutral to minor beneficial, it is considered unlikely that cumulative effects on these species would occur, but this is provided that they will retain boundary features, including ditches and watercourses, and minimise direct impacts upon them as far as possible.</i> 4. <i>Given the neutral to minor beneficial effects of the Scheme on Polecat, Hedgehog, Brown Hare, and the likelihood that hedgerow habitats will be preserved within the three projects, no cumulative effects are anticipated.</i> 5. <i>Given the retention and protection of watercourses and marginal habitat with the Scheme, no adverse cumulative impacts are considered likely on invertebrate and freshwater fish. There is the potential for a cumulative beneficial effect from the projects, should they also focus on the creation of a range of diverse grassland habitats within and outside of panelled areas.</i> 	<p>The Applicant acknowledges these comments.</p>

LIR Ref.	Summary	Applicant's Response
	<p>6. <i>As no invasive species were recorded within the Scheme, no cumulative effects are considered likely.</i></p> <p>7. <i>Several designated sites were located close to the Shared Cable Route Corridor, particularly Coates Wetland LWS, Trent Port Wetland LWS (which occur close to the proposed River Trent crossing point) and Cow Pasture Lane Drains LWS. It is proposed that these sites are protected through the use of Horizontal Directional Drilling. In which case, a simultaneous or sequential cable installation programme should not cause any cumulative impacts.</i></p> <p>8. <i>An 18 month cable works programme for the simultaneous installation option would enable habitats removed/disturbed by the works to be reinstated in reasonable time, as assessed above in this Chapter. None of the habitats recorded within the field surveys were of such value as to mean they could not withstand some temporary loss from a working width, or that wider effects would be caused."</i></p>	
WLDC 8.56	<p>WLDC identify the following negative cumulative impacts:</p> <p>1. <i>"As the three projects are highly likely to replace the arable habitats with grassland, there is the potential for a cumulative impact on harvest mice which typically rely on tall, tussocky grassland as well as arable crops. Depending on the degree of marginal habitat retention and tussocky grassland creation, a minor cumulative adverse effect operating at a Local or District scale may be caused."</i></p>	<p>The cumulative effects assessment is set out within Section 9.9 of the C6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-044]. The Applicant acknowledges that this comment is extracted from Paragraph 9.9.9 of C6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-044].</p>
WLDC 8.57	<p>2. <i>"Ground nesting birds are likely to be affected through displacement by each of the proposed projects given the incompatibility of solar hardware with the necessary long, unbroken sightlines required by these species for predator avoidance when nesting. The degree of adverse impact depends on the level of mitigation each Scheme is able to provide. It is understood that the West Burton Solar Project is to provide in the region of 100ha of land suitable for ground nesting birds within its Order Limits which will significantly reduce adverse impacts. At this point, it is not known what mitigation will be provided for ground nesting birds at the other two projects. Consequently, it is likely that a moderate cumulative adverse effect on skylark at potentially a District level may occur. Similar effects on yellow wagtail, grey partridge and quail may also occur."</i></p>	<p>The cumulative effects assessment is set out within Section 9.9 of the C6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-044]. The Applicant acknowledges that this comment is extracted from Paragraph 9.9.11 of C6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-044].</p>
WLDC 8.58	<p>3. <i>"As flocks of many overwintering bird species rely on open habitats when foraging, it is unlikely that impacts on these species will be neutral or beneficial at the three projects, provided that these species occur at them. Consequently, given their proximity to the Scheme, a cumulative adverse effect at Local scale is possible."</i></p>	<p>The cumulative effects assessment is set out within Section 9.9 of the C6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-044]. The Applicant acknowledges that this comment is extracted from Paragraph 9.9.12 of C6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-044].</p>
WLDC 8.59	<p>4. <i>"A sequential programme over five years would be expected to give rise to a cumulative adverse effect, considering the need for the compounds, jointing bays, haul routes etc to remain in place for five years. Although, the trenching works could be completed and remediated as a priority given that cable pulling could be carried out at any time once the ducts are installed. This would minimise the number of hedgerow incursions which would need to remain in place, limiting them to haul route gaps only. Consequently, the sequential programme would have greatest impact on hedgerow habitat, followed by grasslands including semi-improved grassland and lowland floodplain grassland."</i></p>	<p>The cumulative effects assessment is set out within Section 9.9 of the C6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-044]. The Applicant acknowledges that this comment is extracted from Paragraph 9.9.17 of C6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-044].</p>

LIR Ref.	Summary	Applicant's Response
WLDC Table 22-1	<ol style="list-style-type: none"> 1. <i>“Several designated sites were located close to the Shared Cable Route Corridor, particularly Coates Wetland LWS, Trent Port Wetland LWS (which occur close to the proposed River Trent crossing point) and Cow Pasture Lane Drains LWS. It is proposed that these sites are protected through the use of Horizontal Directional Drilling. In which case, a simultaneous or sequential cable installation programme should not cause any cumulative impacts.</i> 2. <i>An 18 month cable works programme for the simultaneous installation option would enable habitats removed/disturbed by the works to be reinstated in reasonable time, as assessed above in this Chapter. None of the habitats recorded within the field surveys were of such value as to mean they could not withstand some temporary loss from a working width, or that wider effects would be caused.</i> 3. <i>A sequential programme over five years would be expected to give rise to a cumulative adverse effect, considering the need for the compounds, jointing bays, haul routes etc to remain in place for five years. Although, the trenching works could be completed and remediated as a priority given that cable pulling could be carried out at any time once the ducts are installed. This would minimise the number of hedgerow incursions which would need to remain in place, limiting them to haul route gaps only. Consequently, the sequential programme would have greatest impact on hedgerow habitat, followed by grasslands including semi-improved grassland and lowland floodplain grassland.”</i> 	<p>The cumulative effects assessment is set out within Section 9.9 of the C6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-044]. The Applicant acknowledges that this comment is extracted from Paragraph 9.9.15 – 9.9.17 of C6.2.9 ES Chapter 9 Ecology and Biodiversity [APP-044].</p>
WLDC 23.12 WLDC 23.13 WLDC 23.14	<p>WLDC summarises on Ecology and Biodiversity:</p> <p><i>“During construction, the Scheme will result in the loss, degradation and fragmentation of habitats. It will also cause disturbance the flora and fauna of West Lindsey. There is also the potential that the Scheme would introduce invasive species.</i></p> <p><i>Operational impacts of the Scheme could include light disturbance to bats and birds. There is also the potential that Battery and Energy Storage System (BESS) will generate noise attraction or disturbance.</i></p> <p><i>Maintenance activities could also have an impact on ecological receptors.”</i></p>	<p>The Applicant respectfully disagrees with WLDC's summary.</p> <p>The C7.19 Outline Ecological Protection and Mitigation Strategy [APP-356] sets out the environmental and ecological protection measures to be followed throughout the construction of the Sites and construction of the Cable Route. Principal measures will include the fencing and buffering of all valuable boundary features such as hedgerows, ditches, watercourses, ponds and woodland edges and the adoption of methods to avoid the risk of accidental damage, pollution or contamination, as well as harmful disturbance or injury to any wildlife. The measures within the EPMS to be adopted during the installation of the cable include the presence of an Ecological Clerk of Works, sensitive seasonal timing of works and the use of Horizontal Directional Drilling to avoid unacceptable impacts on features such as the Rivers Trent and Till and the larger streams and drains. Measures are also included within the Outline EPMS to prevent the spread of invasive species.</p> <p>Operation of the arrays requires minimal intervention and as such levels of disturbance (light, noise and human presence) upon wildlife within the Sites will be minimal, and likely lower or no more than at present, during the operational phase. As noted in C6.2.4 ES Chapter 4_Scheme Description [APP-039], operational lighting will only be necessary during periodic maintenance activities during the hours of darkness and only associated with substation structures and the Battery Energy Storage System. All luminaires used during the operation of the Scheme will be downward directional so as to avoid upward light and will be directed away from ecological buffers that provide protection for important ecological features.</p> <p>The C7.3_B Outline Landscape and Ecological Management Plan [EN010133/EX2/C7.3_B] sets out all the habitat creation and management prescriptions to be adopted through the life of the operational scheme. This will particularly focus on the creation of new hedgerows, diverse grassland (e.g. pollinator-mix grassland, herb-rich flowering grassland and tussocky grassland) woodland and wetland habitats, as well as the favourable management of the grasslands under and surrounding the arrays so as to maximise their value to biodiversity. Approximately 20km of new native hedgerow will be planted, 10ha of woodland and over 900ha of various grassland types. Retained hedgerows and ponds will benefit from their sensitive management and the cessation of arable practices. All habitat</p>

LIR Ref.	Summary	Applicant's Response
		creation and management prescriptions required in order to mitigate for potential adverse effects of the Scheme will be set out in the LEMP. Ecological enhancement measures are also contained in the LEMP, including new nesting and roosting habitat for birds and bats, pond enhancement measures and measures required to achieve a Biodiversity Net Gain at the Scheme. The C6.3.9.12 ES Appendix 9.12 Biodiversity Net Gain Report [APP-089] shows that a net gain of 96.09% for habitat units, 70.22% for hedgerow units and 10.69% for river units is anticipated to be achieved through the Scheme. The LEMP provides for regular ecological monitoring and adaptation of the management prescriptions in response to changing conditions within the Order Limits so as to ensure the long-term achievement of its aims and persistence of net gain.
General Matters (including DCO)		
BDC pg.2-3	<p>Relevant development proposals under consideration or granted permission but not commenced or completed are listed in the table on pages 2-3.</p> <p>The issue of cumulative development especially with other proposed NSIPs will need careful consideration by the examiner to ensure that the proposed development is in accordance with current planning policy.</p>	<p>A cumulative effects assessment has been prepared for the Application within the Environmental Statement [APP-036 to APP-058], Cumulative effects assessments for each topic are set out in each of the ES Chapters and include the assessment of the impacts of the Scheme cumulatively with other identified NSIPs in the local area (see paragraph 2.5.9 of C6.2.2 ES Chapter 2 EIA Process and Methodology [APP-037]. This assessment is in accordance with Schedule 4 of the 2017 EIA Regulations and PINS Advice Note 17. The mitigation measures set out across the ES therefore account for anticipated cumulative effects.</p> <p>At the request of the ExA, the Applicant submitted at Deadline 1 C8.1.8 Joint Report on Interrelationships between Nationally Significant Infrastructure Projects [REP-054]. This includes a Review of Cumulative Effects at Appendix E which summarises the assessments of cumulative effects for each topic for the Scheme and presents them alongside the assessments for the three other proposed NSIPs, Gate Burton Energy Park, West Burton Solar Project and Tillbridge Solar Project. This Report was produced jointly by the applicants of all four schemes.</p>
BDC pg.14	<p>The site within Bassetlaw lies within a predominately rural area and comprises of the cable route corridor. The area constraints have been outlined in the policy section.</p> <p>The Council has no further comment to make regarding DCO obligations and their impact on the local authority's area.</p>	The Applicant notes this comment.
LCC 6.15	The Council acknowledges that the Cottam Solar Project would make a significant contribution towards renewable energy generation, providing the electricity to power an equivalent of approx. 180,000 homes. This aligns with the Government's commitments to cut greenhouse gases by 80% of 2050.	The Applicant agrees with this statement.
LCC 6.16	<i>"The Council recognises that solar energy development can help meet targets for reducing carbon emissions, reduce reliance on fossil fuels and provide local energy security. They can also provide economic diversification for farmers and landowners and support local employment opportunities. Therefore whilst the Cottam Energy Project, by its nature offers significant positive impacts in terms of the production of clean renewable energy and the transition and movements towards Net Zero, in order to be supported it must be demonstrated that there are no significant adverse environmental impacts that cannot be appropriately managed and/or mitigated through the DCO process. The Council's position is therefore that, adopting a 'whole life' approach to GHG emissions, there are no negative and neutral impacts and that significant positive impacts would accrue."</i>	The Applicant notes this comment.
LCC 15.1	<i>"The Council may wish to make further representations as appropriate during the examination and at issue specific hearings relating to matters that are not contained within this LIR particularly with regard to the draft DCO. Therefore, the comments contained above are</i>	The Applicant notes this comment.

LIR Ref.	Summary	Applicant's Response
	<i>provided without prejudice to the future views that may be expressed by the Council in its capacity as an Interested Party in the examination process."</i>	
NCC Table 1 NCC 2.67 NCC 2.69	Relevant development proposals under consideration or granted permission but not commenced or completed are listed in Table 1 on pages 12-13. The issue of cumulative development especially with other proposed NSIPs will need careful consideration by the examiner to ensure that the proposed development is in accordance with current planning policy.	A cumulative effects assessment has been prepared for the Application within the Environmental Statement [APP-036 to APP-058], Cumulative effects assessments for each topic are set out in each of the ES Chapters and include the assessment of the impacts of the Scheme cumulatively with other identified NSIPs in the local area (see paragraph 2.5.9 of C6.2.2 ES Chapter 2 EIA Process and Methodology [APP-037]. This assessment is in accordance with Schedule 4 of the 2017 EIA Regulations and PINS Advice Note 17. The mitigation measures set out across the ES therefore account for anticipated cumulative effects. At the request of the ExA, the Applicant submitted at Deadline 1 C8.1.8 Joint Report on Interrelationships between Nationally Significant Infrastructure Projects [REP-054]. This includes a Review of Cumulative Effects at Appendix E which summarises the assessments of cumulative effects for each topic for the Scheme and presents them alongside the assessments for the three other proposed NSIPs, Gate Burton Energy Park, West Burton Solar Project and Tillbridge Solar Project. This Report was produced jointly by the applicants of all four schemes.
NCC 2.76	The site lies predominantly within Lincolnshire within a mainly rural area the Nottinghamshire element comprises of the cable route corridor. The area constraints have been outlined in the policy section.	The Applicant notes this comment.
NCC 2.85 NCC 2.86	It is requested that the examiner considers the time period for the life of the project. County Council officers are of the opinion that if the ES has been based on a life period of 40 years then the development order consent should be for up to 40 years and not last indefinitely. The Council has no further comment to make regarding DCO obligations and their impact on the local authority's area.	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.
WLDC 22.16 WLDC 22.17 WLDC 22.18	<i>"The 18 month period for the installation of the cables for all the schemes is six months less than the 24-36 months predicted under the Gate Burton ES. This suggests there is limited understanding of the construction phases between the three projects.</i> <i>The Applicant states that it is their intention of the Scheme to coordinate the discharge of any pre-construction requirements relating to works in the Shared Cable Corridor. This is not secured under the DCO and therefore there is no obligation for the Applicant to coordinate the discharge of requirements if it does not suit them.</i> <i>The shared Grid Connection will also include Tillbridge; however, this is not included in the assessments in the ES."</i>	As set out in ES Chapter 4: Scheme Description [REP-012], the assessment of the cumulative impacts within the Environmental Statement is based on two scenarios, with the three projects' (Gate Burton Energy Park, West Burton Solar Project and the Scheme) ducts and cables either being installed at the same time over 18 months or being installed sequentially over a maximum duration of 5 years. The effect of the protective provisions in paragraphs 136 to 167 (Part 11, 'For the protection of Gate Burton Energy Park Limited', and Part 12, 'For the protection of West Burton Solar Project Limited') of Schedule 16 of C3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C] is to require the applicants to coordinate the works in the Shared Cable Corridor. The intended use by Tillbridge of the Shared Cable Corridor was considered in the ES, as set out in ES Chapter 2: EIA Process and Methodology [APP-037]. Section 3.5 of C8.1.8_A Joint Report on Interrelationships between Nationally Significant Infrastructure Projects Revision A [EN010133/EX2/C8.1.8_A] sets out how the applicants collaborated on the design of the Shared Cable Corridor and on mitigation measures.
Glint and Glare		
WLDC 15.1	WLDC raise the following points arising from the review of the Glint and Glare chapter of the Environmental Statement: 1. It is not clear why Headon airfield is not considered as it appears that one of the runways may have issues and within the pilots' field of view.	The Applicant responds to the following issues with regard to Glint and Glare: 1. The assessment has not considered Headon (General Aviation) Airfield because it is located circa 15km south-west of the Scheme. Glint and glare assessments for aviation receptors are typically undertaken for licensed aerodromes within 10km of a proposed solar development.

LIR Ref.	Summary	Applicant's Response
	<ol style="list-style-type: none"> 2. A physical survey of the site and its environs is expected to be able to fully assess the receptors and study area. 3. A statement has been added to cover river users but specifically on the River Trent as being too far away and mentions that the River Till is not considered navigable. However, no substantiation has been provided for this statement. 4. The strategy of additional vegetation screening mentioned and temporary screening does not define the species of the vegetation which we would expect to be dense and coniferous in nature. The height of vegetation is not mentioned. 	<p>Geometric modelling for general aviation unlicensed aerodromes is typically required within 5km of a proposed development. At ranges of 10-20km, the requirement for assessment is much less common for licensed aerodromes, with typical assessment only being undertaken for licensed aerodromes at these ranges. Assessment of any aviation effects for developments over 20km is not a usual requirement.</p> <ol style="list-style-type: none"> 2. The glint and glare assessment concludes that there is not any requirement for any additional surveys. The glint and glare assessment has been undertaken in line with the associated guidance and industry best practice. 3. River Trent is located more than 1km from the Scheme. At this distance any glint and glare effect would not be significant. The Till River is located near the Cottam 1 Site. Based on the review of the available imagery, the section of river within 1km from the Site is predicted to be too small for navigation. 4. The level of vegetation should be sufficient to reduce the impact to an acceptable level. The height, length and type should be specified within the landscape assessment document. <p>The Landscape and Visual Impact Assessment (LVIA) contained within C6.2.8_A ES Chapter 8 Landscape and Visual Impact Assessment Revision A [EN010133/EX2/C6.2.8_A] takes into account the effects of Glint and Glare at paragraphs 8.9.19 to 8.19.20 where likely significant effects are identified at the construction stage. The landscape mitigation measures will provide new planting to mitigate the potential effects of glint and glare, which will include new native hedgerows and tree cover, and this will also include their management and maintenance. The mitigation has involved the development of the C7.3_B Outline Landscape and Ecological Management Plan [EN010133/EX2/C7.3_B] and 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) [REP-024 to REP-034] which are secured by Requirement 7 of Schedule 2 of C3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C].</p>
WLDC 15.6 WLDC 15.7 WLDC 15.8	WLDC has identified no positive, no neutral and no negative impacts during construction and decommissioning.	Any impact during the construction and decommissioning phases would be equal or lower when compared to operational phase.
WLDC 15.9	WLDC has identified no positive impacts during operation.	The Applicant agrees with this statement.
WLDC 15.10	WLDC identify the following neutral impact during operation: <i>"The worst case scenario effects without mitigation are predicted to be minor/negligible adverse (for either the fixed or tracker options) in respect of aviation receptors. Therefore, mitigation is not required for the aviation receptors."</i>	The Applicant agrees with this statement.
WLDC 15.11 WLDC 15.12 WLDC 15.13 WLDC 15.14 WLDC 15.15 WLDC 15.16	WLDC identify the following negative impacts during operation: <ol style="list-style-type: none"> 4. <i>"A moderate adverse effect from glint and glare is predicted for 13 dwellings (if a fixed mounting system is implemented) or 14 dwellings (if a tracking mounting system is implemented) across the Scheme. For the remaining dwelling receptors assessed in the 1km study area, effects are predicted to be lower.</i> 5. <i>A moderate adverse effect is predicted for a 2.2km section of Kirton Road – B1205 – (if a tracking mounting system is implemented). For the remaining road receptors assessed in the 1km study area, effects are predicted to be lower.</i> 	The Applicant agrees with this statement.

LIR Ref.	Summary	Applicant's Response
	<p>6. A moderate adverse effect is predicted towards train driver receptors (for both types of mounting system). For the remaining railway receptors assessed in the 500m study area, effects are predicted to be lower.</p> <p>7. Once mitigation is implemented, overall impacts are expected to be minor/negligible for all receptors predicted to experience moderate adverse effects.</p> <p>8. The cumulative glint and glare effect of West Burton Solar Project, Gate Burton Energy Park and Tillbridge Solar is not predicted to result in a significant impact due to the presence of significant mitigating factors. Therefore, cumulative effects are possible, however, the impact is predicted to be minor/negligible Adverse.</p> <p>9. Additionally, 32 dwellings will have some visibility of both Cottam 3a and Cottam 3b and some road receptors will also have some visibility of both these sites, resulting in the potential for inter-related effects. However, the existing and proposed screening is likely to significantly reduce the visibility of both sites and therefore overall minor/negligible adverse impacts are predicted."</p>	
WLDC 15.17	"Shared receptors are either unlikely to concurrently have visibility of multiple areas (Cottam, Gate Burton Energy Park and West Burton 1) or, if visibility is possible, (Cottam 1 and 2 and Tillbridge Solar) no significant impact is predicted due to the presence of significant mitigating factors. Therefore, cumulative effects are possible however the impact is predicted to be Minor/Negligible Adverse."	The Applicant agrees with this statement.
Ground Conditions and Contamination		
WLDC 16.1	1. The construction period could result in of potential contaminant linkages from contaminated soils to human receptors, controlled waters and to the built environment.	The Construction Environmental Management Plan (CEMP) will clearly set out best practice to ensure any environmental impacts are as limited as possible during the construction period. With embedded mitigation and the implementation of well-established good industry practices for managing contaminated land which will be incorporated into the CEMP. As part of the submission an Outline Construction Environmental Management Plan (OCEMP) is provided (C7.1 Outline Construction Environmental Management Plan [APP-447]).
WLDC 16.5 WLDC 16.6	WLDC has identified no positive and no neutral impacts during construction, operation, and decommissioning.	The Applicant notes this comment.
WLDC 16.7 WLDC 16.8 WLDC 16.9	<p>WLDC identify the following negative impact during construction, operation, and decommissioning.</p> <p>1. "The ES identifies the risk of potential contaminant linkages from contaminated soils to human receptors (construction workers, adjacent site users or residents, and future site users), controlled waters (underlying aquifers and surface waters) and to the built environment. The ES identifies that there are a number of surface water features both on and adjacent to the Scheme, however, limited potential sources of contamination have been identified across the mainly agricultural land use.</p> <p>2. Small areas of potentially infilled ponds/Made Ground have been identified across the Scheme, however, given the small scale of these features and the age of any infill material, the potential for gas generation is low. Furthermore, the potential for hazardous ground gases to accumulate within confined spaces is considered very low. In addition, no buildings are proposed in the vicinity of potentially infilled ponds/pits across the Sites, breaking the contaminant linkage to the built environment.</p>	The Applicant notes this comment.

LIR Ref.	Summary	Applicant's Response
	<p>3. <i>During construction, operation and decommissioning, standard industry best practice measures would be adopted to avoid and reduce the risk to ground conditions. The Construction Environmental Management Plan (CEMP) [EN010133/APP/C7.16] will clearly set out best practice to ensure any environmental impacts are as limited as possible. With embedded mitigation and the implementation of well-established good industry practices for managing contaminated land which will be incorporated into the CEMP, it is considered that the potential effects of contamination or risk of contamination will be reduced to moderate/minor and would not be significant."</i></p>	
<p>WLDC 16.10 WLDC 16.11</p>	<p><i>"Notable substantial projects in close proximity to the Scheme are: West Burton Solar Project; Gate Burton Energy Park; and Tillbridge Solar.</i></p> <p><i>Given modern methods of construction and the low sensitivity end use, the cumulative effects to human health or controlled waters are considered to be negligible with the implementation of embedded mitigation measures such as the CEMP which would be appropriate for all development projects. There are currently two scenarios for the construction of the Shared Cable Corridor between the proposed solar farm Schemes a' however, the effect on ground conditions for both scenarios is considered a negligible alteration from the baseline."</i></p>	<p>The Applicant notes this comment.</p>
<p>Hydrology, Flood Risk, and Drainage</p>		
<p>LCC 10.16 LCC 10.17</p>	<p>LCC concludes the following:</p> <ol style="list-style-type: none"> <i>"The Council, as Lead Local Flood Authority for Lincolnshire concludes that the surface water Flood Risk is appropriately addressed at this outline stage in the ES; and suitable mitigation measures proposed in the CEMP. More detail would be needed on areas of the site which are proposed to be made impermeable and this could be captured by an appropriate requirement. The Draft DCO includes an appropriate requirement to ensure such details are provided.</i> <i>The Surface Water Flood Risk is also appropriately addressed at this outline stage, more detail would be needed on areas of the site which are proposed to be made impermeable and these could be conditioned. The energy storage facility (BESS) may create a large impermeable area and drainage details in accordance with SUDs principle would be needed for this – this is not mentioned in Appendix 10.1, although it is referred to in the Construction Management Plan."</i> 	<p>The Applicant confirms that details of areas in which there is proposed to be hardstanding will be developed during the detailed design process for the Scheme as described in section 5.0 'Drainage Strategy' of C6.3.10.1 ES Appendix 10.1 Flood Risk Assessment and Drainage Strategy Report [APP-090]. This will be secured post consent as part of the works to discharge of requirement 5.</p> <p>Paragraph 4.2.4 of C6.2.4_A ES Chapter 4 Scheme Description Revision A [REP-012] summarises the Application's work packages. Works No 2, 3, 4, 6, 7, 8 and 9 are to result in the creation of hardstanding elements. C7.15_A Concept Design Parameters and Principles [REP-039] when read alongside Additional Submission - Accepted at the discretion of the Examining Authority C2.4_A Works Plan Revision A [AS-007] further details the potential extent of areas which are to be made impermeable. The Applicant confirms that they are willing to provide further details of hardstanding elements at the detailed design process.</p> <p>As stated in C6.3.10.1 ES Appendix 10.1 Flood Risk Assessment and Drainage Strategy Report [APP-090], any runoff from hardstanding/small buildings on the Sites will be captured on site, to prevent increasing runoff from the Sites.</p>
LCC 10.18	<p><i>"In terms of the draft DCO requirements the Council considers that, in connection with surface water flooding, subject for a requirement of details of the site areas which are proposed to be made impermeable to be submitted to and approved in writing by the Council, if these are acceptable. No further additions are required at this stage for those covering highway matters but this will be kept under review during the examination as details of the other solar NSIPs in the area are made available."</i></p>	<p>The Applicant notes these comments.</p>
LCC 10.19	<p><i>"In summary, subject to the development being carried out as proposed within the DCO application documents and further details being agreed as part of subsequent DCO Requirements, the Council as Lead Local Flood Authority for Lincolnshire, is of the view that impacts of this proposal would be neutral."</i></p>	<p>The Applicant acknowledges these comments.</p>

LIR Ref.	Summary	Applicant's Response
WLDC 17.1	<p>WLDC raise the following points arising from the review of the Hydrology, Flood Risk and Drainage chapter of the Environmental Statement:</p> <p>5. There are several impacts on the water environment as a result of the Scheme. This includes increased flood risk, pollution from surface water runoff, increased water volume discharge and inappropriate wastewater disposal, among others.</p>	<p>The potential impacts on the water environment during construction, operation and decommissioning are considered in their entirety within the C6.2.10 ES Chapter 10_Hydrology Flood Risk and Drainage [APP-045]. As concluded within paragraph 10.11.1, with the embedded design measures described within the Chapter and those within the CEMP, all identified potential effects have been assessed as being of negligible significance, and therefore not significant in terms of the EIA Regulations.</p>
WLDC 17.8 WLDC 17.9	<p>WLDC has identified no positive and no neutral impacts during construction and decommissioning.</p>	<p>The Applicant acknowledges these comments.</p>
WLDC 17.10 WLDC 17.11 WLDC 17.12 WLDC 17.13 WLDC 17.14 WLDC 17.15 WLDC 17.16 WLDC 17.17	<p>WLDC identify the following negative impacts during construction and decommissioning:</p> <p>10. <i>"The sensitivity of construction workers and equipment to mud and debris blockages is considered to be Medium. The potential for mud and debris to block drainage networks is considered to have an effect of Low Adverse magnitude on flooding to the Site itself and surrounding area which would result in flood risk to construction workers and equipment at the Site. The effect is therefore considered to be Moderate Adverse.</i></p> <p>11. <i>Temporary increase in impermeable area during construction / decommissioning has the potential to increase flooding both on and off site.</i></p> <p>12. <i>The effects would be temporary and short term. The sensitivity of construction workers and equipment is considered to be Medium with the temporary effects considered to have an effect of Medium Adverse magnitude to people working within - and property at - the Site as it could occur at a time of high flood risk (e.g. during a large storm event). The significance of effect is Moderate Adverse.</i></p> <p>13. <i>Construction of access tracks and movement of construction / decommissioning traffic, in the absence of construction good practice, can lead to compaction of the soil. The effects would be temporary and short term. The sensitivity of construction workers and equipment is considered to be Medium with the temporary effects considered to have an effect of Medium Adverse magnitude to people working within - and property at - the Site as it could occur at a time of high flood risk (e.g. during a large storm event). The significance of effect is Moderate Adverse.</i></p> <p>14. <i>There are a number of activities which have the potential to negatively affect the local water environment. The sensitivity of surface water and groundwater bodies to silt contamination is considered to be Medium. Without mitigation, potential effects are considered of a Medium magnitude. The significance of the effect is Moderate Adverse.</i></p> <p>15. <i>Fuel, hydraulic fluids, solvents, grouts, paints and detergents and other potentially polluting substances will be stored and / or used on the Site. Leaks and spillages of these substances could pollute groundwater bodies through infiltration as well as the surface watercourses within the Site and those nearby if their use is not carefully controlled and spillages enter existing flow pathways. The sensitivity of surface water and groundwater bodies to spillages, leakages and pollutants is considered to be Medium. Without mitigation measures spillages of chemicals/fuel stored and/or used on the Site could cause short term, temporary effects of a Medium magnitude on the local watercourses.</i></p>	<p>The Applicant responds to the following issues regarding Hydrology, Flood Risk, and Drainage during construction and decommissioning:</p> <p>10. The Applicant acknowledges that this comment is extracted from Paragraph 10.6.3 of C6.2.10 ES Chapter 10_Hydrology Flood Risk and Drainage [APP-045].</p> <p>11. The Applicant acknowledges that this comment is extracted from Paragraph 10.6.4 of C6.2.10 ES Chapter 10_Hydrology Flood Risk and Drainage [APP-045].</p> <p>12. The Applicant acknowledges that this comment is extracted from Paragraph 10.6.5 of C6.2.10 ES Chapter 10_Hydrology Flood Risk and Drainage [APP-045].</p> <p>13. The Applicant acknowledges that this comment is extracted from Paragraph 10.6.6 of C6.2.10 ES Chapter 10_Hydrology Flood Risk and Drainage [APP-045].</p> <p>14. The Applicant acknowledges that this comment is extracted from Paragraphs 10.6.10 and 10.6.12 of C6.2.10 ES Chapter 10_Hydrology Flood Risk and Drainage [APP-045].</p> <p>15. The Applicant acknowledges that this comment is extracted from Paragraph 10.6.13 of C6.2.10 ES Chapter 10_Hydrology Flood Risk and Drainage [APP-045].</p> <p>16. The Applicant acknowledges that this comment is extracted from Paragraph 10.6.16 of C6.2.10 ES Chapter 10_Hydrology Flood Risk and Drainage [APP-045].</p> <p>17. The Applicant acknowledges that this comment is extracted from Paragraphs 10.8.2 and 10.8.5 of C6.2.10 ES Chapter 10_Hydrology Flood Risk and Drainage [APP-045].</p> <p>The Applicant reiterates that the identified negative impacts during the construction and decommissioning phases will be mitigated through the implementation of an approved CEMP.</p> <p>The Scheme, through the C3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C], provides (in Requirement 13 of Schedule 2) that "No part of the authorised development may commence until a construction environmental management plan for that part has been 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 environmental management plan must be substantially in accordance with the outline construction environmental management plan."</p>

LIR Ref.	Summary	Applicant's Response
	<p>16. <i>The sensitivity of surface water to inappropriate wastewater disposal from welfare facilities is considered to be Medium. Construction / Decommissioning foul water will not be discharged into a watercourse under any circumstances and therefore the magnitude of impact and significance of this effect is considered to be Negligible.</i></p> <p>17. <i>Following implementation of the proposed mitigation the residual effect is considered to be Negligible for all negative impacts."</i></p>	
<p>WLDC 17.18 WLDC 17.19</p>	<p>WLDC has identified no positive and no neutral impacts during operation.</p>	<p>The Applicant acknowledges these comments.</p>
<p>WLDC 17.20 WLDC 17.21 WLDC 17.22 WLDC 17.23 WLDC 17.24 WLDC 17.25 WLDC 17.26</p>	<p>WLDC identify the following negative impacts during operation:</p> <ol style="list-style-type: none"> 1. <i>"Given the nature of the Scheme, the increase in permanent impermeable area on the Site will be negligible, however equipment such as the proposed substations and energy storage areas will generate increased surface water runoff when compared to the current use of the Site. This could potentially increase localised pluvial flooding on the Site, as well as increase flood risk to people and property in the immediate surrounding area and downstream. The sensitivity of people and property is considered Medium. Whilst the effects would be temporary and short term, this is considered to have an effect of Medium Adverse magnitude to people and property as it could occur at time of high flood risk (e.g. during a large storm event). The significance of effect is Major Adverse.</i> 2. <i>An increase in the volume of water discharged to local watercourses has the potential to increase the flood risk to areas downstream of the Scheme. The sensitivity of people and property is considered Medium. Whilst the effects would be temporary and short term, this is considered to have an effect of Medium Adverse magnitude to people and property (considered to be up to very high importance) occurring at time of high flood risk (e.g. during a large storm event) due to the potential risks and hazard (loss of life) and the potential economic damages. Therefore the significance of effect is Major Adverse.</i> 3. <i>Urban runoff from the Site, along with the associated infrastructure, could contain diffuse urban pollutants such as hydrocarbons, heavy metals, and nutrients as well as debris and silt which could ultimately be discharged to the nearby watercourses via surface water runoff or infiltrate to ground. Without mitigation this could have a moderate adverse effect on water quality.</i> 4. <i>Given the nature of the Scheme there is a potential risk of fire which may negatively effect upon the local water environment. Runoff from the Site, along with the associated infrastructure, following a fire could contain diffuse urban pollutants such as hydrocarbons, heavy metals, as well as debris and silt which could ultimately be discharged to the nearby watercourses via surface water runoff or infiltrate to ground. Without mitigation this could have a moderate adverse effect on water quality.</i> 5. <i>Traffic on existing roads to and from the Site will increase albeit negligibly as a result of the Scheme. Any increase in traffic flows could lead to the introduction of new sources (or changed discharges) of highway runoff into receiving watercourses. Surface water runoff from roads can contain pollutants such as hydrocarbons, heavy metals and</i> 	<p>The Applicant responds to the following issues regarding Hydrology, Flood Risk, and Drainage during operation:</p> <ol style="list-style-type: none"> 1. The Applicant acknowledges that this comment is extracted from Paragraph 10.6.17 of C6.2.10 ES Chapter 10_Hydrology Flood Risk and Drainage [APP-045]. 2. The Applicant acknowledges that this comment is extracted from Paragraph 10.6.19 and 10.6.20 of C6.2.10 ES Chapter 10_Hydrology Flood Risk and Drainage [APP-045]. 3. The Applicant acknowledges that this comment is extracted from Paragraph 10.6.24 of C6.2.10 ES Chapter 10_Hydrology Flood Risk and Drainage [APP-045]. 4. The Applicant acknowledges that this comment is extracted from Paragraph 10.6.26 of C6.2.10 ES Chapter 10_Hydrology Flood Risk and Drainage [APP-045]. 5. The Applicant acknowledges that this comment is extracted from Paragraph 10.6.28 of C6.2.10 ES Chapter 10_Hydrology Flood Risk and Drainage [APP-045]. 6. The Applicant acknowledges that this comment is extracted from Paragraph 10.6.3 of C6.2.30 and 10.6.31 ES Chapter 10_Hydrology Flood Risk and Drainage [APP-045]. 7. The Applicant acknowledges that this comment is extracted from Paragraph 10.8.33 of C6.2.10 ES Chapter 10_Hydrology Flood Risk and Drainage [APP-045].

LIR Ref.	Summary	Applicant's Response
	<p><i>inert particulates which can cause chronic pollution of the water environment if allowed to enter watercourses without the appropriate treatment.</i></p> <p>6. <i>Spillages of pollutants (e.g. oil) on highways can be transported to watercourses via runoff, where they could impact upon ecological life, or infiltrate to ground. The receptors at risk are surface watercourses and groundwater bodies which are considered to be of Medium Sensitivity. Without mitigation the increase in highway spillage risk is considered to have an effect of a Low Adverse magnitude. The significance of effect is Minor Adverse.</i></p> <p>7. <i>Following implementation of the proposed mitigation the residual effect is considered to be Negligible for all negative impacts."</i></p>	
WLDC 21.9	<p>WLDC identifies the following neutral impact:</p> <p><i>"The vulnerability of the Scheme to flooding has been mitigated through embedded design measures to avoid building critical infrastructure in areas where there is a greater than 1 in 1,000 annual probability of flood risk. Elsewhere on the Sites, where works are able to be built compatibly with flooding of up to a depth of 1m, the vulnerability of construction workers and equipment is mitigated through embedded measures through the Outline Construction Environmental Management Plan [EN010133/APP/C7.1]. These include the requirement for contractors to produce a Flood Risk Management Action Plan/Method Statement which will provide details of the response to an impending flood and include the following. These measures are to be secured through Requirement in the DCO."</i></p>	<p>The Applicant acknowledges and agrees with these comments.</p>
WLDC 23.23	<p>WLDC summarises on Hydrology, Flood Risk and Drainage:</p> <p><i>"There is a potential for several impacts from the Scheme where the cable corridor crosses the River Trent, Seymour Drain, Marton Drain and several unnamed watercourses. The ES states that Grid Connection Corridor will be constructed beneath the channels of the watercourses via HDD techniques. This therefore causes there to be a potential impact to the water quality of the watercourses."</i></p>	<p>The Applicant respectfully disagrees with WLDC's summary.</p> <p>The Applicant notes Horizontal Directional Drilling (HDD) is considered within Section 2.10 'Other Considerations' of C6.3.10.2 ES Appendix 10.1 Annex B 10.1.1 Cable Route [APP-091]</p> <p>The Applicant notes the described parameters of the HDD across the River Trent, where the maximum depth of HDD has been set out at 25m (see para. 4.5.44 of C6.2.4_A ES Chapter 4 Scheme Description Revision A [REP-012]).</p> <p>As explained within paragraph 4.5.44 of C6.2.4_A ES Chapter 4 Scheme Description Revision A [REP-012], the maximum HDD depth of 25m below ground level has taken account of the River Trent water surface level being up to 6 metres below the river bank level; the surface water level being up to 5 metres deep to the silt level and the silt level likely being 1 metre deep before the river bed level. With the average depths for a HDD being 3m below the river bed level this leads to an assumed HDD at 15 meters below river bank level. The maximum HDD depth of 25 metres below ground level is considered to offer some flexibility to account for variation in depths. Since submission of the application, protective provisions have been agreed with the Canal and River Trust regarding the River Trent, which state that the HDD must be at a distance of at least 5m below the river bed. These protective provisions are incorporated into C3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C]</p> <p>No further concerns were raised by the Environment Agency or the Upper Witham Internal Drainage Board with regards to HDD as evidenced in C8.3.8 Environment Agency Statement of Common Ground (Draft)[REP-069] & C8.3.7 Upper Witham Internal Drainage Board Statement of Common Ground [REP-068].</p> <p>Given the parameters discussed above there will be no interaction between the watercourses and HDD works. Therefore, the potential impact to the water quality of the watercourses resulting from the HDD works is considered to be negligible and appropriately mitigated through the construction environmental management</p>

LIR Ref.	Summary	Applicant's Response
		plan delivered through C3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C], (in Requirement 13 of Schedule 2)
Landscape and Visual Impact		
BDC pg.14	Local area characteristics such as urban and landscape qualities and nature conservation sites have been discussed in the above policy section. The examiner is requested to seek views from the statutory bodies including Notts County Council, Notts Wildlife Trust, Natural England and Environment Agency on these topic areas.	The Applicant acknowledges this comment. C6.2.8_A ES Chapter 8 Landscape and Visual Impact Assessment Revision A [EN010133/EX2/C6.2.8_A] (the 'LVIA') has taken into consideration the comments received from the statutory bodies including Natural England and the Environment Agency Mitigation. Please refer to Section 8.2 and Appendix 8.4 of the LVIA [APP-076]. Detailed overlap and consultation between the LVIA topic and the Ecology topic has also been undertaken when developing the landscape and visual baseline and in identifying landscape and visual effects and mitigation for the assessment.
LCC 7.9	LCC raise concerns regarding inconsistencies between the Draft Development Consent Order and the Landscape and Visual Impact Assessment (LVIA) report. 1. The LVIA's intention is to retain and enhance trees and hedgerows, however, the draft DCO is seeking permission to have the ability to remove all hedgerows and trees within the redline to facilitate the development. 2. The extend of tree and hedgerow removal should be more proportionally set out in the DCO rather than including the full length of every hedgerow. This extend of vegetation removal is unacceptable and is not captures in any vegetation removal plans of the LVIA. 3. <i>"the LVIA is utilising the Rochdale Envelope approach, so the 'worst case', based on the Draft DCO and permission to remove extensive hedgerows and trees, would likely be an assessment with little or no retained existing vegetation within the site redline."</i>	The Applicant respectfully disagrees with the assertion that there are inconsistencies between the Draft Development Consent Order and the Landscape and Visual Impact Assessment (LVIA). The Applicant refers LCC 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], specifically agenda item 5s and the response to action point 7. The powers set out in Articles 38 and 39 of C3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C] to fell and lop trees and remove hedgerows are deliberately broad as the detailed design for the Scheme is not known at this stage. Whilst the Applicant has applied for the power to remove any part of the hedgerows within the Order Limits and listed in Schedule 13 to the DCO, this power is controlled and limited by the management plans secured by the Requirements. The Applicant has amended Article 38 to make it clear that the powers must be exercised in accordance with the Landscape and Environmental Management Plan approved pursuant to Requirement 7. In addition, Schedule 13 has been amended to make it clear that it is only "part of" the hedgerow (and not the whole of it) that is to be removed. In response to comments made by the ExA and by Interested Parties at both ISH1 and OFH1, the Applicant has produced Hedgerow Removal Plans [REP-045] providing indicative details of the hedgerows that are currently proposed to be removed temporarily to facilitate the construction of the Scheme and those that are currently proposed to be removed during the occupational life of the Scheme. This is appended to the Outline Landscape and Ecological Management Plan submitted at Deadline 1 [EX1/C7.3_A]. The final Landscape and Ecological Management Plan that is secured through Requirement 7 of the DCO will need to set out the final details for hedgerow removal and will be approved by the relevant planning authority.
LCC 7.10	<i>"The LVIA and the associated figures, appendices and documents together are a large set of work that provides a very detailed analysis of the development and its impact upon the baseline landscape and visual conditions of the site and surrounding area. However, the volume of information and a lack of clear, overarching narrative and summary result in making the detailed information inaccessible and often difficult to follow."</i>	The Applicant has submitted a summary and narrative of effects at Deadline 1 as set out in C8.2.1 Supplementary Landscape Effects Tables [REP-060], C8.2.2 Supplementary Visual Effects Tables [REP-061], and the Hedgerow Removal Plans in Appendix C of C7.3_A Outline Landscape and Ecological Management Plan Revision A [REP-045] which summarise the main findings of the LVIA. These supplementary tables have been produced to assist readers in understanding the conclusions of the LVIA, by setting out all of the significance of effect conclusions for all assessed landscape and visual receptors within accessible tables. .
LCC 7.11 LCC 7.14	LCC raise the following issues with the Landscape and Visual Impact Assessment: 1. <i>"By reason of its mass and scale, the assessment is that the Development would lead to significant adverse effects on landscape character and visual amenity at all phases of</i>	The Applicant acknowledges these comments and responds in turn: 1.The Landscape and Visual Impact Assessment (LVIA) contained within C6.2.8_A ES Chapter 8 Landscape and Visual Impact Assessment Revision A [EN010133/EX2/C6.2.8_A] takes into account the effects on the landscape

LIR Ref.	Summary	Applicant's Response
LCC 7.18	<p><i>the scheme (construction, operation year 1, operation year 15, and decommissioning). The Development has the potential to transform the local landscape by altering the character on a large scale. This landscape change also has the potential to affect wider landscape character, at a regional scale, by replacing large areas of agricultural or rural land with solar development, affecting the current open agricultural character that is identified as key defining characteristics of the area."</i></p> <ol style="list-style-type: none"> 2. <i>"The justification for the benefits is predominantly reliant upon landscape benefits, not visual – the scheme does not improve or enhance the view, and generally does not screen or integrate existing visual detractors."</i> 3. <i>"The LVIA needs to clearly express the authors judgement about changes to the landscape and views from the implementation of the development, which is currently missing as it is contained within multiple sources relying on the reader cross referencing multiple appendices and other ES chapters and parts of the DCO application."</i> 4. <i>"The main LVIA chapter would benefit from being reduced in size and furnished with a clear and concise written summary of the findings. In particular, it would be useful to have the identification and clear explanation of which aspects of landscape and visual change are more important, which are not, and why they are. This should be clearly laid out using plain, easy to understand language."</i> 	<p>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 [REP-020] which includes 8.2.1-8.2.12. These associated appendices provide a detailed assessment of landscape effects on each landscape receptor.</p> <p>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].</p> <p>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_A to 8.16.10_A) [REP-024 to REP-0346.2] 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 effects of 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 will be implemented and managed to ensure the effectiveness and certainty in achieving the objectives.</p> <p>2. The LVIA identifies the Scheme as causing a significant change to high and medium sensitivity receptors. The effects on several close-range views have been assessed as beneficial. For example, within the Cottam 3 Site, the PRoW footpath (Pilh/20/1) which connects at the junction with Bonsdale Lane. This is set out in C6.3.8.3 ES Appendix 8.3 Assessment of Potential Visual Effects [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 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.</p> <p>The likely significant beneficial and adverse visual effects from the assessed viewpoint receptors, during construction, operation (year 1), operation (year 15) and decommissioning of the Scheme, are set out within the detailed receptor sheets in C6.3.8.3 ES Appendix 8.3 Assessment of Potential Visual Effects [EN010133/EX2/C6.3.8.3_A].</p> <p>3. The Applicant has submitted a summary and narrative of effects at Deadline 1 as set out in C8.2.1 Supplementary Landscape Effects Tables [REP-060], C8.2.2 Supplementary Visual Effects Tables [REP-061], and the Hedgerow Removal Plans in Appendix C of C7.3_A Outline Landscape and Ecological Management Plan Revision A [REP-045] which summarise the main findings of the LVIA. These supplementary tables have been produced to assist readers in understanding the conclusions of the LVIA, by setting out all of the significance of effect conclusions for all assessed landscape and visual receptors within accessible tables.</p> <p>4. The Applicant has submitted a summary and narrative of effects at Deadline 1 as set out in bullet point 3 above.</p>
LCC 7.12 LCC 7.13 LCC Appx B	<p>LCC identify inconsistencies in the LVIA as follows:</p> <ol style="list-style-type: none"> 1. Regarding judgements on Landscape effects in the LVIA, there are some inconsistencies identified in paragraph 4.9 of the Appendix B. These need to be clarified as they relate to the identification of significant effects. However, some of the findings of the landscape assessment are not agreed and do not see any appropriate justification for assessing significant beneficial landscape effects on both landscape character areas, or individual contributors to landscape character by the construction and operation of a large solar development. There are also 	<p>The Applicant acknowledges these comments and responds in turn:</p> <ol style="list-style-type: none"> 1. The Applicant respectfully disagrees with this statement. The justification of beneficial effects is set out in C6.3.8.2 ES Appendix 8.2 Assessment of Potential Landscape Effects [REP-020]. 2. The Applicant respectfully disagrees with this statement. The justification for the improvement of the views over the baseline is set out in C6.3.8.3 ES Appendix 8.3 Assessment of Potential Visual Effects [EN010133/EX2/C6.3.8.3_A]. <p>We assume the comment on inconsistencies in the LVIA is referring to Paragraphs 4.9 and 5.9 of the Appendix B. The Applicant has submitted an update at Deadline 2 as set out in C8.2.1_A Supplementary Landscape Effects</p>

LIR Ref.	Summary	Applicant's Response
	<p>several minor beneficial effects (not significant) identified, predominantly at the Operation (Year 1) phase of the development, that also lack justification..</p> <p>2. Regarding judgements on Visual effects in the LVIA, there are some inconsistencies identified in paragraph 5.9 of the Appendix B. These need to be clarified as they relate to the identification of significant effects. It is not agreed with the findings of the LVIA that any of the views would be improved over the baseline by the implementation of a large scale solar development across an open agricultural landscape. As well as the 15 views assessed as having residual significant beneficial effects, several others have been assessed as having minor beneficial..</p>	<p>Tables [REP-060], C8.2.2_A Supplementary Visual Effects Tables [EN010133/EX2/C8.2.2_A], C6.3.8.2_B Appendix 8.2 Assessment of Potential Landscape Effects Revision B [REP-020], C6.3.8.3 Appendix 8.3 Assessment of Potential Visual Effects Revision A [EN010133/EX2/C6.3.8.3_A].</p> <p>.</p> <p>.</p> <p>The LVIA Chapter [APP-043] is being updated as Revision A [EN010133/EX2/C6.2.8_A] at Deadline 2 to resolve these errors.</p> <p>With regard to the comment on neutral effects and viewpoint VP20 at Paragraph 5.9 of Appendix B, the Applicant respectfully disagrees. The use of 'moderate neutral' or 'moderate-minor neutral' is consistent with the agreed methodology at C6.3.8.1 ES Appendix 8.1 LVIA Methodology [APP-068]. The methodology sets out (with regard to nature of effects) at Paragraph 1.1.88 that "Neutral effects occur where a development neither contributes to nor detracts from the landscape and visual resource or where the effects are so limited that the change is hardly noticeable. A change to the landscape and visual resource is not considered to be adverse simply because it constitutes an alteration to the existing situation;"</p> <p>For the examples below, please refer to C6.3.8.3 ES Appendix 8.3 Assessment of Potential Visual Effects [EN010133/EX2/C6.3.8.3_A].</p> <p>With Viewpoint VP6 [Sheet C6.3.8.3.2.3.29] the 'In-Combination Effects (Cumulative Sites)' will yield minor-moderate neutral effects between Cottam 3a and 3b Sites. This is where the decommissioning changes will not be readily noticeable due to landscape becoming more enclosed since all the hedgerows will have been managed to grow out to a height of 5m, new planting will have established with scattered trees beginning to provide some good cover and proposed hedges and scrub planting will have established. In this instance the decommissioning changes will neither contribute nor detract from the landscape when compared to the construction stage where mitigation planting is not present.</p> <p>With Residential Receptor R33 [Sheet C6.3.8.3.2.1] the effects at Operation (Year 15) will yield minor-moderate neutral effects. This is where the proposed mitigation relates to the visibility to the north, south, west and east over the Cottam 2 Site from the first floor of the property where the windows are mainly south focused. All planting areas will be offset to a maximum of 50m from the property boundary and will comprise native shelterbelt to the north and east and a native hedge with irregularly spaced hedgerow trees to the south and west. In this instance the changes will neither contribute nor detract from the landscape since such a decision may be subjective and may depend on the individual property owner's perspective and priorities.</p>
LCC 7.15	<p><i>"It is also concluded that the cumulative landscape and visual effects of the Development will also bring about significant landscape and visual effects, particularly when assessed alongside the proposed Gate Burton, West Burton and Tillbridge Solar schemes. The mass and scale of these projects combined would lead to adverse effects on landscape character and visual amenity over an extensive area. The landscape character of the local, and potentially regional area, may be changed completely, particularly when experienced sequentially while travelling through the landscape."</i></p>	<p>The Applicant respectfully disagrees with LCC's comments and considers the approach taken and subsequent conclusions regarding assessing the impacts of the Scheme alongside the proposed Gate Burton, West Burton and Tillbridge Solar proposals is robust. The assessment has concluded that the effects of Scheme, when assessed cumulatively with the effects of the other local projects, will not result in significant adverse effects on landscape character and visual amenity over an extensive area. For some receptors, in localised areas, at the construction stage and assessment year 1, Significant adverse effects have been identified. The assessment of potential cumulative landscape effects is set out in detail within C6.3.8.2 ES Appendix 8.2 Assessment of Potential Landscape Effects. This includes 8.2.1-8.2.12 [REP-020] of the assessment where the effects of the Tillbridge proposals are considered cumulatively with the effects of the Cottam 1 North Site. The boundaries of the two schemes are located directly adjacent to each other, just south of Kexby Road and to the west of the settlement of</p>

LIR Ref.	Summary	Applicant's Response
		<p>Fillingham. The assessment takes account of those travelling along the regularly used routes such as major roads or popular paths.</p> <p>The cumulative effects with the Gate Burton proposals are illustrated on C6.4.8.15.2.6 ES Figure 8.15.2.6 Gate Burton Cumulative Developments Cottam 1, 2 and 3a and 3b Augmented ZTV [APP-300], The settlements of Willingham by Stow, Kexby and Upton provide screening and separation between Gate Burton and the Cottam 1 Site. In respect of the Cottam 2 Site, the distance between Gate Burton and this particular site is approximately 6km, while the separation distance between Gate Burton and Cottam 3a and 3b Sites is approximately 9km. Cumulative effects between the projects would therefore not occur due to the significant distance between them.</p> <p>The cumulative effects with the West Burton proposals are illustrated on C6.4.8.15.2.9 ES Figure 8.15.2.9 West Burton Cumulative Developments Cottam 1, 2 and 3a and 3b Augmented ZTV [APP-303]. The settlements of Sturton by Stow, Bransby and Broxholme provide screening and separation between West Burton and the Cottam 1 Site. In respect of the Cottam 2 Site, the distance between West Burton and this particular site is approximately 10km, while the separation distance between West Burton and Cottam 3a and 3b Sites is approximately 14km. Cumulative effects of between the projects would therefore not occur due to the significant distance between them.</p> <p>The cumulative effects with the Tillbridge proposals are illustrated on C6.4.8.15.2.8 ES Figure 8.15.2.8 Tillbridge Cumulative Developments Cottam 1, 2 and 3a and 3b Augmented ZTV [APP-302], the Tillbridge proposals are located to the west and east of the settlement of Springthorpe and situated between the settlements of Heapham, Hemswell Cliff and Glentworth.</p> <p>The Cottam 1 Site and Tillbridge boundaries are located adjacent to each other. Cumulative effects of these two proposals have identified potential significant cumulative adverse effects predicted during the construction phase and operational phase (Year 1).</p> <p>The Cottam 2 Site and Tillbridge boundaries are located in close proximity to each other, with Corringham Road in between. Cumulative effects of these two proposals have identified potential significant cumulative adverse effects predicted during the construction phase and operational phase (Year 1).</p> <p>The Cottam 3a and 3b Sites and Tillbridge proposals have identified potential significant cumulative adverse effects predicted during the construction phase and operational phase (Year 1).</p> <p>Section 8.10, Cumulative Effects, of C6.2.8_A ES Chapter 8 Landscape and Visual Impact Assessment Revision A [EN010133/EX2/C6.2.8_A] provides a summary of the findings with detail set out within the individual receptor sheets within C6.3.8.2 ES Appendix 8.2 Assessment of Potential Landscape Effects [REP-020] and C6.3.8.3 ES Appendix 8.3 Assessment of Potential Visual Effects [EN010133/EX2/C6.3.8.3_A].</p> <p>The effects of the Schemes Sites cumulatively are shown on C6.4.8.15.1 Figure 8.15.1 Cottam 1,2 and 3 Cumulative Sites 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].</p> <p>All sites and development included within the cumulative assessment have been discussed and agreed with the host local authorities, including LCC during the LVIA Workshops. Detail of 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,</p>

LIR Ref.	Summary	Applicant's Response
		<p>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].</p> <p>The mitigation proposals associated with the landscape and visual receptors for the Scheme are included in C7.3_B Outline Landscape and Ecological Management Plan [EN010133/EX2/C7.3_B], and within C6.4.8.16.1_A-C6.4.8.16.10_A Landscape and Ecology Mitigation and Enhancement Plans (Figures 8.16.1_A to 8.16.10_A) [REP-024 to REP-034]. 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 aimed at benefitting the community as a whole, including 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.</p>
<p>LCC 7.16 LCC 7.17</p>	<p>LCC have set out the following details relating to landscaping:</p> <ol style="list-style-type: none"> Any tree and vegetation removal associated with the development, including highways improvements and access for construction, must be clarified and any works (such as lopping or pruning) must be agreed prior to any works commencing. If the Scheme succeeds, more detailed plans including <i>detail of the areas of landscape mitigation, location and types of planting (species), as well as number, density and specification</i> must be provided prior to any works commencing. The mitigation illustrated on the relevant figures has been utilised to assess the landscape and visual effects of the scheme, therefore we would expect any detailed landscape proposals consist of the area and extent shown on these plans as a minimum. 	<p>The Applicant acknowledges these comments and responds in turn:</p> <ol style="list-style-type: none"> The LVIA's intention is to retain and enhance trees and hedgerows and C7.3_B Outline Landscape and Ecological Management Plan Revision B [EN010133/EX2/C7.3_B] sets out in paragraph 1.1.5 that wherever feasible, the Scheme utilises existing access points to accommodate internal access between fields, land areas, solar panel areas, substation sites and battery storage areas. The extent of tree and hedgerow removal required for the Scheme is therefore considered to be proportionate. However, in certain locations where existing access points do not exist some minor hedgerow works (pruning and removal) is required, as set out in Appendix C – Hedgerow Removal Plans of the OLEMP. Any minor hedgerow works (pruning and removal) associated with the Scheme, including highways improvements and access for construction, will be clarified and any works (such as lopping or pruning) will be agreed prior to any works commencing. Following further development of the Scheme, more detailed planting plans including detail of areas of landscape mitigation, location and types of planting (species), as well as number, density and specification will be provided prior to any works commencing. The detailed landscape proposals will consist of the area and extent of the Scheme shown on C6.4.8.16.1_A - C6.4.8.16.10_A Landscape and Ecology Mitigation and Enhancement Plans (Figures 8.16.1_A to 8.16.10_A) [REP-024 to REP-034].
<p>LCC 7.19</p>	<p><i>"It is therefore concluded that the development will cause negative impacts on the landscape character both individually and also negative impacts due to the cumulative impacts with the other solar projects in the area namely Gate Burton, West Burton and Tillbridge."</i></p>	<p>The Applicant respectfully disagrees with LCC's comments. Please refer to comments LCC 7.15 and LCC 7.11 above.</p>
<p>LCC Appx B</p>	<p>AAH Consultants has been commissioned by LCC to provide an independent review of Landscape and Visual elements of the Cottam Solar Project DCO, including a focused review of the LVIA chapter of the Environmental Statement. This review includes conclusions on the suitability of the LVIA.</p>	<p>The Applicant acknowledges this comment.</p>
<p>WLDC 7.1.1</p>	<p>WLDC raise the following issues with the Landscape and Visual Assessment and methodology:</p> <ol style="list-style-type: none"> The Zone of Theoretical Visibility (ZTV) models use DTM supplemented with separately derived site data rather than Digital Surface Model (DSM) so there is potential for error. Several impacts during construction and operation are considered not significant or beneficial which differs from the Gate Burton adverse impact assessment despite having a smaller footprint. Limited assessment in relation to the impact on road users. 	<p>The Applicant acknowledges these comments and responds in turn:</p> <ol style="list-style-type: none"> The ZTV Methodology is undertaken in accordance with C6.3.8.1 ES Appendix 8.1 LVIA Methodology [APP-068] that was agreed with LCC at the series of workshops as set out in C6.3.8.4 ES Appendix 8.4 Consultation [APP-076]. Each impact assessment approached independently, and different impact assessments can reach different conclusions. This difference can be due to the specific characteristics of the Site for example the topography and vegetation cover. The difference in footprint and showing less significant or beneficial impact could be attributed to the differences in mitigation measures, construction methods, the design and layout of the project or the materials used.

LIR Ref.	Summary	Applicant's Response
	<ol style="list-style-type: none"> 4. Paragraph 18.7.112 of the Socio-economic chapter [EN010133/APP/C6.2.18] contradicts the findings of the LVIA. 5. Unclear how the Applicant has reached their conclusion, particularly as the landscape receptors are subdivided and an overall impact on the landscape does not appear to be forthcoming. 6. The assessment does not address the negative impact to landscape character that would occur from the introduction of industrial elements. 7. The design of the Scheme seems sporadic and a piecemeal approach has been taken designing the Scheme. 8. Each site requires an electrical substation. This is recognised in the LVIA as having likely significant in-combination landscape effects at the construction and operation (Year 1) for the substation generating stations at Cottam 1 (West A and B), Cottam 2, Cottam 3a and 3b Sites. These effects would be Adverse with a Moderate significance of effect. The presence of the substations will remain evident in the landscape as a prominent feature. If the Scheme's design was contiguous in nature, there would be no need for several substations. 9. Planting to screen the development is unlikely to exclude all evidence of the development. Planting may help reinforce the woodland features of 'Wooded Vales', but the open nature of the wider agricultural Page 53 landscape is a key characteristic – extensive planting in areas that are otherwise open agricultural landscapes would not necessarily be in keeping and may obscure these views. 10. The solar panels/arrays are clearly the most intrusive elements – it is accepted that the impact of the grid connection itself may be minimal if cables are buried and features re-established (hedgerows etc), but this planting will take time to establish – especially if it is re-disturbed by consecutive solar farms. 11. The Beneficial effects in relation to Nationally and Locally Designated Landscape and Ancient Woodlands and Natural Designations are not justified [C6.2.8 page 241 onwards]. 12. Impacts will be of long-duration 40 years plus (which could be two generations). Although impacts are reversible, they are not short-term. 13. Cumulative Effects have been considered but appear to be on an incremental basis only. All 7 of the proposed solar farms considered would be seen in views from many locations along the cliff. 14. Neither this assessment nor others consider how many solar projects or which combination of projects would be 'acceptable' and the least likely to be damaging/intrusive on the landscape character and views. 	<ol style="list-style-type: none"> 3. The LVIA has provided a full independent assessment of road users as set out on the individual receptor sheets at Appendix C6.3.8.3 ES Appendix 8.3 Assessment of Potential Visual Effects [EN010133/EX2/C6.3.8.3_A]. 4. The Applicant refers to the response made to WLDC 22.5 in the previous "Cumulative Effects" section of this table. 5. The landscape receptors are sub-divided into individual receptors to provide a fine-grained assessment and this approach was agreed with LCC at a series of workshops to ensure full clarity and comprehensiveness across the assessment at this scale. With regard to the broad grained scale, the conclusions of the assessment for the impact on the landscape are set within the individual receptor sheets at C6.3.8.2 ES Appendix 8.2 Assessment of Potential Landscape Effects [REP-020] and this approach was agreed with LCC. 6. 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, fencing and substations. Please refer to the individual receptor sheets at C6.3.8.2 ES Appendix 8.2 Assessment of Potential Landscape Effects [REP-020]. If WLDC could provide the specifics of their concern the Applicant would welcome more clarity. 7. The Applicant respectfully disagrees. 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_A Outline Landscape and Ecological Management Plan [REP-045] and 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) [REP-024 to REP-034] 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. 8. The assessment of each of the substations is set out within the LVIA Chapter [C6.2.8_A ES Chapter 8 Landscape and Visual Impact Assessment Revision A [EN010133/EX2/C6.2.8_A]] within the detailed landscape receptor sheets at Appendix 8.2.12 [REP-020] and visual receptor sheets Appendix 8.3 [EN010133/EX2/C6.3.8.3_A]. The LVIA reaches conclusions on the in-combination of the four substations at paragraph 8.9.10 predicting that the landscape effects will be moderate adverse and likely significant at the construction stage. With regard to visual effects, the LVIA concludes that there are likely significant effects at the construction stage at up to 30 viewpoints when combined with noise and dust effects. Please refer to paragraph 8.9.14. The proposed planting is unlikely to completely obscure all aspects of the Scheme, but the effectiveness whether as a screening or softening measure is set out in the individual receptor sheets at C6.3.8.3 ES Appendix 8.3 Assessment of Potential Visual Effects [EN010133/EX2/C6.3.8.3_A]. The proposed planting has been carefully designed to be in keeping with the landscape character and avoid impeding key views across the landscape. 9. The LVIA has taken account of the visual impact of the solar panels/arrays and explored all options for minimising any effects and this is set out within C6.3.8.3 ES Appendix 8.3 Assessment of Potential Visual Effects [EN010133/EX2/C6.3.8.3_A]. The Applicant agrees with WLDC's comment that the impact of the grid connection itself will be minimal if cables are buried. The assessment has taken into account the planting through the project life cycle guided by Paragraphs 3.18, 4.1, 4.16, 4.20 and 4.28 of GLVIA3 and accordance with the methodology agreed with LCC.

LIR Ref.	Summary	Applicant's Response
		<p>10. The Applicant respectfully disagrees. Please refer to the individual receptor sheets at C6.3.8.2 ES Appendix 8.2 Assessment of Potential Landscape Effects [REP-020].</p> <p>11. The LVIA considers the potential long-term effects of the Scheme on 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 GLVIA3 and the LVIA methodology agreed with LCC.</p> <p>12. The Applicant respectfully disagrees. The LVIA has taken into consideration other solar projects at Bumble Bee Farm, Field Farm, Gate Burton, High Marnham, Tillbridge and West Burton. Please refer to comment LCC 7.15 above.</p> <p>13. The LVIA [EN010133/EX2/C6.2.8_A] includes a cumulative effects assessment in line with The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and National Infrastructure Planning Advice Note Seventeen: Cumulative Effects Assessment .</p>
<p>WLDC 7.12 WLDC 7.13 WLDC 7.14 WLDC 7.15 WLDC 7.16 WLDC 7.17</p>	<p>WLDC considers there to be no positive impacts during construction.</p> <p>WLDC considers there to be a neutral impact during construction on National Landscape Character Areas, Regional Landscape Character Areas, Topography and Watercourses, Nationally and Locally Designated Landscapes, and Combined Landscape Effects of Four Site Areas.</p>	<p>The Applicant acknowledges these comments and responds in turn:</p> <ol style="list-style-type: none"> 1. Please refer to the C7.1_B Outline Construction Environmental Management Plan Revision B [EN010133/EX2/C7.1_B] that sets out the allocated measures, responsibilities, procedures and requirements designed to manage the Scheme's construction and general site arrangements. C6.2.8_A ES Chapter 8 Landscape and Visual Impact Assessment Revision A [EN010133/EX2/C6.2.8_A] also sets out the construction effects of the Scheme on both the landscape and visual receptors, concluding there are potential significant adverse effects but that these are temporary in nature and short term. 2. The LVIA considers these construction impacts and reaches conclusions that neutral landscape effects will occur but that these effects will arise at varying stages through the life cycle of the Scheme. Please refer to C6.3.8.2 ES Appendix 8.2 Assessment of Potential Landscape Effects [REP-020].
<p>WLDC 7.18</p>	<p>WLDC identify the following combined negative effects of the Generating Substations during Construction:</p> <ol style="list-style-type: none"> 1. <i>"With the Viewpoint Receptors (Doc. Ref. EN010133/APP/C6.3.8.3.2.3) there is potential for likely Significant visual effects at the construction stage, in combination with noise and dust effects. The construction activities would be short-lived but would be a dominant feature in the context of these viewpoints. Effects would be Moderate, Moderate-Major and Major and would be Adverse, but of a short-term duration.</i> 2. <i>With the Residential Receptors [EN010133/APP/C6.3.8.3.2.3] shows that there is potential for likely Significant visual effects at the construction stage, in combination with noise and dust effects. These effects apply to Receptors R33, R36, R61, R62, R63A, R63B, R67 and R73. Effects would be Moderate-Major and would be Adverse, but of a short-term duration.</i> 3. <i>With the Transport Receptors, Appendix 8.3.4.2 [EN010133/APP/C6.3.8.3.4.2] shows there is potential for likely Significant visual effects at the construction stage, in combination with noise and dust effects. These effects apply to Receptors T016, T019, T021, T040, T045, T072, T074, T099, T110, T119, T120, T122, T127 and T163. Effects would be Moderate and Moderate-Major and would be Adverse, but of a short-term duration.</i> 4. <i>With the PRow Receptors, Appendix 8.3.5.2 [EN010133/APP/C6.3.8.3.5.2] shows there is potential for likely Significant visual effects at the construction stage, in combination with noise and dust effects. These effects apply to Receptors Fill/86/1, Fill/767/1,</i> 	<p>The Applicant notes these comments and that WLDC are summarising paragraphs 8.9.14, 9.9.15, 8.9.16 and 8.9.17 of the LVIA Please refer to C6.2.8_A ES Chapter 8 Landscape and Visual Impact Assessment Revision A [EN010133/EX2/C6.2.8_A] (the 'LVIA') for the Viewpoint Receptors, Residential Receptors, Transport Receptors and PRow during the construction stage. The LVIA assessment concludes he potential effects are moderate-major adverse and moderate adverse. For the individual receptor sheets, please refer to C6.3.8.3 ES Appendix 8.3 Assessment of Potential Visual Effects [EN010133/EX2/C6.3.8.3_A].</p>

LIR Ref.	Summary	Applicant's Response
	<i>Pilh/20/1, Stow/83/1 and TFL/31/2. Effects would be Moderate-Major and would be Adverse, but of a short-term duration."</i>	
WLDC 7.19	<i>"With the Viewpoint Receptors, Appendix 8.4.3 [C6.8.3.4.3] shows there is overlap with the Cultural Heritage Topic Area and there is potential likely Significant visual effects in combination with effects to cultural heritage receptors at the construction stage from Viewpoints VP06 and LCC-C-J. Effects would be Moderate-Major and Major and would be Adverse at both the construction and operation (year 1) stages and so the implications on landscape mitigation are taken into specific consideration at these viewpoints."</i>	The Applicant notes these comments and that WLDC are summarising paragraph 8.9.18 of the LVIA. Please refer to C6.2.8_A ES Chapter 8 Landscape and Visual Impact Assessment Revision A [EN010133/EX2/C6.2.8_A] (the 'LVIA') for the Viewpoint Receptors VP06 and LCC-C-J. The LVIA predicts significant effects during the construction and operation stage (year 1) being moderate-major adverse, major-moderate adverse and moderate adverse. For the individual receptor sheets, please refer to C6.3.8.3 ES Appendix 8.3 Assessment of Potential Visual Effects [EN010133/EX2/C6.3.8.3_A].
WLDC 7.20	<i>"With Viewpoint Receptors, Appendix 8.3.2.3 [EN010133/APP/C6.3.8.3.2.3] shows that there is potential for likely Significant visual effects at the construction stage and this is taken into account with other works comprising the Scheme. There are Viewpoints within the 2km Study Area of the substation Sites that are likely to experience some minor changes in the wider landscape at the construction stage as a result of construction traffic, minor noise and disturbance. The following viewpoints would be potentially affected at the construction and operation (Year 1) stages and experience views of the substation resulting in Moderate-Major and Major effects that would be Adverse."</i>	The Applicant notes these comments and that WLDC are summarising paragraph 8.9.24 of the LVIA. Please refer to C6.2.8_A ES Chapter 8 Landscape and Visual Impact Assessment Revision A [EN010133/EX2/C6.2.8_A] (the 'LVIA') for the Viewpoint Receptors during the construction stage being moderate-major adverse and moderate adverse. For the individual receptor sheets, please refer to C6.3.8.3 ES Appendix 8.3 Assessment of Potential Visual Effects [EN010133/EX2/C6.3.8.3_A].
WLDC 7.21 WLDC 7.22 WLDC 7.23	WLDC considers there to be a positive impact during operation on Topography and Watercourses. WLDC considers there to be a neutral impact during operation on National Landscape Character Areas and Regional Landscape Character Areas.	The Applicant notes these comments. Please refer to C6.2.8_A ES Chapter 8 Landscape and Visual Impact Assessment Revision A [EN010133/EX2/C6.2.8_A] (the 'LVIA') and the individual receptor sheets C6.3.8.2 ES Appendix 8.2 Assessment of Potential Landscape Effects [REP-020]: 1. For Topography and Watercourses, the LVIA does not identify potential positive impacts during operation (Years 1 and 15). Instead, the potential effects are moderate-major adverse and moderate adverse for the Generating Substations and minor beneficial and moderate beneficial for the Sites and Cable Route Corridor. 2. For the National Landscape Character Areas, these are scoped out of the assessment since they are at large-scale and included to provide context only. For the Regional Character Areas, the potential effects during operation (Years 1 and 15) vary, ranging from moderate beneficial, minor beneficial to negligible neutral.
WLDC 7.24	WLDC considers there to be a negative impact during operation. <i>"There are likely significant in-combination landscape effects at the construction and operation (Year 1) stages for the substation generating stations at Cottam 1, West A, Cottam 1 West B, Cottam 2, Cottam 3a and 3b substation Sites. These effects would be Adverse with a Moderate significance of effect."</i>	The Applicant notes this comment and that WLDC are summarising paragraph 8.9.10 of C6.2.8_A ES Chapter 8 Landscape and Visual Impact Assessment Revision A [EN010133/EX2/C6.2.8_A].
WLDC 7.25 WLDC 7.26	<i>"The Applicant has assessed that the cumulative effects of the proposed solar farms within the vicinity of the Scheme, this includes Bumble Bee Farm, Field Farm, Gate Burton, High Marnham, Tillbridge and West Burton. The Applicant does not consider that there are any negative impacts on a cumulative scale and there would be an overall [sentence incomplete]"</i>	The Applicant responds in turn. Please refer to C6.2.8_A ES Chapter 8 Landscape and Visual Impact Assessment Revision A [EN010133/EX2/C6.2.8_A] (the 'LVIA') and the individual receptor sheets C6.3.8.2 ES Appendix 8.2 Assessment of Potential Landscape Effects [REP-020]: 1. The Applicant's position aligns with WLDC's comments. 2. The Applicant respectfully disagrees. Instead, there are potential cumulative landscape effects for the Sites and Cable Route Corridor and Generating Substations ranging from moderate adverse, minor adverse, minor beneficial, minor neutral, negligible beneficial to negligible neutral.

LIR Ref.	Summary	Applicant's Response
WLDC 7.27 WLDC 7.28	<p>WLDC considers there to be positive cumulative impacts.</p> <p><i>"There would not be the removal of, or changes in individual topography or watercourse elements or features of the landscape as a result of the addition of the Scheme with the Cumulative Developments. However, the topography and watercourse features within these areas are influenced by the intensive farming that has diminished the 'sense of place' in parts including the drainage of flood plains and impact on the riparian vegetation and other habitats.</i></p> <p><i>There would not be the removal of, or changes in individual Ancient Woodlands and Natural Designations features of the landscape as a result of the addition of the Scheme with the Cumulative Developments."</i></p>	<p>The Applicant responds in turn. Please refer to C6.2.8_A ES Chapter 8 Landscape and Visual Impact Assessment Revision A [EN010133/EX2/C6.2.8_A] (the 'LVIA') and the individual receptor sheets C6.3.8.2 ES Appendix 8.2 Assessment of Potential Landscape Effects [REP-020]:</p> <ol style="list-style-type: none"> 1. The Applicant respectfully disagrees. Instead, there are potential cumulative landscape effects for the Sites and Cable Route Corridor and Generating Substations ranging from moderate adverse, minor beneficial to minor neutral. 2. The Applicant's position aligns with WLDC comments.
WLDC 7.36	<p><i>"In summary, it has been assessed that there would be neutral [cumulative] impact on the following landscape receptors:</i></p> <ul style="list-style-type: none"> • Land use; • Communications and Infrastructure; • Settlements, Industry, Commerce and Leisure; • Public Rights of Way and Access; • Scheduled Monuments, Listed Buildings, Conservation Areas and Registered Parks and Gardens." 	<p>The Applicant's position aligns with WLDC's comments in respect to Gate Burton Energy Park, Tillbridge Solar and West Burton Solar Project at the decommissioning stage of the Scheme in that there will be neutral cumulative effects. Please refer to C6.2.8_A ES Chapter 8 Landscape and Visual Impact Assessment Revision A [EN010133/EX2/C6.2.8_A] (the 'LVIA') and the individual receptor sheets C6.3.8.2 ES Appendix 8.2 Assessment of Potential Landscape Effects [REP-020].</p>
WLDC Table 22-1	<ol style="list-style-type: none"> 1. <i>"It has been assessed that there would be neutral impact on the following landscape receptors: Land use; Communications and Infrastructure; Settlements, Industry, Commerce and Leisure; Public Rights of Way and Access; Scheduled Monuments, Listed Buildings, Conservation Areas and Registered Parks and Gardens;</i> 2. <i>It is assessed that there will be a beneficial effect with regards to the follow landscape receptors: Topography and watercourses; Nationally and Locally Designated Landscapes; and Ancient Woodlands and Natural Designations.</i> 3. <i>The Landscape and Visual Amenity chapter states that it has identified 'at worst Minor adverse effects on landscape during construction for the following projects: West Burton Solar Project, Cottam Solar Project, Cottam Power Station demolition, and Stow Park Road Residential Development'.</i> 4. <i>Furthermore, during the operational phase, it has been assessed that the cumulative effects from the Scheme and Cottam Solar Project or Tillbridge Solar Farm are considered Minor adverse. Cumulative effects with West Burton Solar Project are moderate adverse which is considered significant.</i> 5. <i>The cumulative landscape assessment in the Gate in the Gate Burton West Burton Solar Project, Cottam Solar Project, Tillbridge Solar Farm and the Scheme has as a combined cumulative impact on landscape of moderate adverse, which is considered significant. Given the proximity of the Scheme with these other solar projects, and the combined scale, the Applicant has worked in partnership to identify areas where projects can collaborate to manage environmental effects."</i> 	<p>The Applicant notes these comments and that WLDC are summarising paragraphs from the LVIA. Please refer to C6.2.8_A ES Chapter 8 Landscape and Visual Impact Assessment Revision A [EN010133/EX2/C6.2.8_A] (the 'LVIA') and the individual receptor sheets at C6.3.8.2 ES Appendix 8.2 Assessment of Potential Landscape Effects [REP-020] and C6.3.8.3 ES Appendix 8.3 Assessment of Potential Visual Effects [EN010133/EX2/C6.3.8.3_A], which sets out that:</p> <ol style="list-style-type: none"> 1. there are potential effects at the decommissioning stage of the Scheme and in respect to cumulative landscape effects at the decommissioning stage of the Scheme for Gate Burton Solar, Tillbridge Solar and West Burton Solar. 2. There are also beneficial effects in respect to Regional Scale Landscape Character, Settlement, Industry, Commerce and Leisure, Public Rights of Way and Access, Scheduled Monument and Listed Buildings, Conservation Areas and Registered Parks and Gardens. 3. With regard to cumulative effects during the operation stage with Gate Burton Energy Park, Tillbridge Solar and West Burton Solar Project there are potential moderate adverse landscape effects for the Generating Substations. The LVIA has not considered the Stow Park Road Residential Development in the assessment. 4. That during the operation stage, the potential cumulative effects for the Scheme and Tillbridge Solar are minor adverse.. 5. With regard to cumulative effects during the operation stage with Gate Burton Energy Park, Tillbridge Solar and West Burton Solar Project there are potential moderate adverse landscape effects for the Generating Substations. The Applicant has also worked in partnership to identify areas where projects can collaborate to manage environmental effects.

LIR Ref.	Summary	Applicant's Response
WLDC 23.9 WLDC 23.10 WLDC 23.11	<p>WLDC summarises on Landscape and Visual Impact Assessment:</p> <p><i>"The Applicant has assessed the landscape impact on West Lindsey would be beneficial, including on a cumulative scale; however, within the Cultural Heritage chapter the Applicant recognises that the Scheme will 'have a long-term impact on the landscape character of some tourism and recreation receptors that are reliant on the landscape context for their value, such as viewpoints, landmarks, and cultural heritage assets'. These two assessments appear to be in conflict.</i></p> <p><i>Furthermore, the Gate Burton scheme has assessed a cumulative moderate adverse impact based on the same schemes. The design of the Scheme relies on a 'network of sites' which will blot the landscape for decades and does not follow a contiguous site area. This does not demonstrate the contiguous design which has been implemented on the Gate Burton scheme.</i></p> <p><i>The conclusion provided on the impact of the Scheme being cumulative is therefore in conflict with the assessment undertaken by a similar scheme within West Lindsey."</i></p>	<p>The Applicant acknowledges these comments and responds in turn:</p> <ol style="list-style-type: none"> 1. The conclusions reached in C6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-053] are based on the overall impact on desirability to landscape and heritage tourism receptors in the Local Impact Area during the construction, operational, and decommissioning stages of the development. The assessment of tourism and recreation receptors relies on identifying targeted peak worst-case impacts, but the overall conclusion is formed by professional judgement based on the overall outcomes of C6.2.8_A ES Chapter 8 Landscape and Visual Impact Assessment Revision A [EN010133/EX2/C6.2.8_A] (the 'LVIA'), and C6.2.13 ES Chapter 13: Cultural Heritage [APP-048]. The LVIA takes account of interrelationships with Ecology and Biodiversity, Cultural Heritage and Glint and Glare at paragraphs 8.2.10, 8.4.42 to 8.4.44, 8.6.21 to 8.6.22, 8.6.33, 8.9.1 and 8.9.18 to 8.19.22, including viewpoints VP06, VP17, VP18 and VP47 and concludes significant effects. 2. Each impact assessment approached independently, and different impact assessments can reach different conclusions. This difference can be due to the specific characteristics of the Site for example the topography and vegetation cover. The difference in footprint and showing less significant or beneficial impact could be attributed to the differences in mitigation measures, construction methods, the design and layout of the project or the materials used. 3. Please refer to C8.1.8_A Joint Report on Interrelationships between Nationally Significant Infrastructure Projects Revision A [EN010133/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.
<p>Major Accidents and Disasters (including Fire Safety)</p>		
LCC 14.9 LCC 14.10	<p><i>"The risk of a battery fire in the BESS/substation is rated as 'low' and where the battery storage is itself containerised, thus reducing the risk of damage to the energy storage which may cause fires. An Outline Energy Storage Safety Management Plan has been submitted.</i></p> <p><i>Having reviewed the Outline Battery Storage Safety Management Plan the Council is satisfied that the details meet the requirements the Council set out in Fire Safety Position statement issued at the pre-application stage of the process."</i></p>	<p>The Applicant acknowledges these comments.</p>
LCC 14.11 LCC 14.12 LCC 14.13	<p>LCC concludes:</p> <ol style="list-style-type: none"> 1. <i>"However, without further specific details, e.g. detailed plans etc., the response is based very much on the details within the application documents and note that a requirement is proposed for details of a fire safety plan to be submitted and approved by the Relevant Planning Authority. The Fire Brigade wish to continue to be engaged and views sought during the examination and reserve the right to comment on specific details of the fire strategy including drafting of suitably worded requirements to ensure the correct level of information is available and assessed before any development commences.</i> 2. <i>This also includes any requirement for Hazardous Substance Consent for the battery storage facility if this is considered necessary to be included in the Development Consent Order.</i> 	<p>The Applicant acknowledges these comments and responds:</p> <ol style="list-style-type: none"> 1. The Applicant will continue engaging with the Lincolnshire Fire and Rescue Service throughout the DCO hearing process and will fully consult at the detailed design stage if planning permission is granted. 2. If required at the detailed design stage where a specific BESS design is selected, the Applicant will apply for Hazardous Substance Consent.

LIR Ref.	Summary	Applicant's Response
	<p>3. <i>Therefore on balance the Council considers the impacts associated with matters relating to accidents and disasters, and health to be neutral. This position will be reviewed as further information for fire safety measures and arrangements for subsequent monitoring of the BESS is negotiated.</i></p>	
WLDC 21.14	<p>WLDC identify the following neutral cumulative impact: <i>"The risk of fire from the BESS during construction and decommissioning is negligible due to the containerised construction of the storage units, thus reducing the risk of damage to battery cells which may cause fires. Furthermore, risks associated with damage to battery cells is likely to be isolated and so risk of larger fires is reduced."</i></p>	The Applicant acknowledges these comments.
Minerals		
LCC 11.2 LCC 11.3 LCC 11.4	<p>LCC concludes the following:</p> <ol style="list-style-type: none"> <i>"The Council has considered Chapter 12 (Minerals) of the submitted ES and other relevant documents related to mineral safeguarding. The sites, are only a very small part of the safeguarded mineral resources, and these are predominantly isolated and constrained deposits. When considering the nature and characteristics of the project the Council is satisfied that there would be negligible impact in terms of any sterilisation of mineral resources. In respect of energy minerals, whilst there are some existing oil sites in proximity to the proposals, all elements of the scheme are outside of their associated safeguarding areas and so again, no safeguarding implications arise.</i> <i>Regarding the cable route corridors, these have been refined since the PEIR has been produced, and it is noted that, as set out in the ES, "the Cable Route Corridor has been designed so that wherever possible cable routes follow existing infrastructure corridors or alternatively follow the edge of significant landscape features rather than directly crossing open fields. Such an approach avoids creating a further obstruction to the future exploitation of the mineral resource." This approach aligns with the Councils previous discussions with the applicant. It is also noted that the proposed cable route in the vicinity of the River Trent overlaps with those of other proposed solar projects in the area, therefore minimising cumulative impact on the safeguarded mineral resources in this area.</i> <i>The Council therefore have no mineral safeguarding objections to the proposals and therefore the impacts on the minerals resource is assessed as neutral."</i> 	The Applicant acknowledges these comments.
NCC 2.81 NCC 2.82 NCC 2.83	<p>As the Mineral Planning Authority, NCC is responsible for policies and determining applications relating to mineral development. This includes safeguarding mineral resource (PPG, Paragraph 005, 2014). The emerging Minerals Local Plan contains Policy, SP7, Adopted Minerals Local Plan which seeks to safeguard mineral resource from unnecessary sterilisation from non-mineral development and so establishes Mineral Safeguarding and Consultation Areas (MSA/MCA).</p> <p>The entire western side of the River Trent lies within a Sand and Gravel Mineral Safeguarding Area, but that given relatively small land take we do not foresee any problems. There is an area of concern however. The northern cabling route option, the buffer zone for which, runs through or at least very close to the permit WLDC 20.1 sand and gravel site at Sturton Le Steeple quarry (1/46/06/00014/).</p>	<p>The Applicant acknowledges these comments.</p> <p>Sturton le Steeple Quarry is approximately 3 km north of the cable route to Cottam Power Station. The relative location of the permitted area of Sturton le Street Quarry to the cable route is shown on C6.4.12.1 Figure 12.1 Minerals Resource Assessment Sheet 1. Sturton le Steeple Quarry is identified on that figure as Sand and Gravel Permitted Sites.</p> <p>C6.2.12 ES Chapter 12_Minerals identified a study area for Surface mineral resources. Owing to the distance from the boundary of the Scheme, Sturton le Steeple Quarry falls outside the study area and is thus considered to be unaffected by the Scheme.</p>

LIR Ref.	Summary	Applicant's Response
	Sturton le Steeple Quarry is an important sand and gravel resource landbank, as identified within the Adopted Nottinghamshire Minerals Local Plan.	
WLDC 20.1	WLDC raise the following points arising from the review of the Minerals chapter of the ES: <i>"The proposed Cable Route Corridor has the potential to result in operational issues for future mineral operations and might restrict the efficient exploitation of the resource."</i>	The Applicant acknowledges this comment.
WLDC 20.6	WLDC has identified no positive impacts during construction, operation and decommissioning.	The Applicant acknowledges this comment.
WLDC 20.7 WLDC 20.8 WLDC 20.1 WLDC 20.2 WLDC 20.3 [sic]	WLDC identify the following neutral impacts during construction, operation and decommissioning: <ol style="list-style-type: none"> 1. <i>"In terms of potentially disturbing a mineral deposit to the extent it becomes unviable to exploit, in this case the only identified surface mineral the Scheme affects are sand and gravel deposits. On the basis that the Scheme does not require deep excavations and foundations are limited to galvanised steel poles driven into the ground, disturbance is limited to the surface layers rather than underlying deposits and the Scheme would not affect the long-term viability of working the identified sand and gravel resource."</i> 2. <i>There are no permitted or proposed mineral extraction sites within close proximity that might be affected by the Scheme. Current assessments report that there is no need for new sites to come forward during the plan period up to 2031. Furthermore, on the basis that the Scheme will be decommissioned at the end of its operational life, any minerals would not be permanently sterilised and would be available to exploit if required at a future date. Thus, there is not considered to be any conflict with the relevant mineral safeguarding policies and the Scheme would not constrain mineral extraction in the local vicinity.</i> 3. <i>The Scheme will be decommissioned at the end of its (approximately 40 year) operational life and all above ground structures will be removed and the land restored. Such measures will essentially restore the baseline condition for the identified mineral resources. Any minerals would not be permanently sterilised and would be available to exploit if required at a future date. Where infrastructure is left in the ground (such as cable ducts after decommissioning) these are not anticipated to present any significant constraint to future mineral extraction and would be removed as part of the removal of overburden or extraction of mineral with the same excavation equipment.</i> 4. <i>In view of the current policies of the Mineral Planning Authority, the current sand and gravel landbank and the extensive areas covered by the Area of Search, it seems highly unlikely that the sand and gravel reserve partially underlying the Scheme will need to be worked within the lifetime of the Scheme. Therefore the Scheme is not considered to have a significant impact on the potential sand and gravel supply in the County during the life of the Scheme.</i> 5. <i>In terms of petroleum exploration and development, it is not considered that the proposed Scheme would have any implications for existing or proposed exploration and eventual exploitation of oil and gas resources. Solar arrays and associated development are not considered to be sensitive adjoining land uses to an oil well. Whilst together the solar array Sites occupy a large area, they are not a single block of</i> 	The Applicant acknowledges these comments.

LIR Ref.	Summary	Applicant's Response
	<i>land and are dispersed across a large area thus there is still scope for exploratory drilling across the Petroleum Exploration and Development License area. The method of petrochemical extraction involves limited surface development that could be located outside the solar array Sites and still allow extraction of the mineral beneath those Sites."</i>	
WLDC 20.4 [sic]	<p>WLDC identify the following negative impacts during construction, operation and decommissioning:</p> <p><i>"The proposed Cable Route Corridor, particularly in the Trent Valley, however, does have the potential to result in operational issues for future mineral operations and might restrict the efficient exploitation of the resource. This impact has been mitigated wherever possible by cable routes following existing infrastructure corridors or edges of significant landscape features rather than directly crossing open fields. Such an approach avoids creating a further obstruction to the future exploitation of the mineral resource."</i></p>	The Applicant acknowledges this comment.
WLDC 20.6 [sic]	WLDC has identified no positive cumulative impacts.	The Applicant acknowledges this comment.
WLDC 20.7 WLDC 20.8 WLDC 20.9 WLDC 20.10 [sic]	<p>WLDC identify the following neutral cumulative impacts:</p> <ol style="list-style-type: none"> <i>"In terms of the direct impact on the mineral reserves affected by the Scheme, there are no other plans or proposals for other developments that directly affect these deposits.</i> <i>The Applicant has worked with West Burton Solar Project and with Gate Burton Energy Park to establish a Shared Cable Route Corridor to minimise the overall impact. Without this mitigation multiple cable routes across this safeguarded reserve would further bisect it adding further constraints to any future mineral working and whilst not actually physically sterilising any mineral deposit might make areas uneconomic to work.</i> <i>The potential cumulative impact is considered small as these proposals only affect a relatively small area of an extensive area of search for the lifetime of each of these proposals. The cumulative impact of this Scheme, in combination with the West Burton Solar Project and Gate Burton Energy Park is not considered to have a significant adverse impact on the supply of sand and gravel within Lincolnshire.</i> <i>The Tillbridge Solar scheme does not appear to affect any safeguarded mineral deposits. The site does appear to fall within the mineral consultation zone for 2 oil wells near Glentworth; these are site specific considerations and there are no cumulative impacts arising from this development. "</i> 	The Applicant acknowledges these comments.
WLDC 19.18	<p>WLDC identify the following negative cumulative impacts:</p> <ol style="list-style-type: none"> <i>"The Cable Route Corridors linking the solar array Sites to the former Cottam Power Station site overlap with proposed cable corridors for Gate Burton Energy Park, and for a short distance, also with the cable corridor for the proposed West Burton Solar Project. Much of the overlap is within an area of safeguarded sand and gravel reserves associated within the Trent Valley.</i> <i>Any other proposals for development that sterilise safeguarded mineral resources, particularly those also identified as Area of Search for sand and gravel in the</i> 	The Applicant acknowledges these comments.

LIR Ref.	Summary	Applicant's Response
	<p><i>Lincolnshire Minerals and Waste Local Plan, could have an impact on the supply of sand and gravel within Lincolnshire.</i></p> <p>3. <i>The West Burton Solar Project consists of a number of parcels of land, one of which lies to the west of the Sheffield to Lincoln Railway Line, south east of Marton and east of Brampton. This part of the West Burton Scheme does lie within the Area of Search for sand and gravel.</i></p> <p>4. <i>The Gate Burton Energy Park scheme extends west from Willingham by Stow to Gate Burton and Knaith in the west. The proposed extent of this development does mean that it also covers the same Area of Search for sand and gravel."</i></p>	
Noise and Vibration		
WLDC 14.1	<p>WLDC raise the following points arising from the review of the Noise and Vibration chapter of the Environmental Statement:</p> <ol style="list-style-type: none"> 1. Information has been taken from technical guidance documents to identify thresholds levels at which negligible, minor, moderate and major impacts occur. However, the mapping of these impact threshold levels for construction noise underestimates significance. 2. No information has been provided as to how the noise level was selected as no baseline noise surveys were undertaken along the cabling route. 3. Detailed information on the noise survey methodology and contextual information about the survey locations is not reported. 4. It is noted that maps of the short-term and long-term monitoring locations are provided, however, it is unclear how the measured noise levels have been mapped to receptor locations for the impact assessment. 5. No information on operation phase vibration is reported despite being scoped in. 6. The Noise and Vibration assessments present the calculation results and impact magnitudes but omit key information about how these outcomes were derived, which prevents the stated outcomes from being verified. 7. The assessment reports daytime noise impacts only, which is consistent with the stated construction working hours in Chapter 4. However, it is possible that some night-time working may be required as the cabling route intersects a railway line (adjacent to Cottam 3b) and several roads, meaning that a railway possession or night-time road closure may be required to complete the works. Night-time working would lower the assessment threshold level to 45 dB L_{Aeq} (as a worst-case) and may result in greater impact magnitudes than reported for this activity. 8. The noise prediction methodology and outcomes reported in the ES Chapter and Appendix 15.3 omit the following pertinent information which is required to verify the overall impact to receptors. 9. As no assumptions are declared for the vibration calculations, it is unclear whether the predictions are based on a percussive piling method and whether the values are during steady-state or start-up/run down conditions. 	<p>The Applicant acknowledges these comments and responses in turn:</p> <ol style="list-style-type: none"> 1. The magnitude of effect criteria for construction noise has been mapped incorrectly (Table 15.4), however, the construction noise assessment has utilised the correct threshold value for significance of 65 dB and therefore the results of the assessment remain valid. Noise levels from potential construction activity associated with the Scheme were assessed in accordance with BS 5228-1:2009 + A1 2014 criteria which indicate if a significant effect is likely to occur at noise sensitive properties. Category A threshold value of 65dB is the lowest daytime L_{Aeq,T} threshold value. In addition, construction phase noise is temporary and transient and will only occur during the daytime. Furthermore, Best Practicable Means (BPM) will be implemented to reduce construction noise levels from the site, refer to Appendix 15.3 [APP-139].. 2. As stated in paragraph 15.4.21 of the ES Chapter 15, the cable route corridor assessment has been based on fixed limits noise criteria, due to the impracticality of surveying the large area. Therefore, the threshold limit should be 70 dB for rural areas and not 65 dB as stated. The conclusion of the construction noise assessment remain valid as all receptors are below the 70 dB threshold except for the three receptors highlighted in the ES chapter. 3. Chapter 15: Noise and Vibration states '<i>Full details of the noise monitoring surveys are presented within Appendix 15.1 [APP-137]</i>A summary of the noise monitoring is provided in Paragraph 15.5.5 and 15.5.6 within Chapter 15: Noise and Vibration. Information regarding locations are provided in paragraphs 15.5.7 to 15.5.9, Table 15.13 4. Baseline noise results from the nearest representative noise monitoring locations were assigned to receptors in the vicinity of the noise monitoring locations, figures and results are provided within Appendix 15.1: Noise Survey Information [APP-137].. 5. The Applicant respectfully disagrees, the Scoping Opinion [APP-064] paragraph 15.4.6 states that there will be "<i>no significant sources of vibration during operation. Considering the nature of the Proposed Development during operation, the Inspectorate is content to scope this matter out.</i>" 6. From construction and operational noise, source data for construction activities and operational sources (inverters etc.) Paragraph 15.4.5 of the Chapter 15: Noise and Vibration [APP - 050] states 'The levels of vibration at the specified receptors have been predicted using the formulae provided in Table E.1 of BS 5228-2:2009+A1:2014.' 7. Paragraph 15.6.4 of Chapter 15 states that "<i>Working hours onsite are likely to be carried out Monday to Friday 07:00 – 18:00 and between 08:00 and 13:30 on Saturdays. However, some activities may be required outside of these times (such as the delivery of abnormal loads, night-time working for cable construction works in public highways or horizontal directional drilling activities). No noisy operations will take place during</i>

LIR Ref.	Summary	Applicant's Response
	<p>10. Information about the sound sources considered in the operation phase assessment is required to confirm the scope of the assessment and assumptions made in the noise modelling.</p> <p>11. A requirement of a BS 4142 assessment is to include information about uncertainty within the assessment. No information on this is provided.</p> <p>12. Appropriate types of noise mitigation measures are proposed to control noise emissions from the project, however, the stated performance requirement for the acoustic louvres is ambiguous.</p>	<p><i>mobilisation/shut down, 1 hour before and after working hours."</i> If night-time working does occur, the number of operational plant and its duration of use will be reduced to minimise any potential impacts. Best Practicable Means (BPM) will be implemented to reduce construction noise levels. This is secured in table 3.6 of the C7.1 Outline Construction Environmental Management Plan.</p> <p>8. The Applicant respectfully disagrees, Chapter 15: Noise and Vibration, Appendices 15.1 and 15.3 [APP-137] and 15.3 [APP-139] provide the methodologies, input data and assumptions and detail the overall impacts at receptors.</p> <p>9. The ES Chapter states that vibratory piling methods have been assumed and how the impact has been calculated. See paragraph 15.7.26, 15.7.29, 15.7.32, 15.7.35 & 15.7.38 of Chapter 15: Noise and Vibration, for example.</p> <p>10. Noise source data is included in paragraphs 15.7.63 – 15.7.70 of ES Chapter 15: Noise and Vibration [APP-050].</p> <p>11. It is correct that no uncertainty has been included in the assessment due to the robust baseline noise data, octave band frequency data utilised in the noise model. However, a +2 dB correction for tonal characteristics was applied to the calculations although no tones are predicted to be objectively present. However, the measured existing background noise level at the monitoring locations in the assessment were below 30dB and rating levels were predicted to be less than 35dB. Therefore, the BS4142 assessment was discounted due to low noise levels and a more suitable assessment undertaken refer to paragraphs 15.7.27 to 15.7.38 of ES Chapter 15: Noise and Vibration [APP-050].</p> <p>12. Acoustic louvres were modelled to provide broadband attenuation of at least 10 dB. The performance of acoustic louvres will vary between models and manufacturers. However, a generic acoustic louvre was utilised in the noise model and a reduction of 10dB was achieved. It is considered that a 10dB reduction is readily achievable and is not considered to be a constraint regarding embedded mitigation.</p>
<p>WLDC 14.7 WLDC 14.8</p>	<p>WLDC has identified no positive and no neutral impacts during construction and decommissioning.</p>	<p>The Applicant acknowledges these comments and refers to the responses above in WLDC.14.6 regarding construction noise which is not deemed significant in terms of EIA.</p>
<p>WLDC 14.9 WLDC 14.10 WLDC 14.11</p>	<p>WLDC identify the following negative impact during construction and decommissioning :</p> <ol style="list-style-type: none"> 1. <i>"Construction noise levels at all receptors throughout the Scheme are predicted to be within the daytime construction noise criteria of 65 dB(A). Construction noise is temporary and it is assumed that all construction activities will be happening simultaneously across the Scheme (worst-case scenario). Construction activity on the Sites and cable corridor would likely be experienced by limited receptors at any given time as work progresses across the Scheme. Therefore, for construction noise, the magnitude of change is negligible which results in a moderate/minor residual effect which is not significant for the purposes of EIA regulations.</i> 2. <i>Construction activities are temporary and it is considered that any periods of construction vibration experienced at each separate receptor would unlikely exceed one month. Construction activity on the Sites would likely be experienced by limited receptors at any given time as work progresses across the Scheme. Therefore, for construction vibration, the magnitude of change is negligible which results in a moderate/minor residual effect which is not significant for the purposes of the EIA regulations.</i> 	<p>The Applicant acknowledges these comments and refers to the responses above in WLDC.14.6 regarding construction noise which is not deemed significant in terms of EIA.</p>

LIR Ref.	Summary	Applicant's Response
	3. <i>Noise and vibration effects during the decommissioning phase will be similar or less than the noise effects during the construction phase and therefore not deemed significant in terms of EIA.</i>	
WLDC 14.12 WLDC 14.13	WLDC has identified no positive and no neutral impacts during operation.	The Applicant acknowledges these comments.
WLDC 14.14	WLDC identify the following negative impact during operation: <i>"The primary sources of noise from the operational development are the inverters and transformers serving the solar panels. Overall, operational noise levels at the nearest receptors to the Scheme would exceed the existing background noise levels in many cases. Mitigation has been used to ensure noise levels do not result in significant impacts throughout the Scheme during the operational phase and consequently the magnitude of change is considered negligible, which results in a moderate/minor residual effect and therefore not considered significant for the purposes of the EIA Regulations."</i>	The Applicant acknowledges these comments. Operational noise associated with the Scheme results in a moderate/minor residual adverse effect and is therefore not considered significant for the purposes of the EIA Regulations. Section 15.7 Chapter 15; Noise and Vibration [APP-050]
WLDC 23.24	WLDC summarises on Hydrology, Flood Risk and Drainage: <i>"The Scheme will result in noise and vibration impacts which would be result of from construction activities and construction traffic. The cumulative impacts from construction could be compounded if the other solar schemes of Gate Burton, Tillbridge and West Burton were being constructed at the same time as the [sentence incomplete]"</i>	The Applicant acknowledges these comments. Cumulative effects are presented in Section 15.9 of Chapter 15: Noise and Vibration [APP-050].
Public Rights of Way (PRoWs)		
LCC 9.3 LCC 9.4	<ol style="list-style-type: none"> <i>"As a general observation on the wording of the draft DCO there needs to be greater clarity regarding the necessary temporary stopping up of paths and advance notice procedures. There needs to be a clear procedure for temporary closing or diverting rights of way with clear details about reinstatements of any paths and surface of any diverted routes."</i> <i>"Records shows that there are a number of routes within or close to the Order limits which are claimed paths and if these claims are successful this will have the potential to impact on the development if not addressed in the DCO."</i> 	C3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C] sets out the extent to which powers to temporarily stop up PRoWs are sought, both with regard to geographical extent (i.e. the length and location of the PRoWs affected) and full extent of the powers sought. Details of the need to close or divert each affected PRoW, and the procedure for doing so are set out in the outline C6.3.14.3_B ES Appendix 14.3 Public Rights of Way Management Plan Revision B [EN010133/EX2/C6.3.14.3_B]. A full detailed plan that is substantially in accordance with the outline Public Rights of Way Management Plan is secured by Requirement 18 in Schedule 2 of the Draft DCO.
LCC 9.5	<i>"In respect of PROW Fillingham 86 which is proposed to be temporarily stopped up but more details in respect of this stopping up are required. There are a number of other footpaths that are also affected where either more details are required or opportunities exist for enhancement which should be given appropriate consideration to determine what is possible through agreements or other appropriate mechanisms."</i>	<p>Details of the need to close or divert each affected PRoW, and the procedure for doing so are set out in the outline C6.3.14.3_B ES Appendix 14.3 Public Rights of Way Management Plan Revision B [EN010133/EX2/C6.3.14.3_B]. A full detailed plan that is substantially in accordance with the outline Public Rights of Way Management Plan is secured by Requirement 18 in Schedule 2 of C3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C].</p> <p>With specific regard to PRoW Fillingham 86, this falls along the edge of the Order Limits of the Cottam 1 Site. Any need or scope for temporary diversions here would be to facilitate works such as landscaping work to boundary planting, groundcover planting, and the installation of security fencing and screening planting alongside the solar array, as indicatively set out in C6.4.8.16.3_A Figure 8.16.3 Landscape and Ecology Mitigation and Enhancement Plan - Cottam 1 North Sheet 3 Revision A [REP-027]. The measures in these plans are secured by Requirement 7 of Schedule 2 to C3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C].</p>
LCC 9.6	<i>"Whilst there are opportunities for positive impacts associated with the enhancement to existing footpath network there are currently some unresolved issues regarding the necessary</i>	The Applicant is committed to ensuring the existing PRoW network is enhanced where possible through safeguarding of routes within the Order Limits, supplemented by additional planting. The provision of an

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	<p><i>works and reinstatement to the existing public footpath network and until these matters are resolved it is considered that the impact on Public Rights of Way is currently negative."</i></p>	<p>additional permissive path is secured through Work No. 11 in Schedule 1 of C3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C].</p> <p>Public Rights of Way may be subject to short-term temporary diversions or closures to facilitate cable laying as set out in para 3.13 of C6.3.14.3_B ES Appendix 14.3 Public Rights of Way Management Plan Revision B [EN010133/EX2/C6.3.14.3_B]. Sections 2, 3, and 4 of the PRowMWP set out the suite of measures to be applied to mitigate construction and operational impacts on the network. All Public Rights of Way are to remain open during construction where feasible, and all existing Public Rights of Way are to be retained during the Scheme's operational lifetime. These commitments will be secured through Requirement 18 in Schedule 2 of C3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C].</p>
<p>Socio-economics, Tourism and Recreation</p>		
<p>LCC 14.7</p>	<p><i>"The Council's Director of Public Health is undertaking research into the potential health impacts of large scale solar farms and to identify possible links to the sites of these projects and areas of deprivation. However, this will not be available in time for the submission of the LIR but will be brought to the attention of the Examining Authority if concluded during the examination."</i></p>	<p>The Applicant notes this comment and awaits the outcome of the Director of Public Health's report.</p>
<p>NCC 2.79 NCC 2.80</p>	<p>Public rights of way are an important consideration for the County Council. It is anticipated that the main disruption to public rights of way would be during the construction phase.</p> <p>It would be difficult to comment until the specific route has been identified. Trenching underground cabling, requiring a 25m working corridor, would invariably affect PROW in the short term during the construction phase and it is requested that these closures, wherever practicable, are employed sensitively to optimise the connectivity of the wider PROW network and any works that affect the safe use of the PROW should be closed temporarily under a formal Traffic Regulation Orders (TRO), which is managed by Nottinghamshire County Council as Highway Authority.</p>	<p>The Applicant agrees that Public Rights of Way are an important consideration for the Scheme, and with regard to the use of PRowMs for tourism and recreational access to the countryside it has been assessed that the greatest level of impact is up to a moderate-minor adverse effect as a result of construction impacts, as set out at paragraph 18.7.62 of C6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-053].</p> <p>Public Rights of Way may be subject to short-term temporary diversions or closures to facilitate cable laying as set out in para 3.13 of C6.3.14.3_B ES Appendix 14.3 Public Rights of Way Management Plan Revision B [EN010133/EX2/C6.3.14.3_B]. All Public Rights of Way are to remain open during construction where feasible, and all existing Public Rights of Way are to be retained during the Scheme's operational lifetime. These commitments are secured through Requirement 18 in Schedule 2 of C3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C].</p> <p>Table 3.8 of C7.1_B Outline Construction Environmental Management Plan Revision B [EN010133/EX2/C7.1_B] notes that closures to PRowMs will be kept to a minimum, will be temporary in nature and will be supported by appropriate amounts of notice and accompanied by suitable diversions.</p>
<p>WLDC 9.1</p>	<p>WLDC identify the following socio-economic, tourism and recreation impacts:</p> <ol style="list-style-type: none"> 1. It is questioned how the Scheme will identify the required workforce to deliver all the Schemes at the same time. 2. There will be an oversubscription of rooms for approx. 4 months for temporary employees which shows that there is insufficient accommodation space. In addition, on a cumulative level, there would be a further oversubscription of rooms if the Schemes were to be constructed at the same time. 3. <i>"The Applicant recognises that during the operational the Scheme will have a long term impact on the landscape character of some tourism and recreation receptors that are reliant on the landscape context for their value, such as viewpoints, landmarks, and cultural heritage assets. Thus, the maximum long-term moderate-minor adverse effect on the desirability of local tourist attractions and recreation centres in the Local Impact</i> 	<ol style="list-style-type: none"> 1. The Applicant has assessed the quantum of construction workers required for the Scheme individually and cumulatively in Sections 18.7 and 18.10 of C6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-053] respectively, and has considered the likely proportion of those to be found from within the Local Impact Area, and wider Regional Impact Area. Cumulatively, the Schemes are likely to have a significant beneficial effect on construction employment, as the construction employment is estimated to be 17.7% of the construction employment workforce in the Local Impact Area (see para. 18.10.9). To support this, Sections 5.3 and 5.4 of C7.10 Skills Supply Chain and Employment Plan [APP-349] outlines the measures the Scheme is taking with regard to maximising opportunities for sourcing local employment, recruitment and supply chains. These measures are secured by Requirement 20 of Schedule 2 to C3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C]. 2. The Applicant has included an assessment of the cumulative impact on accommodation need for construction employees at para. 18.10.11-12 of C6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-053]. The assessment identifies a peak cumulative medium-term temporary minor

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	<p><i>Area could lead to a proportional maximum long-term moderate-minor adverse effect on the local tourism industry and economy. Should the other solar schemes in the area be consented, it is considered that this impact will be amplified as large areas of West Lindsey will be characterised by solar farms."</i></p> <p>4. <i>"The Applicant recognises that there will be a long-term impact on tourism as a result of the Scheme during the construction phase. There is a potential for the Scheme to reduce the desirability of the Local Impact Area for tourism, and as such, an estimated worst-case scenario of a 1% drop in visitor spending per annum is assessed herein. It is therefore questioned that once the operation period has started and noting the applicants recognition that there will be a that the impact on a long-term impact on the landscape character whether it has been assessed about the loss in long-term loss for the tourism economy [sic]."</i></p> <p>5. The Scheme will result in the loss of approx. 17 agricultural sector jobs. It is difficult to determine whether these jobs will realistically return following a 40-year gap in employment.</p> <p>6. The estimated agricultural jobs losses do not take into account the wider supply chain and contractor services attributed to the affected farm businesses.</p> <p>7. In considering the above, it is questioned whether the impacts on long-term indirect agricultural job losses have been considered accurately. With 40 years, 60 for Gate Burton, of diminished agricultural activity in West Lindsey it is likely that these skills could be lost from the local area which is rural in nature at present.</p> <p>8. There is a concern that the BESS within Cottam 1 could cause fire hazards to the local populace both directly from fires and also the impact on air quality for the local populace.</p>	<p>adverse effect to the accommodation sector in the Local Impact Area. This is therefore not a significant effect.</p> <p>3. The Applicant has included an assessment of the cumulative impact on tourism and recreation receptors at para. 18.10.51-52 of C6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-053]. This demonstrates that while there is anticipated to be a greater level of adverse impact cumulatively than when considering the Scheme in isolation, the cumulative impact on the landscape context for tourism and recreation receptors is not significant.</p> <p>4. The Applicant has estimated a worst-case 1% loss in visitor spending during the operational life of the Scheme. The resultant impact on the tourism and recreation employment and economy has been assessed at paragraph 18.7.78 of C6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-053] as inducing a loss of approximately 5 FTE jobs, and a loss of £240,000 GVA per annum to the tourism and recreation economy. This is assessed to be a long-term minor adverse effect (para 18.7.78 and 18.7.95), and is therefore not a significant effect.</p> <p>5. The Applicant has assessed a worst-case loss of 17 FTE agricultural jobs as a result of the Scheme, 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.</p> <p>6. 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 Sites, 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 effects have not been assessed.</p> <p>7. The Land Use in England 2022² statistics show that 97,815 hectares in West Lindsey are agricultural land. The Scheme Sites cover an area of 1,267ha (excluding the cable route corridor). Cumulatively, Cottam Solar Project, West Burton Solar Project, Gate Burton Energy Park, and Tillbridge Solar cover approximately 3,900ha of agricultural land. This is equivalent to 1.3% (Cottam) and 4.0% (cumulatively) of the agricultural land in West Lindsey. Agricultural use is proposed to continue on the majority of the remaining 96.0%, and as such, there is not likely to be a significant skills deficit in agriculture as a result of the Scheme or cumulative NSIPs in West Lindsey.</p> <p>8. The direct impact of fire hazards has been covered in para. 21.6.40-46 of C6.2.21 ES Chapter 21 Other Environmental Matters [APP-056]. The assessment determines there is no significant effects to human safety directly from fire or uncontained explosions due to the separation of the BESS from properties or publicly accessible areas. Impacts on human health from reduced air quality as a result of fires and emissions have been assessed in C6.2.17 ES Chapter 17_Air Quality [APP-052], which finds no significant effects to human health. Mitigation and safety measures to ensure human health is not harmed is set out in C8.4.17.2 Air Quality Impact Assessment of Battery Energy Storage Systems (BESS) Fire [REP-079] and C7.9 Outline Battery Storage Safety Management Plan [submitted at Deadline 2], the latter of</p>

² Department for Levelling Up, Housing and Communities (2022). Official Statistics: Land use in England, 2022. Available at <https://www.gov.uk/government/statistics/land-use-in-england-2022>

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		<p>which is secured by Requirement 6 of Schedule 2 to C3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C]. Matters relating to air quality, socio-economics, tourism and recreation, and major accidents and disasters have been agreed, or are still under discussion with the UK Health Security Agency, as set out in C8.3.6 Statement of Common Ground with the UK Health Security Agency [REP-067].</p>
<p>WLDC 9.12 WLDC 9.13 WLDC 9.14 WLDC 9.15</p>	<p>WLDC identify the following positive impacts during construction:</p> <ol style="list-style-type: none"> 1. Increase in accommodation employment to meet increased demand for accommodation from inbound construction workers. 2. Construction would bring a £12.2 million GVA uplift to the local construction economy. 3. The use of temporary accommodation for inbound temporary construction workers from outside the Local Impact Area is likely to induce a GVA uplift to the accommodation sector economy of £1.7 million. 	<p>The Applicant agrees that the Scheme will bring about these beneficial impacts during construction. These have been assessed in C6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-053] at the following paragraphs:</p> <ol style="list-style-type: none"> 1. Paragraph 18.7.17; 2. Paragraph 18.7.45; and 3. Paragraph 18.7.49.
<p>WLDC 9.16 WLDC 9.17 WLDC 9.18 WLDC 9.19</p>	<p>WLDC identify the following neutral impacts during construction:</p> <ol style="list-style-type: none"> 1. The consequential estimated labour requirement for the Scheme over the projected 24-month construction period is a gross 467 full time equivalent (FTE) employees per annum, with an estimated peak at approximately 788 employees at month 14 of the construction period. 2. The construction workforce is to consist of a mix of employees from within and outside the Local Impact Area. There may be need for specialist employment to be sourced from outside the Local Impact Area where particular skillsets cannot be sourced locally. 3. The level of accommodation needed for temporary construction workers is likely to exceed accommodation stock in the peak construction months, thus displacing a proportion of the usual number of visitors using accommodation in the Local impact Area. As the visitor population is being displaced by construction workers also seeking temporary accommodation, the effect is neutral. 4. The anticipated uplift in population is anticipated to be negligible in magnitude, at both level of the Local and Regional Impact Areas. Any changes to the demographic profile of either the Local or Regional Impact Area are expected to be extremely low and unlikely to have either a predominantly positive or negative bias. 	<ol style="list-style-type: none"> 1. The Applicant considers the uplift in labour as a result of the construction of the Scheme, and the resultant uplift in construction industry employment is a beneficial effect to the Local Impact Area, as assessed at paragraph 18.7.12 of C6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-053]. <p>The Applicant agrees that the Scheme will bring about these neutral impacts during construction. These have been assessed in C6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-053] at the following paragraphs:</p> <ol style="list-style-type: none"> 2. Paragraph 18.7.6; 3. Paragraph 18.7.18; and 4. Paragraph 18.7.29.
<p>WLDC 9.20</p>	<p>WLDC identify the following negative impacts during construction:</p> <p><i>"It is projected to impact on up to 1,451 hectares of agricultural land for the operational lifetime of the Scheme, this will therefore cause approximately 17 FTE agricultural sector jobs to be lost. This impacts approximately 0.4% of the agricultural sector employment, and as such is a low magnitude impact. Due to its medium sensitivity this results in a long-term moderate-minor adverse effect to the Local Impact Area. In the Regional Impact Area, this is a 0.04% reduction in agricultural employment, representing a negligible change to a receptor of low sensitivity. Therefore, the effect is long-term negligible adverse."</i></p>	<p>The Applicant agrees that the Scheme will bring about an adverse impact to agricultural employment during construction. This has been assessed as a long-term moderate-minor adverse effect to the Local Impact Area and a long-term negligible adverse effect in the Regional Impact Area in C6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-053] at para. 18.7.15.</p> <p>The Applicant seeks to reiterate that this impact is not significant, and furthermore is based on the assessment of a worst-case loss of 17 FTE agricultural jobs as a result of the Scheme, derived from 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].</p>

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WLDC 9.21	<p><i>"The 17 agricultural sector jobs that have been identified by the Applicant are linked to the 4 farm businesses within the Order Limits. Farm A is considered to have no FTE, Farm B is considered to have 7 FTE, Farm C is considered to have 4 FTE and Farm D is considered to have 5 FTE and 2 part-time jobs. These estimates do not take into account the contractor services attributed to these farm businesses. As such, the actual impact upon jobs in the agricultural sector (including the supply chain) will be higher than the figures reported in the ES. Furthermore, the applicant has not provided a cumulative assessment to demonstrate the actual likely impact upon the agricultural sector should the Cottam Solar Project be implemented alongside other solar projects."</i></p>	<p>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 Sites, 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, even when considered cumulatively with other NSIPs in the Till Valley area of West Lindsey. As a result, these effects have not been assessed.</p>
WLDC 9.22	<p><i>"The impacts on the availability of accommodation for tourism and recreation as a result of a loss of available accommodation space has potential to have a short-term peak of medium magnitude. However, this is to be mitigated to reduce the impacts to a medium-term low magnitude over the course of the construction period. Resultantly, the impact on accommodation for visitors is a medium-term temporary moderate-minor adverse effect."</i></p>	<p>The Applicant agrees that the Scheme will bring about an adverse impact to accommodation for tourism and recreational visitors during construction. This has been assessed in C6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-053] at para. 18.7.36 which concludes that the effect to tourism and recreational visitors is a moderate-minor adverse effect. The Applicant seeks to reiterate that this impact is temporary, and is not significant.</p>
WLDC 9.23 WLDC 9.24 WLDC 9.25	<p>WLDC identifies the following impacts relating to serviced accommodation units:</p> <ol style="list-style-type: none"> Oversubscription of rooms for approx. 4 months. The maximum rate of oversubscription during these months is 2.7% if normal occupancy of rooms for business and tourism are retained. As such, there is insufficient accommodation space within the Local Impact Area. Employees would therefore have to be accommodated elsewhere or alternatively would displace up to 2.7% of predicted business and tourism occupants. Furthermore, the construction timescale has an embedded level of flexibility, and thus the peak need could be moved to months of greater usual capacity. <i>"The anticipated increase in construction workers in the Local Impact Area is likely to create increased demand for accommodation, and will therefore have a potential impact on temporary and permanent accommodation stock within the Local Impact Area including hotel rooms, temporary accommodation, and rented and market properties."</i> <i>"Should the temporary employees from outside the Local Impact Area require accommodation in temporary accommodation units, the anticipated peak monthly requirement will be 282 units, in the context of a known temporary accommodation stock of 1,419 units within the Local Impact Area. As identified previously, the accommodation sector in the Local Impact Area is of a medium sensitivity to change due to its small size, particularly in relation to the Regional Impact Area or national trends. The potential for construction employees increasing the occupation rate of accommodation units throughout the construction period would have a high positive impact directly on the accommodation sector, thus having a direct medium-term temporary major-moderate beneficial effect. This therefore would be a significant effect. However, the impacts on the availability of accommodation for tourism and recreation as a result of a loss of available accommodation space has potential to have a short-term peak of medium magnitude. However, this is to be mitigated to reduce the impacts to a medium-term low magnitude over the course of the construction period. Resultantly, the impact on accommodation for visitors is a medium-term temporary moderate-minor adverse effect."</i> 	<p>The Applicant agrees that the Scheme will bring about minor adverse impacts to accommodation for tourism and recreational visitors during construction. This has been assessed in C6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-053]. The Applicant seeks to reiterate that these impacts are temporary, and are not significant. The assessment of these effects is found at the following paragraphs:</p> <ol style="list-style-type: none"> Table 18.12; Paragraph 18.7.33; and Paragraph 18.7.36. <p>The Applicant does however reiterate that the increased demand for temporary accommodation for construction employees will have a medium-term temporary major-moderate beneficial effect on accommodation occupancy rates and thus accommodation sector employment. This therefore would be a significant beneficial effect in the Local Impact Area.</p>

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WLDC 9.26	<i>"The projected of lost spending in the tourism economy would be an equivalent loss of 1 FTE worker in the RSTU grouped sector industry (based on an average £44,841 GVA per worker per annum). This impacts approximately 0.04% of the 3,500-strong RSTU sector employment in the Local Impact Area, and as such is a negligible magnitude impact to a low sensitivity receptor, resulting in a short-term temporary negligible adverse effect. The magnitude of impact is smaller at the regional level (0.002% reduction to 93,000 employees), and therefore results in a short-term temporary negligible adverse effect."</i>	The Applicant notes this comment and seeks to reiterate that this impact is temporary, and is not significant.
WLDC 9.27	<i>"The projected uplift of 0.06% to the residential population in the Local Impact Area represents a medium-term temporary negligible magnitude impact with regard to the number of people requiring access to local services including primary health services. This could therefore have secondary impacts on other types of health and wellbeing receptors in the population of the Local and Regional Impact Areas as a result of reduced accessibility to local healthcare services. As rates of disability and long-term physical health conditions in the Local Impact Area are more in keeping with national trends than for other health indicators, the sensitivity is low, and thus the negligible scale impact would result in a medium-term temporary negligible adverse effect. This would be the same in the Regional Impact Area."</i>	The Applicant notes this comment and seeks to reiterate that this impact is temporary, and is not significant.
WLDC 9.28	<i>"There is an assessed negligible impact on public transport services. Baseline conditions demonstrate that compared to regional and national rates the Local Impact Area has a substantially greater rate of driving to work and lower rate of use of public transport. As a result, working commuting patterns in the Local Impact Area are of a medium sensitivity to change. Resultantly, at worst, the impact on existing commuters is a medium-term minor adverse effect."</i>	The Applicant notes this comment and seeks to reiterate that this impact is temporary, and is not significant.
WLDC 9.29	<i>"The secondary impacts of the Scheme could lead to a loss of £60,000 to the tourism economy as a result of reduced visitor spending. This is equivalent to a loss of 1.4 FTE workers based on a GVA per worker of £44,841 (Ref 18.60). Most of this economic loss will be felt in the local arts, entertainment, and recreation sector, which is of a low sensitivity to change. As such, a £60,000 loss to this economic sector (worth £76 million) represents a loss of 0.08% which therefore constitutes a negligible magnitude impact, resulting in a medium-term temporary negligible adverse effect. This loss to the arts, entertainment, and recreation sector in the Regional Impact Area, worth £2.9 billion, is a loss of 0.002% which is a medium-term temporary negligible adverse effect."</i>	The Applicant notes this comment and seeks to reiterate that this impact is temporary, and is not significant.
WLDC 9.30	<i>"The number of identified landscape and heritage tourism receptors that are likely to be adversely effected by the Scheme's construction are likely to have a low overall impact on the desirability of the Local Impact Area for tourists and visitors. Resultantly, the effect on local tourism attractions in the Local Impact Area is minor adverse."</i>	The Applicant notes this comment and seeks to reiterate that this impact is temporary, and is not significant.
WLDC 9.31	The Scheme's construction is likely to have direct impacts on a number of Public Rights of Way and long-distance recreation routes as a result of temporary use as construction accesses. As a result of the embedded mitigation measures the greatest effects on the use, accessibility, and desirability of either Public Rights of Way or of long distance recreation routes are moderate-minor adverse effects.	<p>The Applicant notes this comment and seeks to reiterate that this impact is temporary, and is not significant.</p> <p>The Applicant agrees that Public Rights of Way are an important consideration for the Scheme, and with regard to the use of PROWs for tourism and recreational access to the countryside it has been assessed that the greatest level of impact is up to a moderate-minor adverse effect as a result of construction impacts, as set out at paragraph 18.7.62 of C6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-053].</p> <p>Public Rights of Way may be subject to short-term temporary diversions or closures to facilitate cable laying as set out in para 3.13 of C6.3.14.3_B ES Appendix 14.3 Public Rights of Way Management Plan Revision B [EN010133/EX2/C6.3.14.3_B]. All Public Rights of Way are to remain open during construction where feasible, and</p>

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		<p>all existing Public Rights of Way are to be retained during the Scheme's operational lifetime. These commitments are secured through Requirement 18 in Schedule 2 of C3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C].</p> <p>Table 3.8 of C7.1_B Outline Construction Environmental Management Plan Revision B [EN010133/EX2/C7.1_B] notes that closures to PRowS will be kept to a minimum, will be temporary in nature and will be supported by appropriate amounts of notice and accompanied by suitable diversions.</p>
WLDC 9.32	<i>"There are up to moderate-minor adverse effects on pedestrian and cycling traffic as a result of fear and intimidation from construction vehicle movements."</i>	The Applicant agrees that the Scheme will bring about an adverse impact to non-vehicular highway users during construction. This has been assessed in C6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-053] at para. 18.7.63. The Applicant seeks to reiterate that this impact is temporary, and is not significant.
WLDC 9.33 WLDC 9.34	<p>WLDC identify the following positive impacts during operation:</p> <ol style="list-style-type: none"> 1. Much of the operation and maintenance employment will sit within the energy sector. As such, the net direct employment uplift of 7 workers in the context of approximately 410 sector workers in the Local Impact Area represents a 1.7% increase from 2020 levels. 2. The resultant net uplift in GVA per annum of £400,000 represents a potential increase of 0.1% in the local agriculture, mining, electricity, gas, water and waste (ABDE) grouped sector economy. 	<p>The Applicant agrees that the Scheme will bring about these beneficial impacts during its operation. These have been assessed in C6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-053] at the following paragraphs:</p> <ol style="list-style-type: none"> 1. Paragraph 18.7.73; and 2. Paragraph 18.7.92.
WLDC 9.35 WLDC 9.36 WLDC 9.37 WLDC 9.38	<p>WLDC identify the following negative impacts during operation:</p> <ol style="list-style-type: none"> 1. As identified in the likely effects from the Scheme's construction, there are approximately 17 agricultural sector jobs that will remain lost during the Scheme's operational lifetime. 2. This is estimated to have an economic impact of £800,000 per annum, reducing the value of the local agricultural economy by approximately 0.3% in the Local Impact Area. This notwithstanding, the Scheme is likely to bring a direct benefit to local landowners through payment of annual ground rent. This is anticipated to be in the region of £2.4 million per annum. 3. Whilst the operation of the Scheme is not anticipated to have a direct impact on the serviced accommodation in contrast to the construction phase, there is a potential for the Scheme to reduce the desirability of the Local Impact Area for tourism, and as such, an estimated worst-case scenario of a 1% drop in visitor spending per annum is assessed herein. 4. The development of the Scheme will have a long-term impact on the landscape character of some tourism and recreation receptors that are reliant on the landscape context for their value, such as viewpoints, landmarks, and cultural heritage assets. This could therefore have a secondary impact on local business that are reliant on tourism. 	<p>The effects identified by WLDC have been assessed in C6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-053]. The Applicant seeks to reiterate that whilst these impacts are long-term during the Scheme's operational phase, these are not significant. The assessment of these effects is found at the following paragraphs:</p> <ol style="list-style-type: none"> 1. Paragraph 18.7.75; 2. Paragraph 18.7.94; 3. Paragraph 18.7.95; and 4. Paragraph 18.7.100-113.
WLDC 9.39	WLDC identify the following positive impact during decommissioning:	The Applicant agrees that the Scheme will bring about a beneficial impact to the construction employment sector during decommissioning. This has been assessed in C6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-053] at para. 18.7.118.

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	<ol style="list-style-type: none"> The net direct employment from the Scheme decommissioning is likely to most benefit the construction employment sector. The net uplift of 180 workers is a 3.8% increase to construction employment in the Local Impact Area. 	
WLDC 9.40	<p>WLDC identify the following neutral impact during decommissioning:</p> <ol style="list-style-type: none"> Following completion of the decommissioning phase, employment will return to near baseline levels. 	The Applicant considers the return of employment levels to near baseline levels at the conclusion of decommissioning to be a minor beneficial effect, as assessed at paragraph 18.7.123 of C6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-053].
WLDC 9.41	<p>WLDC identify the following negative impact during decommissioning :</p> <ol style="list-style-type: none"> The baseline socio-demographic conditions used for assessing the construction phase in 2024-2026 are unlikely to be representative of the population in 2066 at the assessed time of decommissioning. The uplift in population associated with the decommissioning of the Scheme is likely to affect some socio-demographic receptors such as access to local services including primary health services, access to accommodation, access to employment and education, and health and wellbeing. Any effects on the socio-demographic environment of the Local Impact Area are unable to be representatively assessed. 	The Applicant agrees that the Scheme has potential to bring about an adverse impact to socio-demographic receptors during decommissioning. This has been assessed in C6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-053] at para. 18.7.127. The Applicant seeks to reiterate that this impact is temporary, and is not significant.
WLDC 9.44 WLDC 9.45	<p>WLDC identify the following positive cumulative impacts during construction:</p> <ol style="list-style-type: none"> The anticipated uplift in need for temporary accommodation for inbound construction workers is likely to generate a peak of £6.0 million GVA in the year 2026 to the accommodation and services sector economy. This represents a 11.0% increase in the Local Impact Area. Accounting for "leakage" of commuters from outside the Local Impact Area, and existing employment displacement, the peak net uplift in construction employment in the Local Impact Area is 838 FTE employees in 2026. This represents an increase of 17.7% in construction employment. 	<p>The Applicant agrees that there is anticipated to be these beneficial cumulative impacts during construction. These have been assessed in C6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-053] at the following paragraphs:</p> <ol style="list-style-type: none"> Paragraph 18.10.23; and Paragraph 18.10.9. <p>The Applicant seeks to reiterate that the peak uplift in construction employment in the Local Impact Area is a significant beneficial effect.</p>
WLDC 9.46 WLDC 9.47 WLDC 9.48	<p>WLDC identify the following negative cumulative impacts during construction:</p> <ol style="list-style-type: none"> The peak level of accommodation needed for temporary construction workers is likely to exceed accommodation stock, thus displacing a notable proportion of the usual number of visitors using accommodation in the Local impact Area. The greatest level of economic impact to tourism and recreation, most likely to be felt in the arts, entertainment, and recreation grouped sector, is estimated to occur in 2023. The peak economic effect is estimated to be a loss of £110,000. This amounts to a 0.1% reduction in the economic sector. Of the Public Rights of Way and long-distance recreation routes assessed, the Trent Valley Way is likely to see the greatest level of cumulative impact. These cumulative impacts are as a result of direct impacts from cable routes crossing the Trent Valley Way, and visual impacts from the multiple projects nearby or adjacent to the two variant routes of the Trent Valley Way. In a worst-case scenario, construction of the cable routes of the identified projects may run sequentially over a five-year period, requiring the Trent Valley Way to be closed three times during this. Where feasible, the Applicant would look to work with other 	<p>The Applicant agrees that there is anticipated to be adverse cumulative impacts during construction. This has been assessed in C6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-053].</p> <p>The Applicant seeks to reiterate that these impacts to visitor accommodation stock and to tourism and visitor spending are temporary, and are not significant. The assessment of these effects is found at the following paragraphs:</p> <ol style="list-style-type: none"> Paragraph 18.10.12; and Paragraph 18.10.24. <p>The Applicant has assessed cumulative impacts on the impacts to PRoWs and long distance recreational routes at para. 18.10.31. The Applicant seeks to reiterate that the impacts are a peak short-medium term temporary moderate adverse effect to the Trent Valley Way. This is therefore a significant effect.</p>

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	developers to seek to ensure that relevant the impacts to affected Public Rights of Way and long-distance recreation routes are mitigated and kept to a minimum.	
WLDC 9.49	WLDC identify the following positive cumulative impact during operation: 1. The cumulative uplift in local housing requirement of 43 FTE employees could be accommodated in the current 730 dwelling per annum housing stock surplus in the Local Impact Area.	The Applicant agrees that there is anticipated to be a beneficial cumulative impact during operation. This has been assessed in C6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-053] at para. 18.10.42.
WLDC 9.50 WLDC 9.51 WLDC 9.52 WLDC 9.53	WLDC identify the following negative cumulative impacts during operation: 1. The cumulative operation phase of the projects is anticipated to generate a net loss of 62 FTE jobs per annum in the energy sector, accounting for leakage and displacement factors and the 125 energy sector jobs lost as a result of the closure of West Burton A. This represents a decrease of 15.1% in energy employment in the Local Impact Area. 2. The net decrease in energy employment is likely to generate a cumulative GVA loss of £3.0 million per annum. This represents a loss of 1.1% to the agriculture, mining, electricity, gas, water and waste (ABDE) grouped sector economy 3. The cumulative construction phase impacts from the assessed projects are very likely to have a somewhat increased level of effect on tourism and recreation in the immediate locality and Local Impact Area. These include the impacts to the economy already explored, as well as the further economic impacts as a result of cumulative landscape and traffic impacts. The resultant changes are therefore likely to affect the desirability and accessibility of tourism and recreation routes, attractions, and facilities. 4. The uplifts in population will however impact upon the number of people requiring access to local services including primary health services. As such, the Local Impact Area is anticipated to experience a cumulative long-term minor adverse effect, and the Regional Impact Area is anticipated to experience a cumulative long-term negligible adverse effect on access to primary healthcare. This is likely to lead to have secondary cumulative effects of the same respective levels of significance on general population health and wellbeing. Furthermore, these effects are anticipated to lead to cumulative long-term negligible adverse effects to both the Local and Regional Impact Areas with regard to impacts on disability and long-term physical health conditions.	The Applicant agrees that there is anticipated to be adverse cumulative impacts during operation. This has been assessed in C6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-053]. The Applicant has assessed cumulative impacts on energy sector employment at para. 18.10.34. The Applicant seeks to reiterate that the impact is largely as a result of the permanent closure of West Burton A. Nevertheless, this is therefore a significant effect. The Applicant agrees that there is anticipated to be other adverse cumulative impacts during operation. This has been assessed in C6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-053]. The Applicant seeks to reiterate that these impacts are not significant. The assessment of these effects is found at the following paragraphs: 2. Paragraph 18.10.45; 3. Paragraph 18.10.51-55; and 4. Paragraph 18.10.40.
WLDC 21.13	WLDC identify the following positive cumulative impact: <i>"The uplifts in employment and skills training and education opportunities are anticipated to have significant beneficial effects on human health and wellbeing as a result of improved measures of indices of multiple deprivation. The level of significance is not however anticipated to be increased by cumulative effects."</i>	The Applicant agrees that there is anticipated to be a beneficial cumulative impact as a result of increased employment and skills training and education opportunities. This has been assessed in C6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-053] at paragraph 18.10.44 and Table 18.28.
WLDC 21.15 WLDC 21.16	WLDC identify the following negative cumulative impact: <i>"Cumulative effects during construction on long distance recreation routes are anticipated to have a peak cumulative moderate adverse effect, specifically on the Trent Valley Way. This has</i>	The Applicant agrees that whilst there are adverse cumulative impacts on the impacts to PRowS and long distance recreational routes (specifically only the Trent Valley Way) at para. 18.10.31 in C6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-053] are a significant effect, the residual cumulative effects on other human health receptors as set out at para. 18.10.40 are not significant.

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	<p><i>a secondary impact on public health and wellbeing as a result of decreased desirability and use of a recreational walking route.</i></p> <p><i>The residual cumulative effects on other human health receptors, such as access to primary healthcare, disability and long-term health, self-assessed health, and on access and use of outdoor recreation centres for adults and for youths are not anticipated to be significant."</i></p>	
WLDC Table 22-1	<ol style="list-style-type: none"> 1. <i>"The combined effect of the construction of the cumulative developments is likely to bring considerable additional employment to the local economy.</i> 2. <i>If all the schemes are to be realised at the same time, there will be considerable additional employment demand from some of the cumulative schemes. Most cumulative schemes, however, will not generate considerable operational employment due to their nature as infrastructure or utilities projects.</i> 3. <i>In considering the significant workforce requirements for all the Schemes, particularly if all four proposed solar farms in West Lindsey were granted, there are concerns over whether there is a sufficient workforce nationally to meet demand. It can therefore be surmised that if the workforce and skills are divided between the projects, then the construction period for the schemes could go beyond the 24 months proposed in the ES.</i> 4. <i>The Applicant considers that the Scheme will result in 17 FTE agricultural sector jobs. For West Burton the estimate is 13 and for Gate Burton the estimate is 2. this would see the loss of at least 32 FTE agricultural sector jobs in West Lindsey. However, these figures do not take into account contractor services related to the farm business in the area."</i> 	<ol style="list-style-type: none"> 1. The Applicant agrees that there is anticipated to be a beneficial cumulative impact on employment and to the economy during construction. This has been assessed in C6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-053] at para. 18.10.9 and 18.10.21. The Applicant seeks to reiterate that the peak uplift in construction employment, and uplift to GVA in the construction economy in the Local Impact Area are significant beneficial effects. 2. The Applicant agrees that the cumulative total employment from the projects is substantial during construction, as assessed at para. 18.10.14, and is comparatively much smaller during the projects' operational lifetimes, as assessed at para 18.10.34-38. 3. The Applicant is aware that the four proposed NSIPs would require a significant construction workforce. However, there is confidence that the skillset required for the construction of the Scheme (and by virtue of similarity the other NSIPs) can sufficiently be met, particularly with regard to more generalised construction labour as set out in Table 3.1 of C7.10 Skills Supply Chain and Employment Plan [APP-349]. The assessed timetables for construction are an earliest possible timeframe, and thus the construction overlap of all 4 NSIPs is a worst-case scenario. Furthermore, the Scheme has sufficient flexibility built into the construction timetable to ensure peaks in construction demand can be adapted to respond to employment market conditions. 4. The assessed cumulative worst-case loss of 41 FTE agricultural jobs as a result of the cumulatively assessed projects in the West Lindsey and Bassetlaw Districts is not a significant effect, as set out in para. 18.10.35 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 land being used for the solar projects, 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, either when the Scheme is considered in isolation, or cumulatively with other NSIPs in the Till Valley area of West Lindsey. As a result, these effects have not been assessed.
WLDC Table 22-1	<ol style="list-style-type: none"> 1. <i>"There will be cumulative effects during construction on long distance recreation routes that are anticipated to have a peak cumulative moderate adverse effect, specifically on the Trent Valley Way. This has a secondary impact on public health and wellbeing as a result of decreased desirability and use of a recreational walking route.</i> 2. <i>The construction of Cottam, Gate Burton and West Burton could create a peak of 1,886 workers, which could have implications on access to healthcare services. It must be noted that this does not take into account the approximate 500 FTE workforce required for Tillbridge. This has not been considered in the cumulative effects chapter."</i> 	<ol style="list-style-type: none"> 1. The Applicant agrees that whilst there are adverse cumulative impacts to PRoWs and long distance recreational routes, assessed at para. 18.10.31 in C6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-053], however the Applicant seeks to reiterate that only the impact on the Trent Valley Way is a significant effect. The residual cumulative effects on other human health receptors as set out at para. 18.10.40 are not significant. 2. The Applicant is aware that the cumulative increase in construction workers across all 4 NSIPs in West Lindsey will have a level of impact on access to healthcare. The impact of additional workers who may need to move to the area has been assessed at para. 18.10.15-16 in C6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-053]. This assesses a likely relocation of 225 employees into the Local Impact Area, constituting a 0.1% population increase. The assessment of impact on access to healthcare, and secondary impacts on population health and wellbeing concludes that these impacts are not significant.
WLDC 23.15	WLDC summarises on Socio Economics, Tourism and Recreation:	Whilst the Applicant agrees with the summary statement made by West Lindsey District Council, it is necessary to reiterate that each of these impacts is either temporary or reversible at the conclusion of the Scheme's

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WLDC 23.16 WLDC 23.17 WLDC 23.18	<p><i>"The Applicant recognises that there is a limited accommodation in the Local Impact Area. This will result in an oversubscription during the peak construction months meaning that there will not be enough temporary accommodation. This impact would be amplified if the cumulative schemes were to be constructed at the same time.</i></p> <p><i>As set out above, the Applicant recognises that during the operational the Scheme will have a long term impact on the landscape character of some tourism and recreation receptors that are reliant on the landscape context for their value, such as viewpoints, landmarks, and cultural heritage assets. This, along with construction impacts, will also mean reduced spending in the visitor and tourism economy.</i></p> <p><i>There will also be a loss of agricultural jobs that are unlikely to return after nearly half a century.</i></p> <p><i>The Applicant estimates that there are 17 FTE agricultural job losses; however, this does not take into account the contractor services that are employed by the affected farm businesses."</i></p>	decommissioning, and that none of these impacts when considered in isolation, in combination, or cumulatively are assessed to be significant in C6.2.18 ES Chapter 18 Socio Economics Tourism and Recreation [APP-053].
Soils and Agriculture (including Land Use)		
BDC pg.14	In terms of agricultural land, the cabling corridor contains best and most versatile agricultural land. It is considered that providing the majority of the cabling route land can be restored for agriculture then this is acceptable in policy terms.	Detailed ALC assessment work has not yet been undertaken for the cable route corridor. This will be completed post consent and will provide data on soil physical characteristics to inform a Soil Management Plan (SMP). The Draft Development Consent Order (C3.1B [REP-006]) Requirement 19 ensures that the development works will not progress without an agreed SPM. Cabling works in the cable route corridor will be short in duration, cover a modest area of land, and with work subject to an agreed SMP, retention of the existing ALC grade is considered routine.
LCC 13.11 LCC Appx C	<i>"The Council commissioned Landscape to produce a report 'Review of Soils and Agricultural Land Classification for Cottam attached at Appendix C which provides a detailed review of the impact of the proposal on the agricultural land affected by the proposal."</i>	The Applicant notes this comment.
LCC 13.13 LCC 13.14	<p><i>"The survey work has been undertaken using recognised competent operators and surveyed in line with the 1988 Guidelines and TAN 049. The work has been undertaken at 1 borehole per hectare and occasional soil pits dug, with laboratory reports of soil samples to verify soil texture.</i></p> <p><i>The report has checked calculations and background data used and as far as can be established the information is correct."</i></p>	The Applicant notes this comment.
LCC 13.20	<i>"Four farm businesses are identified to manage the land within the site. All are owners of the land occupied and all own and occupy additional land outside of the site area. Each unit is described in summary with the stated impact, but that income from the solar farm would more than compensate for the loss of mainly arable farm land."</i>	The Applicant notes this comment.
LCC 13.21 LCC 13.22	<p><i>"The loss of otherwise productive farmland is not particularly covered in the application documents on the basis that the majority is not BMV. However it does represent a significant area of agricultural land particularly when considering the wider cumulative impact on farmland across Lincolnshire and the West Burton, Tillbridge and Gate Burton schemes locally.</i></p> <p><i>Therefore, whilst the application involves the loss of a modest amount of BMV (around 4% 48 ha) the Council consider that for the reasons set out above and the more detailed report attached at Appendix C there is a negative impact on BMV which is consequently contrary to the requirements of Policy S67."</i></p>	<p>Farmland is not permanently lost to the Scheme. Arable use of the land is temporarily curtailed for the duration of the Scheme; see paragraph 19.9.1 of C6.2.19_A ES Chapter 19 Soils and Agriculture Revision A [REP-010]. The land does not cease to be agricultural land if not cropped.</p> <p>The Applicant agrees that at approximately 4%, the extent of BMV land within the Sites is modest. This resource of BMV land is not lost to or degraded by the proposed development as there is a commitment secured in the DCO (C3.1B [REP-006]) to decommission the Scheme. As this site is noted to contain a modest extent of BMV land it is likely that most viable alternative site would involve the use of more BMV land. Were any alternative sites found that involved the use of a lower proportion BMV land, the area concerned would be small and of negligible weight</p>

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		<p>in the wider planning balance. Therefore, we disagree with LCC's opinion that the Scheme would result in a negative impact on BMV land and contrary to the requirements of Policy S67. Section 6.7 of C7.5_B Planning Statement Revision B [EN010133/EX2/C7.5_B] confirms that the scheme is compliant with local planning policy including Policy S67.</p>
<p>WLDC 12.1</p>	<p>WLDC raise the following points arising from the review of the Soils and Agriculture chapter of the ES:</p> <ol style="list-style-type: none"> 1. IEMA Guidance has been utilised for assessing impact on agricultural holdings. However, the publication is principally concerned with soil functions and does not provide methodology for assessing impacts on agricultural holdings. 2. It is not clear if any tenants are displaced, if so, this would be an additional socio-economic adverse effect. 3. The cumulative assessment is based on the 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 these sites were likely unavailable; 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. 	<ol style="list-style-type: none"> 1. As noted in paragraph 19.6.8 of C6.2.19_A ES Chapter 19 Soils and Agriculture [REP-010], the current IEMA guidance continues the guidance on farming circumstances that was previously provided in PPG7 and the DMRB. There is no alternative guidance giving a more structured methodology for the assessment of effects upon a farm business. 2. Paragraph 7.1.1 of C6.3.19.1 ES Appendix 19.1 Agricultural Land Quality Soil Resources and Farming Circumstances [APP-145] notes that all four agricultural occupants within the sites are the owner occupiers of that land. 3. The cumulative assessment was undertaken using the best available published information on ALC grade at the time as explained in paragraph 19.11.3 of the ES Chapter 19 (C6.2.19A [REP-010]). Paragraph 19.11.5 notes that there will be no permanent loss of agricultural land resource for the cumulative sites.
<p>WLDC 12.12 WLDC 12.13</p>	<p>WLDC has identified no positive and no neutral impacts during construction.</p>	<p>The Applicant notes this comment.</p>
<p>WLDC 12.14 WLDC 12.15 WLDC 12.16</p>	<p>WLDC identify the following negative impacts during construction:</p> <ol style="list-style-type: none"> 1. <i>Construction work will start the temporary curtailment of arable production within the Site. The land does not cease to be agricultural land whilst cropping or grazing is suspended while construction work is taking place and there is no actual loss of agricultural land resource, therefore no mitigation is proposed. The residual effect of construction on the agricultural land resource is considered minor and not significant.</i> 2. <i>Solar panel construction work will involve trafficking the land in a similar manner to the current arable land use, where high axle vehicles are regularly used (e.g. combine harvesters). Heavy plant use during construction will include excavators for digging trenches and cranes for placing substation and storage modules. The Soil Management Plan (SMP) (outline SMP provided in EN010133/APP/C6.3.19.2) is embedded mitigation that aims to conserve the soil resource through construction activity and therefore no additional mitigation is proposed. The resulting short term, reversable and local effect of construction disturbance on the soil resource across the Scheme is considered minor and not significant.</i> 3. <i>The temporary curtailment of farming practices for each of the four farming businesses will result in a reduction in cropped area for these enterprises. This is considered as a constraint however farming practices will not be entirely terminated for these businesses – only the land that is occupied by the Scheme. The resulting short term, reversable and local effect of construction disturbance on the farm businesses occupying land within the Sites will be a minor impact and not significant.</i> 	<p>The Applicant notes this summary by WLDC of parts of the ES Chapter 19 (C6.2.19A [REP-010]). Relevant paragraphs include 19.9.1, 19.9.5 and 19.9.9</p>

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WLDC 12.17 WLDC 12.18	WLDC has identified no positive and no neutral impacts during operation.	The Applicant notes this comment.
WLDC 12.19	<i>"There will be no loss of agricultural land resource during operation. With no change there is no mitigation proposed and there will be a negligible impact, which is not considered significant."</i>	The Applicant notes this summary by WLDC of parts of the ES Chapter 19 (C6.2.19A [REP-010]). Relevant paragraphs include 19.9.12
WLDC 12.20	WLDC identify the following positive impact during decommissioning: <i>"Decommissioning of the Scheme will allow a return to arable management of the land. The resulting short term, reversible and local effect of decommissioning on the return of agricultural land to the enterprises of the occupying farm businesses will be a minor impact, beneficial and not significant. No further mitigation is proposed."</i>	The Applicant notes this summary by WLDC of parts of the ES Chapter 19 (C6.2.19A [REP-010]). Relevant paragraphs include 19.9.27
WLDC 12.21	WLDC identify the following neutral impact during decommissioning: <i>"It is noted that there is an intention to return the land to agricultural land. No obstructions will be left in the soil that could interfere with cultivation (e.g. cables will be removed) and no changes to the physical characteristics of the soil will have taken place that could influence ALC grade. There will be a negligible impact, that is not considered to be significant. No mitigation is proposed."</i>	The Applicant notes this summary by WLDC of parts of the ES Chapter 19 (C6.2.19A [REP-010]). Relevant paragraphs include 19.9.20
WLDC 12.22	WLDC identify the following negative impact during decommissioning: <i>"Decommissioning will involve activities similar to that during construction, including trafficking the land in a similar manner to the current arable land use (e.g. combine harvesters). The measures from the SMP also extend to decommissioning and land restoration and it will limit impacts to the soil resource. The SMP covers the appropriate handling of stored soil, aftercare of the land and identification of remediation of any areas of compacted soils. The resulting residual impacts will be short term, reversible and localised, which is considered to be a minor impact that is not significant."</i>	The Applicant notes this summary by WLDC of parts of the ES Chapter 19 (C6.2.19A [REP-010]). Relevant paragraphs include 19.9.23 to 26.
WLDC 12.24	WLDC has identified no positive cumulative impacts.	The Applicant notes this comment.
WLDC 12.25 WLDC 12.26 WLDC 12.27 WLDC 12.28	WLDC identify the following neutral cumulative impacts: <ol style="list-style-type: none"> <i>"For the Loss of Agricultural Land Resource, all six cumulative effect sites will be temporary and time limited development, with any actual loss of agricultural land limited to the small extent of switchgear housings and substations. Therefore the residual effect of each of these six sites on the agricultural land resource is predicted to be negligible, as for Cottam."</i> <i>The soil resource present at each of the six cumulative sites will experience little disturbance, and the risk of compaction from trafficking reduced (lower frequency, lower weight and able to avoid wet conditions) when compared to annual arable crop management. Therefore the residual effect of each of these six sites on the soil resource is predicted to be negligible, as for Cottam."</i> <i>Some farm businesses occupying land within the six cumulative sites may have elevated sensitivity to a solar farm development in comparison to the four farm businesses at Cottam. For instance a farm business may have a full agricultural tenancy providing security of tenure which if obliged to vacate, would be very difficult to replace. However without any published detail on the occupancy of the six cumulative sites, there is no justification to claim any greater significance of effect than</i> 	The Applicant notes this summary by WLDC of parts of the ES Chapter 19 (C6.2.19A [REP-010]). Relevant paragraphs are contained in Section 19.11, Cumulative Effects

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	<p><i>at Cottam. Therefore the residual effect of each of these six sites on farm businesses is predicted to be negligible, as for Cottam.</i></p> <p>4. <i>The only plausible interaction between the six cumulative sites and Cottam is agricultural occupancy by a farm business across multiple different sites. If this does occur it is likely to not be a significant adverse effect for that farm business, but an assessment would not be possible without the farming circumstances baseline for the affected unit. There will be no interaction of impact for soils or agricultural land resource between any of the sites. There is therefore no significant cumulative effect identified for soils and agriculture for the six cumulative sites."</i></p>	
WLDC 12.29	<p>WLDC has made no comment on negative cumulative impacts: [paragraph missing at 12.29: reads "There are no positive impacts identified."]</p>	The Applicant notes this comment.
Transport and Access		
BDC pg.14	<p><i>"Nottinghamshire County Council is the Highway Authority for the District. It is therefore requested that the examiner refers to their comments in respect of highway and transport issues, including public rights of way. It is anticipated that as the cabling is underground that the main disruption to public rights of way would be during the construction phase."</i></p>	<p>An Outline Public Rights of Way Management Plan (PROWMP) has been prepared to support the application within C6.3.14.3_B Appendix 14.3 Outline Public Rights of Way Management Plan Revision B [EN010133/EX2/C6.3.14.3_B].</p> <p>Information on how public rights of way will be managed during the construction of the cable route is set out from paragraph 3.4. of the PROWMP. Management measures will be in place to ensure the safety of public rights of way users at all times. As set out in paragraph 3.8 of the PROWMP, <i>"when the cable is installed, there will be there will be some instances where the PROW needs to be closed to users for a short period. This will not occur at all PROWs, as directional drilling will be used in some places. Where there is a requirement to temporarily close the PROW, works will be undertaken over-night so far as is practicable to do so, when there are unlikely to be any PROW users. It is anticipated that the installation of cables over short sections where the PROW is located can be undertaken in a single overnight period. The PROW will remain open, and managed, during the daytime period so far as is practicable to do so"</i>.</p>
LCC 8.6	<p><i>"There is still a need to ensure that the DCO provides a mechanism for the Highway Authority to review and provide the necessary specification for works in the Highway that would normally be captured via a Section 278 Agreement and the mechanism as how this will be achieved is still under discussion in the drafting of the DCO. At this stage however, the Council concludes that traffic and transport impacts during the construction, operation, and decommissioning (subject to agreement of a CTMP) would be neutral."</i></p>	<p>The Applicant notes that this point was discussed at the Issue Specific Hearing on 7 September 2023, and refers LCC to agenda item 5g in the Written Summary of the Applicant's Oral Submissions & Responses at Issue Specific Hearing 1 and Responses to Action Points [REP-051].</p> <p>Article 14 of C3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C] 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 draft DCO includes Lincolnshire County Council as the highways authority.</p>
NCC 2.72 NCC 2.73 NCC 2.74 NCC 2.75	<p>Nottinghamshire County Council are the Highway Authority for area.</p> <p>The construction and operation of the project would have only a minor and largely temporary impact on the Nottinghamshire road network. However, the proposal would be connected to the National Grid at Cottam Power Station which would involve works within the County relating to the laying of a cable within the proposed grid connection corridor. The grid connection corridor for the Gate Burton Solar Project covers a similar area, and it is likely that so would the grid connection corridor for the Tillbridge Solar Project. The West Burton Solar Project in part would also share the same grid connection corridor where it crosses the River Trent.</p> <p>Construction accesses to the grid connection corridor are proposed on Torksey Ferry Road (Grid Connection Access 1/101), Cottam Road (Grid Connection Access 2/102, 3/103,</p>	<p>The Applicant is working collaboratively with the developers of the other solar projects on the Shared Cable Route elements of the Scheme and the developers are seeking to share accesses for this section of the cable route.</p> <p>The C6.3.14.2_B ES Appendix 14.2 Construction Traffic Management Plan [EN010133/EX2/C6.3.14.2_B] Is to be updated as part of Deadline 2 to include updated information on cable route accesses and vehicle routing. As part of this, the vehicle route will be amended to avoid the village of Rampton and in accordance with the Gat Burton Route.</p> <p>Along the Shared Cable Route Corridor, it is the intention that construction compounds will be shared, and where practicable cables installed as part of the same operation. Paragraph 4.3.6 of C6.2.4 ES Chapter 4 Scheme Description Revision A [REP-012] states that: The cumulative environmental effects of the simultaneous or sequential construction of these cables has been assessed in the ES. This is in order to seek to minimise potential environmental effects and identify the benefits of combined construction activities. To accommodate the potential</p>

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	<p>and 4/104), and Headstead Bank (Grid Connection Access 5/105 and 6/106). To minimise disruption, these accesses should be shared with the other solar projects where applicable, and therefore, should be of the same design and position. It is noted that access is proposed via Torksey Ferry Road which would route construction traffic through Rampton. This is not proposed as part of the Gate Burton Solar Project. The Highway Authority therefore question whether this is necessary. Cottam Road is a far superior route avoiding the village.</p> <p>Where practical each solar project should share construction compounds. Each Construction Traffic Management Plan will need to set out arrangements for managing arrivals and departures at each access. Where possible, works required within the grid connection corridor for each project should be undertaken as a single operation.</p>	<p>sequential installation of all three projects' ducts and cables, a five-year construction duration is adopted for this, and assessed in this ES.</p>
<p>WLDC 10.1</p>	<p>WLDC summarises the main points arising from the review of the Transport and Access chapter of the Environmental Statement:</p> <ol style="list-style-type: none"> 1. The traffic survey data used to derive the baseline is from 2017 and 2019, which is before the Covid-19 pandemic restrictions. Nonetheless, this traffic data is now quite historic, with some of the data being more than five years old. Therefore, more recent traffic surveys should be considered to verify that the derived baseline traffic flows are representative of current day conditions. 2. It is unclear if the potential environmental effects due to any temporary highway works necessary to accommodate access by large construction vehicles and abnormal loads, that may require the removal of hedgerows for example, have been covered by the ES. 3. It is noted that deliveries will peak hours where possible; however, no reasons are provided as to why this might not be possible [sic]. 4. Collectively the Scheme is proposing 48 access points. It is questioned [why] so many accesses are needed and highlights the issue around the use of a 'network of sites'. 5. It is noted that there will be 'a small number of abnormal load movements to transport large transformers'; however, exact numbers are not provided. This would be helpful when assessing the cumulative impact of Abnormal Indivisible Loads (AIL) for the other solar schemes. 6. 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. 7. The cumulative effects chapter is very limited and only appears to consider the routes associated with the construction routes for Cottam. Whilst this is understood for the purpose of this assessment, the cumulative impact of construction traffic should be considered as there is the potential for the schemes to affect WLDC for five or more years or more that is associated with the construction of the shared grid connection corridor. 	<ol style="list-style-type: none"> 1. As set out paragraph 14.5.32 of the C6.2.14 ES Chapter 14_Transport and Access [APP-049] traffic surveys were undertaken in November 2021. This statement is replicated in Paragraph 2.15 of the C6.3.14.1_A ES Appendix 14.1 Transport Assessment Revision A [EN010133/EX2/C6.3.14.1_A]. Data for the A361 and A15 is taken from the DfT Road Traffic Statistics database for 2019. At the time of writing, 2021 or 2022 data was not available, and 2020 data was not used because of the Covid-19 Pandemic. 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 the future changes in traffic flows. Therefore, the traffic flows are robust. 2. The environmental effects of the removal of hedgerows is considered in C6.2.9 ES Chapter 9_Ecology and Biodiversity [APP-044] In certain locations where existing 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_B Outline Landscape and Ecological Management Plan Revision B [EN010133/EX2/C7.3_B] (the 'OLEMP') which is revised and secured by Requirement 7 of Schedule 2 of C3.1_C Draft Development Consent Order Revision C [EN010133/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 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. 3. As set out in the C6.3.14.2_B ES Appendix 14.2 Construction Traffic Management Plan [EN010133/EX2/C6.3.14.2_B] in Section 6, measure 'vii' Construction deliveries by HGV will be coordinated to arrive/depart between 09:30-16:30 to avoid the network peak hours of 08:00-09:00 and 17:00-18:00. Measure 'xi' is for a booking system. This will manage arrivals and departure times to avoid the peak hours. There may be instances when arrival/departure is avoidable, likely because of supply chain issues or traffic delays elsewhere on the network. However, the aim, through the outline CTMP is to avoid peak hour arrivals and departures as much as possible. 4. 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

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		<p>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 ES Appendix 14.1 Transport Assessment [APP-134], 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 [APP-134].</p> <ol style="list-style-type: none"> 5. Information on Abnormal Indivisible Load (AIL) movements is set out in Section 7 on the C6.3.14.1 ES Appendix 14.1 Transport Assessment [APP-134] and Section 6 of the C6.3.14.2_B ES Appendix 14.2 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 ES Appendix 14.1 Transport Assessment [APP-134] 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 ES Appendix 14.1 Transport Assessment [APP-134] 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. 6. As set out in paragraph 9.15 of the C6.3.14.1 ES Appendix 14.1 Transport Assessment [APP-134], each access along the Cable Route Corridor will only generate traffic flows for 90 days so any associated effects will be very temporary. Each access on the Cable Route Corridor is only forecast to generate eight arrivals and eight departures per day (half by 10m tipper, half by LGV), so the effects will not be significant. 7. 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 Revision A [EN010133/EX2/C6.3.14.1_A] The cumulative effects sections only consider routes that will be used by construction vehicles associated with the Cottam Scheme. For these routes, the assessment has taken into account the traffic flows associated with other schemes. For routes used by other schemes but not Cottam, the effects should be considered as part of the other, separate, applications for consent for those schemes. It is forecast that the construction phase for Cottam will last for up to 24 months. However, a cumulative five year construction period for the shared cable route to be constructed for all of the Schemes sequentially has been considered. This represents a worst case scenario.
WLDC 10.12	WLDC has identified no positive impacts during construction.	The Applicant notes this comment.
WLDC 10.13 WLDC 10.14	WLDC has identified the following neutral impacts during construction: <ol style="list-style-type: none"> 1. <i>"Construction vehicles will avoid travel during the network peak hours where possible. Therefore, deliveries will be scheduled for between 09:30 and 16:30 where possible."</i> 2. <i>The Applicant states that the level of pedestrian and cyclist activity on the roads surrounding the Site is very low meaning that the sensitivity receptor is low. However, the impact to pedestrian amenity acknowledges that the addition of HGVs to the network will affect the relative pleasantness of any pedestrian and cyclist journeys in the area. It is also acknowledged that a number of Public Rights of Way operate through the Site, although usage is relatively low. Notwithstanding this, there will be some effect on the relevant pleasantness of pedestrian journeys in these locations."</i> 	<ol style="list-style-type: none"> 1. The Applicant notes this comments 2. The likely effects on pedestrian and cyclists delay and amenity is set out in Cumulative effects are set out in ES Chapter 14: Transport and Access [APP-049]. It is concluded that there will be temporary minor effects. The C6.3.14.2_B ES Appendix 14.2 Construction Traffic Management Plan [EN010133/EX2/C6.3.14.2_B] and C6.3.14.3_B Appendix 14.3 Outline Public Rights of Way Management Plan Revision B [EN010133/EX2/C6.3.14.3_B] sets out management measures to ensure the safety of all of pedestrians and cyclists.

LIR Ref.	Summary	Applicant's Response
WLDC 10.15 WLDC 10.16 WLDC 10.17 WLDC 10.18	<p>WLDC has identified the following negative impacts during construction:</p> <ol style="list-style-type: none"> 1. <i>"On a day-to-day basis, the largest vehicle that will be used to deliver equipment to the Site will be a 16.5m articulated vehicle, although a significant proportion of movements will be by smaller vehicles. There will be an average HGV Arrivals and Departures per Day of 38 (76 Trips). During peak construction this will increase to an average of 58 (116 Trips).</i> 2. <i>On an average day, there is expected to be 450 workers spread across the Sites. To account for peak periods at the different Sites, 600 construction workers has been taken forward for assessment as a reasonable worst case. For the assessment, construction workers have been spread across the Sites on a proportional basis. Based on a total of 650 construction workers (including 50 at the Energy Storage Facility), the forecast number of cars/LGVs are a total of 233 cars and LGVs (466 trips).</i> 3. <i>Where links within the study area connected to public rights of way, it could be argued that an increase in traffic as a result of the construction phase could make it more difficult to cross the road. On Stow Lane, for example, there is forecast to be an additional 286 two-way movements over the course of a day during the construction phase. This is a 39% increase compared to the base. However, over the course of a 10 hour working day, this relates to less than one vehicle every two minutes, which will not make it significantly harder to cross the road. Therefore, the effects on severance in these locations will be minor.</i> 4. <i>It is forecast that each access for the Cable Route Corridor / Grid Connection Route will generate up to eight arrivals and eight departures per day for the delivery of material and equipment (16 trips). Around half of these will be HGV trips and half LGV trips. There will also be around 10 construction workers per access, arriving by car and shuttle bus. In total this means that there will be 256 vehicles (512 trips) in relation to the cabling element of the works."</i> 	<p>HGV trips will be spread around the different accesses that make up the Sites. No single access/route will see 58 HGV arrivals on a single day. The distribution of movements around the network is summarised in Section 6 of the C6.3.14.1_A ES Appendix 14.1 Transport Assessment Revision A [EN010133/EX2/C6.3.14.1_A]. Movements will also be spread throughout the day. An indicative construction vehicle trip profile is shown in Table 5.3 of the Transport Assessment. Based on a flat profile throughout the day which avoids the AM peak hour and PM peak hour, there will be 7/8 HGV arrivals per hour spread across the network during peak construction.</p> <ol style="list-style-type: none"> 2. As above, the car/LGV trips will be spread around the difference accesses that make up the Sites. The distribution of movements around the network is summarised in Section 6 of the C6.3.14.1_A ES Appendix 14.1 Transport Assessment Revision A [EN010133/EX2/C6.3.14.1_A]. 3. As set out in the ES Chapter 14: Transport and Access [APP-049] it is acknowledged that minor effects are associated with pedestrian delay. Significant delays to pedestrians are not expected. These are temporary for the construction phase. Once operational, effects will be negligible. The C6.3.14.2_B ES Appendix 14.2 Construction Traffic Management Plan [EN010133/EX2/C6.3.14.2_B] and C6.3.14.3_B Appendix 14.3 Outline Public Rights of Way Management Plan Revision B [EN010133/EX2/C6.3.14.3_B] sets out management measures to ensure the safety of all of pedestrians and cyclists. 4. This is not correct. As set out in Paragraph 4.14 of the C6.3.14.1_A ES Appendix 14.1 Transport Assessment Revision A [EN010133/EX2/C6.3.14.1_A], the cable route corridor will be built out in sections over a 24-month period. It has been estimated that each section will be approximately 4.4km with approximately four accesses. Each section will take approximately 90 working days to construct. The daily trip generation of the construction of the cable route corridor is set out in Paragraph 5.19 of the TA. On an average day, there could be up to 16 HGVs, 16 LGVs, and 40 car arrivals spread over four accesses (assuming all workers drive in single occupancy cars). This relates to 72 arrivals and 72 departures per day spread over four accesses (18 arrivals and 18 departures at each access). As stated, each access will only be required by approximately 90 days. <p>For all of these points, the C6.3.14.2_B ES Appendix 14.2 Construction Traffic Management Plan [EN010133/EX2/C6.3.14.2_B] and C6.3.14.3_B Appendix 14.3 Outline Public Rights of Way Management Plan Revision B [EN010133/EX2/C6.3.14.3_B] are the mechanisms by which the temporary traffic effects will be managed during the construction phase. These will be secure through Requirement 15 and Requirement 18 of the DCO respectively.</p>
WLDC 10.19	<p><i>"During the Scheme's operational phase, there are anticipated to be around five visits to each Site per month for maintenance purposes. These would typically be made by light van or 4x4 type vehicles. Whilst each Site construction compound will have been removed at the end of the construction phase, space will remain within each Site on the access tracks for such a vehicle to turn around to ensure that reversing will not occur onto the highway."</i></p>	The Applicant notes this comment.
WLDC 10.20	<p><i>"The Scheme is anticipated to have a design life of approximately 40 years. At the end of the Scheme's operational life it will be decommissioned. The number of vehicles associated with the decommissioning phase are not anticipated to exceed the number set out for the construction phase."</i></p>	The Applicant notes this comment. The decommissioning requirement specifies that the operational life of the Scheme must be no more than 60 years (see requirement 21(1) in Schedule 2 to C3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_B])
WLDC 10.21	<p>6. <i>"Traffic flows associated with the cumulative schemes will only affect links in the study area that have a low sensitivity. These roads are less sensitive to change compared to</i></p>	6. The cumulative assessment is set out in Section 10 of the C6.3.14.1_A ES Appendix 14.1 Transport Assessment Revision A [EN010133/EX2/C6.3.14.1_A]. The key roads that will be affected if all schemes

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WLDC 10.22 WLDC Table 22-1	<p><i>the more local/rural roads within the network, which will not be affected by the cumulative schemes. The percentage change on these roads is low. It should also be noted that it is incredibly unlikely that a scenario will occur whereby all cumulative schemes are constructed at the same time.</i></p> <p>7. <i>The cumulative effects on the local highway network surrounding the Grid Connection Route will also be low, as the cumulative Schemes will not use the same routes. It should be noted that sections of the Grid Connection Route for the Scheme will be shared with Gate Burton and West Burton, although the residual effects will not change as a result of this.</i></p> <p>8. <i>Based on Gate Burton's ES, if the Cottam, Gate Burton, Tillbridge and West Burton solar farm proposals were to commence at similar times, a worst case scenario would result in approximately 160 HGV vehicles using the local road network per day if peak construction was to coincide with all four schemes.</i></p> <p>9. <i>Any overlaps between the construction vehicle trips associated with the Scheme and other schemes are likely to be primarily confined to wider strategic routes. Other schemes are not likely to contribute to the effects on transport and access receptors (including the A156, Kexby Lane, Willingham Road, Marton Road, and the A1500 in Lincolnshire and Cottam Road, Headstead Bank, Broad Lane, Cow Pasture Lane and Town Street in Nottinghamshire)"</i></p>	<p>are constructed at the same time are the A15, A1500 and A631. All of these roads are A-Roads. The more local roads that make up the construction vehicle routes for Cottam will not be used by the other cumulative schemes.</p> <p>7. As set out in Paragraph 4.14 of the C6.3.14.1_A ES Appendix 14.1 Transport Assessment Revision A [EN010133/EX2/C6.3.14.1_A], the cable route corridor will be built out in sections over a 24-month period. It has been estimated that each section will be approximately 4.4km with approximately four accesses. Each section will take approximately 90 working days to construct so will be very temporary in nature.</p> <p>8. In the very unlikely case that peak construction coincides for all four schemes, this statement is broadly correct. However, the 160 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.</p> <p>9. As stated in point 6, the key roads that will be affected if all schemes are constructed at the same time are the A15, A1500 and A631. All of these roads are A-Roads. The more local roads that make up the construction vehicle routes for Cottam will not be used by the other cumulative schemes.</p>
WLDC 23.21 WLDC 23.22	<p>WLDC summarises on Transport and Access:</p> <p><i>"Traffic during the construction of the Scheme is a key concern. Whilst this Scheme would likely be acceptable given the contained nature of the site, it is the cumulative effects that would impact West Lindsey if the Cottam, Tillbridge and West Burton schemes were all to be in their construction periods at the same time.</i></p> <p><i>The cumulative construction traffic routes are shown clearly at Appendix B and demonstrate the impact on the West Lindsey with the majority of the district affected."</i></p>	<p>The Applicant notes these comments. Lincolnshire County Council is the highway authority for the WLDC area. It should be noted that, in the Lincolnshire County Council LIR it is stated that <i>"the Council considers that the assessment within the Transport and Access Chapter 14 and draft Construction Environmental Traffic Management Plan is appropriate and provides a reasonable estimate of HGV and car traffic associated with the development during construction and shows that the impact will be within acceptable levels on the highway network"</i>. It goes on to state, <i>"the Council concludes that traffic and transport impacts during the construction, operation, and decommissioning (subject to agreement of a CTMP) would be neutral"</i>.</p>
Waste		
LCC 11.5	<p><i>"In respect of Policy W1 this requires the Council to make provision for sites to meet predicted future capacity gaps for waste arisings. Currently there are no waste facilities to process discarded solar infrastructure as it is replaced during the lifetime of the development and at the decommissioning stage. When combined with the other solar projects in the County that may be granted DCOs in the next 12 months this will present an issue that will need additional facilities to ensure these products are sustainably disposed of. Therefore, it will be necessary for a requirement to be imposed on any DCO permitted that requires a waste management strategy to be submitted which demonstrates the expected quantity of solar infrastructure that will be discarded during the operational and decommissioning phases and the arrangements to be put in to ensure adequate facilities are available to sustainably dispose/recycle these items in the future. The Council does however wish to draw the ExA attention to the point relating to not just the predicted decommissioning GHG emissions associated with the recycling or disposal of components and panels at specialist disposal facilities but also the need for replacement infrastructure during the lifetime of the development which is unrestricted and</i></p>	<p>The Applicant is aware of the lack of dedicated facilities at present in Lincolnshire, hence the categorisation of the solar and battery infrastructure as Waste Electrical and Electronic Equipment (WEEE) for the purpose of assessment and identification of existing and future processing capability in the county in C6.2.20 ES Chapter 20 Waste [APP-055]. For decommissioning, the quantum of WEEE from the Scheme has been assessed at para. 20.7.21 and cumulatively with other NSIPs at 20.10.17. In both instances, there is anticipated to be no significant effects to WEEE handling in Lincolnshire or Nottinghamshire. Nevertheless, the Applicant is committed to ensuring WEEE is handled in keeping with "Best Available Treatment Recovery and Recycling Techniques" The Applicant is further committed to a Decommissioning Resource Management Plan as set out in Table 3.1 of C7.2 Outline Decommissioning Statement [APP-338], which is secured by Requirement 21 of Schedule 2 to C3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C].</p> <p>The Applicant does not anticipate that operational and maintenance waste streams arising from the need to replace broken solar panels, infrastructure or batteries will have any greater level of impact on waste handling than at either construction or decommissioning. Furthermore, the powers set out in Part 1 paragraph 5 of C3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C] does not allow for re-powering of the Scheme to occur. As such, these impacts are not significant effects, as assessed in para. 20.7.17-22 in C6.2.20 ES</p>

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	<i>therefore could result in the infrastructure being replaced a number of times during the lifetime of the development. Therefore in this regard it is assessed as having a negative impact."</i>	Chapter 20 Waste [APP-055]. Replacement of broken or faulty equipment is likely to be undertaken in an ad hoc manner, and suitable mitigation is secured in C7.16_A Outline Operational Environmental Management Plan Revision A [EN010133/EX2/C7.16_A] by way of Requirement 14 of Schedule 2 to C3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C].
NCC 2.84	There are no existing waste sites within the vicinity of the site whereby the proposed development could cause an issue in terms of safeguarding existing waste management facilities.	The Applicant notes this comment.
WLDC 19.1	WLDC raise the following points arising from the review of the Waste chapter of the ES: <i>"The Scheme will generate substantial quantities of both construction materials and wastewater. Employee activity will generate commercial, food and sewage waste."</i>	The Applicant has assessed the quantum of construction material waste likely to be generated in Table 20.5 of C6.2.20 ES Chapter 20 Waste [APP-055]. Wastewater from construction is predominantly limited to that used for welfare facilities, and will be removed by tanker to an approved wastewater and sewage treatment centre. As such, this would not give rise to significant environmental effects and is not considered further in the assessment. Employee activity will generate a minimal amount of commercial, food and sewage waste. Commercial and food waste will be managed by appropriate permitted waste carriers and taken to facilities in line with environmental permits and requirements. The Applicant has committed to a Construction Resource Management Plan, secured in C7.1_B Outline Construction Environmental Management Plan Revision B [EN010133/EX2/C7.1_B] by way of Requirement 13 of Schedule 2 to C3.1_C Draft Development Consent Order Revision C [EN010133/EX2/C3.1_C].
WLDC 19.9 WLDC 19.10	WLDC has identified no positive and no neutral impacts during construction.	The Applicant notes this comment.
WLDC 19.11 WLDC 19.12	WLDC identify the following negative impacts during construction: <ol style="list-style-type: none"><i>"Construction activities associated with the Scheme are anticipated to result in waste generation, including construction materials and wastewater. Employee activity will generate commercial, food and sewage waste. The total estimated construction, demolition and excavation (CD&E) waste is 77,400-78,100 tonnes over the 24-month construction period (38,700-39,100 tonnes per annum) which is considered a minor magnitude increase for the Local Impact Area.</i><i>The consequent environmental effects from a temporary, medium term, minor magnitude uplift in CD&E waste are:</i><ul style="list-style-type: none"><i>A neutral or slight adverse effect on recycling, reuse, and waste treatment handling (which is not considered significant in EIA terms).</i><i>A slight adverse effect on landfill waste handling (which is not considered significant in EIA terms)."</i>	The Applicant seeks to reiterate that these impacts from construction waste in Lincolnshire are not significant. The assessment of these effects is found in C6.2.20 ES Chapter 20 Waste [APP-055] at the following paragraphs: <ol style="list-style-type: none">Paragraph 20.7.10; andParagraph 20.7.11.
WLDC 19.13 WLDC 19.14	WLDC has identified no positive and no neutral impacts during operation.	The Applicant notes this comment.
WLDC 19.15	WLDC identify the following negative impacts during operation: <ol style="list-style-type: none"><i>"It is anticipated that waste arising during operation will be minimal and will predominantly be related to the removal of expired or broken equipment that cannot be repaired, and packing material required for replacement material. Waste electrical or electronic equipment (WEEE) arising from the operation and maintenance of the Scheme is anticipated to be limited to worn or broken photovoltaic panels of a negligible quantity. The total estimated CD&E waste to be generated from the Scheme</i>	The Applicant seeks to reiterate that these impacts from operational waste in Lincolnshire are not significant. The assessment of these effects is found in C6.2.20 ES Chapter 20 Waste [APP-055] at paragraph 20.7.20.

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	<p><i>per annum during operation is 190-191 tonnes. Assuming that waste is handled proportionally between Lincolnshire and Nottinghamshire, this constitutes a negligible magnitude increase in CD&E waste handling. The resulting impacts are:</i></p> <ul style="list-style-type: none"> <i>A neutral effect on recycling, reuse, and waste treatment handling (which is not considered significant in EIA terms).</i> <i>A neutral or slight adverse effect on landfill waste handling, as a result of its future very high sensitivity (which is not considered significant in EIA terms). "</i> 	
WLDC 19.16 WLDC 19.17	WLDC has identified no positive and no neutral impacts during decommissioning.	The Applicant notes this comment.
WLDC 19.18	<p>WLDC identify the following negative impacts during decommissioning:</p> <ol style="list-style-type: none"> <i>"The Scheme is anticipated to generate substantive WEEE through decommissioning, including photovoltaic panels, batteries, and substation equipment, as well as other smaller quantities of WEEE from supporting electrical infrastructure. The total WEEE generated from the Scheme's decommissioning is 77,000-85,000 tonnes, of which 7,000-14,000 tonnes is known to be considered as hazardous (batteries). Waste handling facilities for landfill waste handling in Nottinghamshire are likely to see a significant adverse effect during the decommissioning of the Scheme and cumulative decommissioning phase as a result of the lack of landfill capacity from the year 2030. Mitigation is expected to reduce the significance of impact to a slight or moderate adverse effect, which is not significant in EIA terms."</i> 	The Applicant seeks to reiterate that these impacts from decommissioning waste in Lincolnshire are not significant. The assessment of these effects is found in C6.2.20 ES Chapter 20 Waste [APP-055] at paragraph 20.7.35-36.
WLDC 19.20 WLDC 19.21	WLDC has identified no positive cumulative and no neutral cumulative impacts.	The Applicant notes this comment.
WLDC 19.22 WLDC 19.23 WLDC 19.24	<p>WLDC identify the following negative cumulative impacts during decommissioning:</p> <ol style="list-style-type: none"> <i>"The total estimated cumulative construction, demolition and excavation (CD&E) waste to be generated from the Scheme construction is 271,000 tonnes over the combined construction period, estimated to be the four years from 2024-2028. For this cumulative assessment, waste streams are assumed to be consistent across the four years, and as such the waste generated per annum (67,700 tonnes) equates to an uplift in CD&E waste of 3.2% from the combined estimated CD&E waste for Lincolnshire and Nottinghamshire (2024 base year). This is approximately 1.7 times greater than the individual impact of the Cottam Solar Project. Assuming that waste is handled proportionally between Lincolnshire and Nottinghamshire, the cumulative impacts do not change the level of magnitude of the impacts, and thus do not change the significance of the effects from the assessment of Cottam Solar Project in isolation. As such, a moderate or large adverse effect (which is significant in EIA terms) is identified on landfill waste handling in Nottinghamshire, due to the very high sensitivity of the receptor.</i> <i>Waste electrical or electronic equipment (WEEE) arising from the operation and maintenance of the cumulatively assessed projects is anticipated to be limited to worn or broken photovoltaic panels. These are not likely more than negligible quantities of hazardous materials, and as such, it is anticipated that there will be a long-term cumulative negligible magnitude uplift to hazardous waste in the Local Impact Area will</i> 	<p>The Applicant seeks to reiterate that these cumulative impacts from decommissioning waste in Lincolnshire are not significant, and that the Applicant has assessed a significant cumulative effect to landfill waste handling in Nottinghamshire. The assessment of these effects is found in C6.2.20 ES Chapter 20 Waste [APP-055] at the following paragraphs:</p> <ol style="list-style-type: none"> Paragraphs 20.10.16-17; Paragraph 20.10.12; and Paragraph 20.10.13.

LIR Ref.	Summary	Applicant's Response
	<p><i>have the following effects. As such, this does not increase the level of significance of the effects compared to those assessed for the Scheme in isolation.</i></p> <p>3. <i>The level of waste assumed to be generated from decommissioning activities associated with the cumulative projects are anticipated to be 347% more than would be generated for CD&E of the quantity estimated for Cottam Solar Project alone."</i></p>	

