

Cottam Solar Project

Written Summary of the Applicant's Oral Submissions & Responses at Open Floor Hearing 2

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Issue Sheet

Report Prepared for: Cottam Solar Project Ltd
Examination Deadline 3

Written Summary of the Applicant's Oral Submissions & Responses at Open Floor Hearing 2

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1 Introduction and Summary

1.1 Purpose of this document

1.1.1 This document provides Cottam Solar Project Limited (the 'Applicant's') response to oral submissions made by Interested Parties, host local authorities, and statutory consultees at the first Open Floor Hearing (OFH2) relating to the Development Consent Order Application (the 'Application') for Cottam Solar Project (the 'Scheme'). OFH2 was undertaken during the evening of 7 December 2023.

1.1.2 A total of 21 oral submissions were made at OFH2 by Interested Parties in response to Item 4 of to the Examining Authority's (ExA) Open Floor Hearing 1 Agenda [EV-019].

1.2 Structure of the Report

1.2.1 This document provides a written response from the Applicant to those matters raised during OFH2:

- Section 2 provides a summary of the Applicant's Oral Submissions at OFH2; and
- Section 3 provides the Applicant's responses to Oral Submissions made at OFH2.

1.2 Further information relating to the matters raised at OFH2 can be found in the Applicant's Responses to Relevant Representations submitted at Deadline 1 [EN010133/EX1/C8.1.2].

2 Summary of the Applicant's Oral Submissions at OFH2

- 2.1.1 Mr Gareth Phillips of Pinsent Masons LLP responded to these submissions on behalf of the Applicant. He firstly thanked the participants for their submissions and their appearance at the OFH. He explained that the major policy changes relevant to the Scheme have not been the result of intense lobbying by the solar industry and cited the review of the energy-related National Policy Statements (NPS), which has been undertaken since September 2021, been subject to two rounds of public consultation, resulting in the final versions published in November 2023. Mr Phillips explained that the energy White Paper from the UK government in December 2020 made clear that both offshore wind and ground mounted solar play a key part in the future UK energy mix. All policy adopted by government since then has consistently included ground mounted solar in energy mix to achieve decarbonisation and mitigate climate change, including the British Energy Security Strategy (2022), which set an expectation of a fivefold increase in solar generated power, equating to 70 GW.
- 2.1.2 Mr Phillips commented on the revised NPSs, which make clear that time delays in offshore wind and nuclear projects mean progress towards renewable targets would be impossible without solar. He said that the NPS revisions have not been "rashly" introduced but were carefully designed policy instruments subjected to public and parliamentary scrutiny.
- 2.1.3 On the issue of food security, Mr Phillips said that the UK government (more specifically the Department for Environment, Food and Rural Affairs) has confirmed that there is no "food crisis" in the UK and that solar energy will not cause or contribute to such an outcome. He said the amount of agricultural land available in the UK is five times that of all the land required to achieve 70 GW generation by 2035 target.
- 2.1.4 Mr Phillips also commented on the ethical procurement plan and policies he had worked on alongside Solar Energy UK, which were legally binding controls to demonstrate that ethically sourced solar projects were possible. The controls in the Outline Skills, Supply Chain and Employment Plan [APP-349], would be enforceable by the LPA, and oblige whoever owns/develops the Scheme to demonstrate that forced labour has not been involved in the supply chain.
- 2.1.5 On the issue of local planning policy, Mr Phillips pointed out that local policies must accord with national policy including the National Planning Policy Framework (revised September 2023). This means that the prominence of solar energy in UK national planning guidance would also be relevant to local decision-making processes, were the Scheme not classified as an NSIP and therefore subject to decision making by the Secretary of State rather than the local planning authority. Mr Phillips commented that the wider policy context should be considered when thinking about how solar projects are deployed at the local level.

- 2.1.6 Mr Phillips also commented on the purpose of the Scheme, which is to generate around 600 MW of clean power, noting it represents a good use of the local grid connection.
- 2.1.7 Finally, on the points raised in the OFH regarding health impacts, Mr Phillips noted that they were assessed across several documents in the Environmental Statement (ES) and that Chapter 21 of that document signposts where health impacts have been assessed in different ES topic chapters.

3 The Applicant's Responses to Oral Submissions to OFH2

3.1 Sir Edward Leigh MP

Reference	Theme	Summary of issue raised	Applicant's Response
	Cumulative Development DCO process	Mr Leigh raised concerns about the size of the scheme and the cumulative level of development around Gainsborough. He stated there was a need for the Cottam Solar Project to be examined in the context of other NSIPs in the area.	The Applicant notes this response.
	General	Mr Leigh mentioned the grant of the DCO would result in farmland loss, which he said was against the presumption against solar projects using 3b farmland contained in the National Planning Policy Framework.	Agricultural land in the Sites is predominantly (95.9%) Grade 3b, as set out in Table 1 of C6.3.19.1 Agricultural Land Quality Soil Resources [APP-145]. In Agricultural Land Classification (ALC), Grade 3b is not defined as Best and Most Versatile (BMV) agricultural land. Annex 2 of the National Planning Policy Framework (NPPF) describes the Best and Most Versatile agricultural land as " <i>Land in grades 1, 2 and 3a of the Agricultural Land Classification.</i> "
K	Principle of Development	Mr Leigh said that a residential rooftop solar strategy would be more appropriate than utility-scale solar farms.	<p>The Applicant has consistently agreed that rooftop solar can make a contribution to decarbonisation but the critical point made in C7.11 Statement of Need [APP-350] (which includes reference to Government's position e.g. at Para 3.3.11 with which it agrees), is that rooftop solar alone will not deliver the amount of solar capacity needed to deliver a decarbonised electricity system by 2035. Therefore the deployment of rooftop solar is not an alternative to the Scheme and therefore does not diminish the need for the Scheme.</p> <p>The Applicant has provided further information on this point in its answer to the ExA's FWQ1.3.5, which responds to</p>

Reference	Theme	Summary of issue raised	Applicant's Response
			statements made in 7000 Acres REP-117 in C8.1.18 The Applicant's Responses to Written Representations [REP-2-050].
	General	1. Can the Project give guarantee that solar panels production does not involve slave labour?	Please refer to response 7A-51 in C8.1.2 The Applicant's Responses to Relevant Representations [REP-049].

3.2 Councillor Porteous

Reference	Theme	Summary of issue raised	Applicant's Response
	Soils and agriculture	Mr Porteous stated the proposed Scheme would involve significant land take and, combined with the other solar NSIPs in the Lincolnshire area, would have a negative effect on food production. He said he objects to any solar project on grade 1,2, or 3a land (i.e. "best and most versatile") and any major solar project on grade 3b land.	The Defra UK Food Security Report notes that the proportion of domestically produced food for the UK (for both all food and just the foods that the UK can commercially produce) has remained stable for decades. It also notes that the most serious risks to UK food security include climate change and soil degradation. Land use change and loss of land to development are not noted as significant risks to UK food security. As noted in C6.2.19 ES Chapter 19 Soils and Agriculture Revision A [REP-010] paragraph 19.5.2, there are no food security policy constraints on the use of agricultural land for solar power development, and alternative energy crops require a considerably larger land area per unit of energy, potentially displacing a greater area of food cropping.

3.3 Ms. Margaret O'Grady on behalf of Fillingham Parish Meeting

Reference	Theme	Summary of issue raised	Applicant's Response
	Soils and agriculture Principle of Development	Ms. O'Grady raised concerns about the use of land by the Scheme in Lincolnshire and stated rooftop solar was a better option.	<p>The Applicant has provided a response on rooftop solar as part of its response to ExA's FWQ 1.3.5 (C8.1.15 the Applicant's Response to the ExA's First Written Questions [REP-2-034]).</p> <p>The Applicant has consistently agreed that rooftop solar can make a contribution to decarbonisation but the critical point made in C7.11 Statement of Need [APP-350] (which includes reference to Government's position e.g. at Para 3.3.11 with which it agrees), is that rooftop solar alone will not deliver the amount of solar capacity needed to deliver a decarbonised electricity system by 2035. Therefore the deployment of rooftop solar is not an alternative to the Scheme and does not diminish the need for the Scheme.</p> <p>The British Energy Security Strategy (2022) set an ambition for 70GW of solar in the UK by 2035, an ambition which was confirmed in Powering Up Britain (Energy Security Plan) which on p35 states: "we are aiming for 70 gigawatts of ground and rooftop capacity together by 2035. This amounts to a fivefold increase on current installed capacity. We need to maximise deployment of both types of solar to achieve our overall target" the subsequent two paragraphs explain the benefits of each type of solar installation (rooftop, and ground mount) and concludes by considering that "there is a strong need for increased solar deployment"</p> <p>The party is also directed to response reference IPC-02 within C8.1.17 The Applicant's Responses to Written</p>

Reference	Theme	Summary of issue raised	Applicant's Response
			Representations and Other Submissions at Deadline 1: Part 1 [REP2-048].
	General Consultation	She stated the Applicant had lobbied government to advance their own agenda and belittled the local community on social media.	The Applicant strongly rejects any claim that they belittled the local community. Discussions between the solar industry and government ministers do take place, but this is the case for all types of renewable and non-renewable energy generation technologies.

3.4 Ms. Catherine Booth

Reference	Theme	Summary of issue raised	Applicant's Response
	Energy Need Alternatives and Design Evolution Transport	<p>Ms Booth raised the following issues surrounding the cable route relocation:</p> <ul style="list-style-type: none"> • The potential for noise and visual pollution to affect nearby properties • Road accidents on the single track route leading up to the cable route corridor, specifically collisions caused by the blind bend at area of interest 14298 and particularly if the application to move the cable corridor to the south of West Farm is approved. A construction compound would contribute to road accidents on that blind bend because of vehicles waiting. 	<p>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. All movements at the access will be managed through the C6.3.14.2_B ES Appendix 14.2 Construction Traffic Management Plan [EN010133/EX3/ C6.3.14.2_D] to ensure the safety of all road users, and vehicle will not wait on the public highway. The Plan is secured by Requirement 15 of Schedule 2 to C3.1_E draft Development Consent Order Version E [EN010133/EX3/C3.1_E] (version submitted at Deadline 3).</p>

3.5 Mr. Simon Skelton

Reference	Theme	Summary of issue raised	Applicant's Response
	Alternatives and Design Evolution	Mr Skelton queried the use of the grid connection at Cottam Substation in the context of the need to decarbonise. He stated the BESS should be stored at a brownfield site or on land adjacent to the grid connection.	<p>Section 7.5 of C7.11 Statement of Need [APP-350] describes that available land, proximity to an available and suitable grid connection and solar irradiation factors are important in the selection of a location for large-scale solar schemes.</p> <p>The Revised NPS EN-1 (November 2023) sets out the emerging policy position in favour of electricity storage: <i>"Storage has a key role to play in achieving net zero and providing flexibility to the energy system, so that high volumes of low carbon power, heat and transport can be integrated."</i> (Para 3.3.25).</p> <p>All available UK grid connections must be considered (and many must be used) to bring forwards a sufficient capacity of low-carbon generation of a mix of technologies to deliver the UK's legal decarbonisation targets. The existence of an available grid connection point at Cottam is a material consideration for the location of the Scheme, not in the least because not making use of that available connection would be wasteful of valuable public resource and armoury in the fight against climate change. The Applicant has secured a connection for import and export capacity at National Grid's Cottam substation.</p> <p>Paragraph 2.10.10 of dNPS EN-3, published November 2023, states that <i>"Government is supportive of solar that is "co-located with other functions (for example, agriculture, onshore</i></p>

Reference	Theme	Summary of issue raised	Applicant's Response
			<i>wind generation, or storage) to maximise the efficiency of land use".</i>
	Soils and agriculture	Mr Skelton raised a concern about the use of land that could be used for purposes other than the proposed Scheme.	The Defra UK Food Security Report notes that the proportion of domestically produced food for the UK (for both all food and just the foods that we can commercially produce) has remained stable for decades. It also notes that the most serious risks to UK food security include climate change and soil degradation. Land use change and loss of land to development are not noted as significant risks to UK food security. As noted in C6.2.19 ES Chapter 19 Soils and Agriculture Revision A [REP-010] paragraph 19.5.2, there are no food security policy constraints on the use of agricultural land for solar power development, and alternative energy crops require a considerably larger land area per unit of energy, potentially displacing a greater area of food cropping.
	Socio-Economics, Tourism and Recreation	Mr Skelton stated he did not believe the proposed Scheme would bring socio-economic benefits to the area and that the employment opportunities created would be limited.	The Applicant refers to comments made previously regarding socio-economic benefits and employment opportunities arising from the Scheme. These comments have been addressed at JSu-01 (pg.60) of C8.1.4 Written Summary of the Applicant's Oral Submissions & Responses at Open Floor Hearing 1 [REP-050] and at Section 3.17 of C8.1.19 The Applicant's Responses to Written Representations: Part 3 [REP2-051].
	Landscape and Visual Impact	Mr Skelton raised concerns that the proposed Scheme would impact the visual amenity of the local area.	C6.2.8 ES Chapter 8_Landscape and Visual Impact Assessment Revision A [REP2-008] (the 'LVIA') includes a full and detailed assessment that deals with both effects on

Reference	Theme	Summary of issue raised	Applicant's Response
			<p>the landscape itself and effects on the visual amenity of people, as well as interrelationships of these with other related topics in the ES. The LVIA process is iterative and as a result, the design of the Scheme changed to respond to the findings of the assessment to ensure that landscape mitigation is fully considered as part of the process. This assessment is undertaken in accordance with C6.3.8.1 ES Appendix 8.1 LVIA Methodology [APP-068].</p> <p>C6.2.8 ES Chapter 8 Landscape and Visual Impact Assessment Revision A [REP2-008] (the 'LVIA') looks to provide landscape mitigation that seeks to enhance the landscape character of the Study Area and to reduce the visibility of the Scheme from residential properties and other public vantage points including transport routes, public footpaths, permissive footpaths and green lane network. This mitigation is aimed to benefit the community as a whole to enhance their way of life as well as green infrastructure (see paras. 8.1.1 and 8.8.3). Public consultation has also taken account of landscape and visual matters (see paras. 8.2.8 and 8.4.20). The landscape mitigation measures seek to provide new planting to mitigate the potential impacts and effects of glint and glare (see paras. 8.2.10, 8.4.44, 8.8.8, 8.9.19 and 8.9.20).</p>

3.6 Ms. Elizabeth Garbutt on behalf of 7000 Acres

Reference	Theme	Summary of issue raised	Applicant's Response
	General	Ms Garbutt stated the Applicant had prioritised commercial needs above local needs. She stated that the decarbonisation strategy of the solar NSIPs across Lincolnshire was chaotic and there is too much capacity in the pipeline above the UK government identified need.	The Applicant has responded to these points in its response to 7,000 Acres' response to the ExA's First Written Question 1.3.1. Please see the Applicant's Responses to Deadline 2 Submissions [EX3/C8.1.27]. The key point is that the pipeline of solar developments in the UK is not sufficiently secure. The Applicant considers that the proposed location is a high priority location because of the beneficial characteristics of the location (irradiation, availability of land and availability of grid connection).
	General Energy Need	Ms. Garbutt said offshore wind grid connections were more important than solar. She also raised the following issues: <ul style="list-style-type: none"> • Failure of scheme to deliver meaningful contribution to decarbonisation; • The Applicant could not be trusted to present accurate environmental evidence; • There is no local clamour for large scale solar farms; and • Renewable energy should protect the environment, not destroy it. 	Paragraph 5.5.8 of C7.11 Statement of Need [APP-350] states the contribution of existing solar capacity to low-carbon UK generation (c. 4% of total UK supply). Section 3.3 of document C7.11 Statement of Need [APP-350] describes the Government's view that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar". This support for large scale solar as part of the 'answer' to net zero and energy security has been repeated in its recent policy documents published in March 2023. The Applicant has responded in relation to the contribution of solar to security of energy supply, and its role alongside other sources, in its response to Dorne Johnson's response to the ExA's First Written Question 1.3.1. Please see the Applicant's Responses to Deadline 2 Submissions [EX3/C8.1.27].

Reference	Theme	Summary of issue raised	Applicant's Response
			<p>The environmental assessments submitted by Applicant in support of the Application is subject to robust scrutiny by a range of stakeholders through the statutory examination process.</p> <p>The Application is supported by national energy environmental strategies adopted by the UK government.</p> <p>While some significant adverse environmental impacts have been identified within the Environmental Statement, these can be balanced against significant benefits ES Chapter 23 Summary of Significant Effects Revision A [REP2-010], notably in relation to climate change ES Chapter 7 Climate Change Revision A [REP-014].</p>

3.7 Ms. Elizabeth Garbutt on behalf of Mr. John Park

Reference	Theme	Summary of issue raised	Applicant's Response
	Human health	<p>The submission raised the following issues:</p> <ul style="list-style-type: none"> • Mental health and wellbeing of local residents would be affected by the Project. There has been little discussion in the application process of these issues; • Wider determinants of health need to be looked at during the Examination process – particularly the socio-economic and environmental aspects of health and wellbeing; • There would be cumulative impacts on health and inequality in towns such as Gainsborough. Concern was raised that the Applicant has not looked at this issue and the NHS “Core20PLUS5” strategy should be looked at; • The alteration of the local environment will drive younger people out of Gainsborough, leaving the older and vulnerable population. 	<p>The Applicant refers to comments made previously on matters regarding health and wellbeing by Ms. Garbutt on behalf of 7000 Acres. These comments have been addressed at Section 2.5 of C8.1.18 The Applicant's Responses to Written Representations: Part 2 [REP2-050].</p>
	Human health	<p>1. Has there been a cumulative impact assessment undertaken on local health and wellbeing?</p>	<p>The Applicant confirms that a cumulative effects assessment has been prepared for the Application within the Environmental Statement [APP-036 to APP-058]. Significant human health and wellbeing effects are summarised in Section 21.5 of C6.2.21 ES Chapter 21: Other Environmental Matters [APP-056]. Significant</p>

Reference	Theme	Summary of issue raised	Applicant's Response
			cumulative effects on health and well-being are summarised at paragraphs 21.5.37-43 [APP-056].

3.8 Mr. Simon Stiles

Reference	Theme	Summary of issue raised	Applicant's Response
	Cumulative Development	Mr. Stiles said that residents feared the Scheme and the three other NSIP applications in the area should be one application and considered together by PINS.	The Applicant respectfully disagrees. There are four separate projects that are the subject of separate DCO applications. Cumulative effects assessments have been prepared for the Application within the Environmental Statement [APP036 to APP-058]. Cumulative effects assessments for each topic are set out in each of the ES Chapters and include the assessment of the impacts of the Scheme cumulatively with the NSIPs identified in paragraph 2.5.9 of C6.2.2 ES Chapter 2 EIA Process and Methodology [APP-037]. This assessment is in accordance with Schedule 4 of the 2017 EIA Regulations and PINS Advice Note 17. The mitigation measures set out across the ES therefore account for anticipated cumulative effects.
	General	Mr. Stiles commented that solar was not an efficient method of electricity generation.	Solar panels and associated electrical infrastructure have become more efficient as the technology has improved. Figure 10.2 of C7.11 Statement of Need [APP-350] shows that many solar cell cells are over 20% efficient and some are within reach of 30% efficiency, meaning that more low-carbon electricity can be generated from the same area of land as was previously possible. Table 7.1 of C7.11 Statement of Need [APP-350] shows the electricity generated per Ha by different low-carbon technologies. At the UK's average solar load factor (11%), solar generation produces much more energy per Ha than biogas, and generates a similar amount of energy as onshore wind.

Reference	Theme	Summary of issue raised	Applicant's Response
			<p>Solar is now a leading low-cost generation technology and Figure 10.4 of C7.11 Statement of Need [APP-350] shows that on a levelized cost of energy basis, large scale solar is already cheaper than offshore wind, and the Government's projections are that it will remain cheaper in the future.</p>

3.9 Mr. Alasdair Broadbent

Reference	Theme	Summary of issue raised	Applicant's Response
	General	Mr. Broadbent said that the load factor from solar energy is 10.2% and therefore the stated capacity of the Scheme is not a guaranteed value. He said the stated load factor was weighted to the summer months. Mr Broadbent commented the Applicant should guarantee a minimum level of generation for [PINS] to make a decision on the application.	Mr Broadbent is directed to the Applicant's response to Dorne Johnson's response to the ExA's First Written Question 1.3.1. Please see the Applicant's Responses to Deadline 2 Submissions [EX3/C8.1.27]. The Applicant is not able to guarantee a minimum level of generation. Government's Digest on UK Energy Statistics (Table 6.2, June 2023) tells us that on average in the UK since 2016, solar has achieved a load factor of 10.3%, but has varied from 9.9% to 11.1% over those seven years. The Applicant therefore remains confident on the projections of energy generation from the Scheme that it has previously made in its submissions.
	Alternatives and Design Evolution	Mr. Broadbent said the Applicant has not specified the technology to be used in the Scheme nor the panel type.	As described in Chapter 2 of the Environmental Statement C6.2.2 EIA Process and Methodology [APP-037], the Applicant has adopted the 'Rochdale Envelope' approach for this Application. This approach provide flexibility in the DCO Application, which allows for an iterative process in the Scheme design to use the most up to date technology possible at the time of construction, while also ensuring that environmental impacts are adequately assessed. The parameters of the Scheme are set out in C7.15_B Concept Design Parameters and Principles Revision B [EN010133/EX3/C7.15_B].
	General	Mr. Broadbent said there were issues around the volume and level of conflicting information provided to the public	Paragraph 2.1.10 of C6.3.5.1 ES Appendix 5.1 Site Selection Assessment [APP-067] explains the reasons why

Reference	Theme	Summary of issue raised	Applicant's Response
		regarding the Scheme – for example the difference in generation figures from Tillbridge and Cottam.	the Cottam site is of the size proposed which is necessary to meet the 600MW grid connection offer for this particular site. Tillbridge Solar has an offer from National Grid to access up to 500MW of grid connection capacity.
	Soils and agriculture	Mr. Broadbent raised concerns about food security and the removal of farmland.	<p>The Defra UK Food Security Report notes that the proportion of domestically produced food for the UK (for both all food and just the foods that we can commercially produce) has remained stable for decades. It also notes that the most serious risks to UK food security include climate change and soil degradation. Land use change and loss of land to development are not noted as significant risks to UK food security. As noted in C6.2.19 ES Chapter 19 Soils and Agriculture Revision A [REP-010] paragraph 19.5.2, there are no food security policy constraints on the use of agricultural land for solar power development, and alternative energy crops require a considerably larger land area per unit of energy, potentially displacing a greater area of food cropping.</p> <p>Following decommissioning, all the land will be able to resume agricultural activities. During decommissioning, all agricultural land can be restored without loss of extent or ALC grade - it is not anticipated that the Scheme will cause any sterilisation of agricultural land. Decommissioning is secured via requirement 21 in Schedule 2 to the draft DCO [EX3/C3.1_E].</p> <p>Furthermore, the Sites will remain as agricultural land for the duration of the development and, during the</p>

Reference	Theme	Summary of issue raised	Applicant's Response
			operational period for the Scheme, are able to continue to support agricultural practices, such as grazing sheep.

3.10 Mr. Michael Dover

Reference	Theme	Summary of issue raised	Applicant's Response
	Cumulative Development	Mr. Dover stated his objection to the proposed Scheme and stated the Lincolnshire NSIPs should be considered as one project.	The Applicant respectfully disagrees. There are four separate projects that are the subject of separate DCO applications. Cumulative effects assessments have been prepared for the Application within the Environmental Statement [APP036 to APP-058]. Cumulative effects assessments for each topic are set out in each of the ES Chapters and include the assessment of the impacts of the Scheme cumulatively with the NSIPs identified in paragraph 2.5.9 of C6.2.2 ES Chapter 2 EIA Process and Methodology [APP-037]. This assessment is in accordance with Schedule 4 of the 2017 EIA Regulations and PINS Advice Note 17. The mitigation measures set out across the ES therefore account for anticipated cumulative effects.
	Human Health	Mr. Dover stated the proposed Scheme has no welfare for the community in its plan and it is about profits.	<p>The Applicant refers to comments made previously on matters regarding community benefits and the benefits of the Scheme overall. These comments have been addressed at EGa-06 (pg.25) of C8.1.4 Written Summary of the Applicant's Oral Submissions & Responses at Open Floor Hearing 1 [REP-050], and at PLA-06 (pg.129-133) and PD-04 (pg.146) of C8.1.19 The Applicant's Responses to Written Representations: Part 3 [REP2-051].</p> <p>A specific response regarding the proposed Community Benefit Fund is provided at PD-02 (Pg. 136) [REP2-051].</p>

Reference	Theme	Summary of issue raised	Applicant's Response
	General	Mr. Dover said he believed that solar and wind energy resulted in higher consumer energy prices.	<p>Section 10.2 of C7.11 Statement of Need [APP-350] provides evidence to the contrary: solar and wind energy reduce the cost of energy for consumers.</p> <p>Following significant cost increases in electricity during 2022 due to geopolitical issues increasing gas prices, the Committee on Climate Change provided further guidance on the role of solar and wind in energy generation.</p> <p>Page 22 of the Climate Change Committee's June 2023 Progress Report to Parliament states that: "Given short lead-times, rapid deployment of onshore wind and solar could have helped to mitigate dependence on imported gas during the fossil fuel crisis." implying that increased renewable generation could have provided a shield for consumers to volatile international prices – a theme also central to the British Energy Security Strategy (2022).</p>
	Soils and agriculture	Mr. Dover raised a concern about the strain on global food production and the effect of the proposed Scheme on farmland.	<p>The Defra UK Food Security Report notes that the proportion of domestically produced food for the UK (for both all food and just the foods that we can commercially produce) has remained stable for decades. It also notes that the most serious risks to UK food security include climate change and soil degradation. Land use change and loss of land to development are not noted as significant risks to UK food security. As noted in C6.2.19 ES Chapter 19 Soils and Agriculture Revision A [REP-010] paragraph 19.5.2, there are no food security policy constraints on the use of agricultural land for solar power development, and alternative energy crops require a considerably larger land</p>

Reference	Theme	Summary of issue raised	Applicant's Response
			<p>area per unit of energy, potentially displacing a greater area of food cropping.</p> <p>Following decommissioning, all the land will be able to resume agricultural activities. During decommissioning, all agricultural land can be restored without loss of extent or ALC grade - it is not anticipated that the Scheme will cause any sterilisation of agricultural land. Decommissioning is secured via requirement 21 in Schedule 2 to the draft DCO [EX3/C3.1_E].</p> <p>Furthermore, the Sites will remain as agricultural land for the duration of the development and, during the operational period for the Scheme, are able to continue to support agricultural practices, such as grazing sheep.</p>

3.11 Mr. Andy Johnson

Reference	Theme	Summary of issue raised	Applicant's Response
	DCO process General	Mr. Johnson said the impact statements produced by the Applicant for the DCO application were not of high quality nor well researched.	The Applicant is confident that the level of information presented in the application is in accordance with the Planning Act 2008 and associated guidance and with the Town and Country Planning (EIA) Regulations 2017. This is evidenced by the fact that the Planning Inspectorate has accepted it for examination.
	Human health	Mr. Johnson raised concern about the health and wellbeing impact of the proposed Scheme. He requested a full health impact assessment by the NHS or equivalent body.	The Applicant notes this comment.
	General	1. Will there be a reduction of population over time in the local area due to the proposed Scheme?	The Applicant has not anticipated there to be any reduction to local population or significant adverse changes to the demographic profile of the Local Impact Area as a result of the Scheme. In the assessment in Section 18.7 of C6.2.18 ES Chapter 18_Socio Economics Tourism and Recreation [APP-053] a negligible increase in population has been assessed in relation to the potential for inbound workers to move to the area during construction (para. 18.7.28), operation (18.7.82), and during decommissioning (para. 18.7.127).

3.12 Mr. Jeffrey Summers

Reference	Theme	Summary of issue raised	Applicant's Response
	DCO process General	Mr. Summers said there were concerns about the economic viability of the Scheme and the level of wisdom in making the NSIP application.	Details regarding the funding of the Scheme can be found in C4.2 Cottam Funding Statement [APP-019]. The economic viability of the Scheme is a matter for the Applicant and not a planning concern.
	Soils and agriculture	Mr. Summers raised concerns about the effect of the proposed Scheme on UK food production and water supply to crops during dry periods.	The Defra UK Food Security Report notes that the proportion of domestically produced food for the UK (for both all food and just the foods that we can commercially produce) has remained stable for decades. It also notes that the most serious risks to UK food security include climate change and soil degradation. Land use change and loss of land to development are not noted as significant risks to UK food security. As noted in C6.2.19 ES Chapter 19 Soils and Agriculture Revision A [REP-010] paragraph 19.5.2, there are no food security policy constraints on the use of agricultural land for solar power development, and

Reference	Theme	Summary of issue raised	Applicant's Response
			<p>alternative energy crops require a considerably larger land area per unit of energy, potentially displacing a greater area of food cropping.</p> <p>The Grade 3b land at the Sites is limited in the range of crops that can be economically produced. Such land is common in England</p>
	Landscape and visual impact	Mr. Summers raised concerns about glint and glare coming from solar farm panels.	The impacts of glint and glare upon key receptors have been considered and assessed within C6.3.16.1 ES Appendix 16.1 Solar Photovoltaic Glint and Glare Study [APP-140]. Where impacts are predicted to be significant mitigation will be implemented. The landscape mitigation measures are set out within C6.2.8_A ES Chapter 8 Landscape and Visual Impact Assessment Revision A [REP2-008]
	General	1. Can documents be made available with information about how much CO2 will be created by the manufacture of solar panels for the proposed Scheme, transportation to the UK, delivery to Lincolnshire, construction and decommissioning?	This information is included within the Climate Change ES Chapter 7 Revision A [REP-014]. In particular, please see Table 7.11 and section 7.8 of Chapter 7.

3.13 Mr. Christopher Reeve

Reference	Theme	Summary of issue raised	Applicant's Response
	General Human health	Mr. Reeve raised concerns about increasing costs in the countryside and the difficulty of retaining the way of life. He said the Scheme would blight the landscape in Lincolnshire.	<p>C6.2.8 ES Chapter 8_Landscape and Visual Impact Assessment Revision A [REP2-008] (the 'LVIA') includes a full and detailed assessment that deals with both effects on the landscape itself and effects on the visual amenity of people, as well as interrelationships of these with other related topics in the ES. The LVIA process is iterative and as a result, the design of the Scheme changed to respond to the findings of the assessment to ensure that landscape mitigation is fully considered as part of the process. This assessment is undertaken in accordance with C6.3.8.1 ES Appendix 8.1 LVIA Methodology [APP-068].</p> <p>C6.2.8 ES Chapter 8 Landscape and Visual Impact Assessment Revision A [REP2-008] (the 'LVIA') looks to provide landscape mitigation that seeks to enhance the landscape character of the Study Area and to reduce the visibility of the Scheme from residential properties and other public vantage points including transport routes, public footpaths, permissive footpaths and green lane network. This mitigation is aimed to benefit the community as a whole to enhance their way of life as well as green infrastructure (see paras. 8.1.1 and 8.8.3). Public consultation has also taken account of landscape and visual matters (see paras. 8.2.8 and 8.4.20). The landscape mitigation measures seek to provide new planting to</p>

Reference	Theme	Summary of issue raised	Applicant's Response
			mitigation the potential impacts and effects of glint and glare (see paras. 8.2.10, 8.4.44, 8.8.8, 8.9.19 and 8.9.20).
	Soils and agriculture	Mr. Reeve raised concerns the proposed Scheme would impact good farmland.	<p>Agricultural land in the Sites is predominantly ALC Grade 3b, see Table 1 of C6.3.19.1 Agricultural Land Quality Soil Resources [APP-145]. In Agricultural Land Classification (ALC), Grade 3b is not defined as Best and Most Versatile (BMV) agricultural land, the definition of which is given in Annex 2 of the NPPF.</p> <p>There is a commitment to decommission the Scheme at the end of its operational life. During decommissioning, all agricultural land can be restored without loss of extent or ALC grade - it is not anticipated that the Scheme will cause any sterilisation of agricultural land. Decommissioning is secured via requirement 21 in Schedule 2 to the draft DCO [EX3/C3.1_E].</p>

3.14 Mr. William Rose

Reference	Theme	Summary of issue raised	Applicant's Response
	General	Mr Rose objected to the project in general terms, noting concerns about the legacy of leaving 10,000 acres of solar panels in the local area.	In response to concerns raised by the Examining Authority and interested parties regarding the Scheme being in place in perpetuity, the Applicant 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 The current version of the DCO is C3.1_E draft Development Consent Order Version E [EN010133/EX3/C3.1_E] (version provided at Deadline 3).

3.15 Ms. Cheryl Felix

Reference	Theme	Summary of issue raised	Applicant's Response
	Soils and agriculture	Ms. Felix commented on the need for additional food production in the UK due to increasing population.	The Defra UK Food Security Report notes that the proportion of domestically produced food for the UK (for both all food and just the foods that we can commercially produce) has remained stable for decades. It also notes that the most serious risks to UK food security include climate change and soil degradation. Land use change and loss of land to development are not noted as significant risks to UK food security. As noted in C6.2.19 ES Chapter 19 Soils and Agriculture Revision A [REP-010] paragraph 19.5.2, there are no food security policy constraints on the use of agricultural land for solar power development, and alternative energy crops require a considerably larger land area per unit of energy, potentially displacing a greater area of food cropping.
	Consultation	1. Could the Scheme assure local residents they are being listened to during the application process?	The Applicant acknowledges this comment and is confident that the level of consultation undertaken and information presented throughout the pre-application stage is in accordance with the Planning Act 2008 and associated guidance. This has been evidenced in C5.1 Consultation Report [APP-021], which was submitted to the Planning Inspectorate and accepted for examination. Chapter 2 of C5.1 Consultation Report [APP-021], details how two phases of community consultation were undertaken to share information and invite feedback at different stages of Scheme development.

Reference	Theme	Summary of issue raised	Applicant's Response
			<p>Chapter 7 of C5.1 Consultation Report [APP-021] describes the Applicant's approach to statutory consultation, including consulting with relevant authorities on a draft Statement of Community Consultation. Table 7.1 sets out the comments received from authorities on the Applicant's approach to consultation and how these were considered by the Applicant. Table 7.3 in Chapter 7 describes how the Applicant complied with commitments made in the Statement of Community Consultation when undertaking statutory consultation.</p> <p>Chapter 8 of C5.1 Consultation Report [APP-021] describes how the Applicant undertook a six-week statutory phase two consultation on the Scheme, during which the Applicant presented consultees with environmental information sufficient for consultees to understand the potential likely significant effects of the Scheme in a Preliminary Environmental Impact Report (PEIR). A non-technical summary was published to accompany the PEIR, with public information events and free-to-use communications channels open to help aid accessibility and understanding of the Scheme, including the accessibility of drawings and illustrations of the Scheme.</p> <p>The Applicant notes that a Phase Two Community Consultation Leaflet was issued to over 9000 properties within the vicinity of the Scheme, which the respondent's address lies within. A Consultation Summary Report for this phase of statutory consultation was published on the dedicated Scheme website, shared with elected</p>

Reference	Theme	Summary of issue raised	Applicant's Response
			<p>representatives and stakeholders and issued to over 9,000 properties within the vicinity of the Scheme, to help consultees understand how their feedback was being considered. A copy of the Phase Two Consultation Summary Report is provided as C5.7 Appendix 5.7: Phase Two Community Consultation Materials [APP-028].</p> <p>Chapter 11 of C5.1 Consultation Report [APP-021] describes the significant volume of responses received to Section 47 consultation (local community) , including the issues raised and how these were considered by the Applicant. This chapter also details that the Applicant received 694 pieces of feedback. This included 195 hard copy feedback forms, 320 responses to the digital engagement platform, and 179 written responses received by email or Freepost This is further evidenced by C5.10 Appendix 5.10: Consultation Report Appendix – Section 47 Applicant Response [APP-033].</p>

3.16 Ms. Sue Bingham

Reference	Theme	Summary of issue raised	Applicant's Response
	Soils and agriculture	Ms. Bingham said her family farm had ALC grade 3 land in Willingham by Stowe. She said that food production should not be disregarded by solar schemes. High quality land was not suitable for solar panels.	Agricultural land in the Sites is predominantly (95.9%) Grade 3b, as set out in Table 1 of C6.3.19.1 Agricultural Land Quality Soil Resources [APP-145]. In Agricultural Land Classification (ALC), Grade 3b is not defined as Best and Most Versatile (BMV) agricultural land, the definition of which is given in Annex 2 of the NPPF.
	Human health	Ms Bingham criticised the profit making nature of the Applicant company. She said there was a mental health crisis and asked for a report to be prepared on the issue specifically.	The Applicant refers to comments made previously on matters regarding health and wellbeing, and the need for a specific health impact assessment. These comments have been addressed at Section 2.5 of C8.1.18 The Applicant's Responses to Written Representations: Part 2 [REP2-050].

3.17 Mr. Peter O'Grady

Reference	Theme	Summary of issue raised	Applicant's Response
	Human health	Mr O'Grady said that independent experts were needed on discrete issues such as health.	<p>Please refer to Section 2.5 of document C8.1.18 The Applicant's Responses to Written Representations: Part 2 [REP2-050] where the Applicant has addressed comments on these matters.</p> <p>The Applicant also refers Mr O'Grady to section 3.20, and the relevant appendices, in C6.3.2.2 ES Appendix 2.2 EIA Scoping Opinion [APP-064], wherein the scope of assessment was agreed by PINS, the host local authorities, and the relevant health authorities and statutory bodies. These consultees had additional opportunity to comment on the scope of assessment through the Section 42 Statutory Consultation – refer to C5.11 Consultation Report Appendix - Section 42 Applicant Response [APP-034] –which demonstrates how comments made on the methodology for the assessment of human health and wellbeing impacts were taken account of in the preparation of the application for the Scheme. The Applicant is therefore confident that the scope, methodology, data sources used, and outcomes of the assessments on human health and wellbeing are sufficient for the Scheme to be suitably determined against.</p>
	General	Mr O'Grady said that renewable energy priorities were flawed and criticised the new NPS EN-1 of November 2023.	Government has a legal commitment to achieve net zero carbon emissions by 2050. Chapter 4 of C7.11 Statement of Need describes this commitment and steps Government is taking to deliver that commitment.

Reference	Theme	Summary of issue raised	Applicant's Response
			<p>Section 3.3 of document C7.11 Statement of Need [APP-350] describes the Government's view that "a secure, reliable, affordable, Net Zero consistent system in 2050 is likely to be composed predominantly of wind and solar". This support for large scale solar as part of the 'answer' to net zero and energy security has been repeated in its recent policy documents published in March 2023.</p>

3.18 Mr. Callum O'Grady

Reference	Theme	Summary of issue raised	Applicant's Response
	General	Mr. O'Grady criticised the renewables mix in the UK and the low contribution of solar to this. He said that solar generation is inefficient.	The Applicant directs Mr O'Grady to C8.1.27 Applicants Responses to Deadline 2 Submissions [EN010133/EX3/C8.1.27] which provides evidence that solar is efficient in the UK. Please see the Applicant's response to Dorne Johnson's response to the ExA's First Written Question 1.3.1.
	General	Mr O'Grady said the Scheme would negatively affect the desirability of living in the local area.	The Applicant refers to comments made previously regarding the desirability of the area to live as a result of the Scheme. These comments have been addressed at STR-07 (pg.174-175) of C8.1.19 The Applicant's Responses to Written Representations: Part 3 [REP2-051].

3.19 Mr. Joseph Cresswell

Reference	Theme	Summary of issue raised	Applicant's Response
	Human health DCO process	Mr. Cresswell said he objected to the proposed Scheme. He said the Scheme would negatively affect local residents and that local businesses and residents were unable to oppose the Application meaningfully.	<p>The Applicant refers to comments made previously on matters regarding health and wellbeing, and the need for a specific health impact assessment. These comments have been addressed at Section 2.5 of C8.1.18 The Applicant's Responses to Written Representations: Part 2 [REP2-050].</p> <p>The Applicant is confident that the level of consultation undertaken and information presented throughout the pre-application stage is in accordance with the Planning Act 2008 and associated guidance. This has been evidenced in C5.1 Consultation Report [APP-021], which was submitted to the Planning Inspectorate and accepted for examination.</p> <p>Chapter 2 of C5.1 Consultation Report [APP-021] details how two phases of community consultation were undertaken to share information and invite feedback at different stages of Scheme development.</p> <p>Chapter 7 of C5.1 Consultation Report [APP-021] describes the Applicant's approach to statutory consultation, including consulting with relevant authorities on a draft Statement of Community Consultation. Table 7.1 sets out the comments received from authorities on the Applicant's approach to consultation and how these were considered by the Applicant. Table 7.3 in Chapter 7 describes how the Applicant complied with commitments made in the</p>

Reference	Theme	Summary of issue raised	Applicant's Response
			<p>Statement of Community Consultation when undertaking statutory consultation.</p> <p>Chapter 8 of C5.1 Consultation Report [APP-021] describes how the Applicant undertook a six-week statutory phase two consultation on the Scheme, during which the Applicant presented consultees with environmental information sufficient for consultees to understand the potential likely significant effects of the Scheme in a Preliminary Environmental Impact Report (PEIR). A non-technical summary was published to accompany the PEIR, with public information events and free-to-use communications channels open to help aid accessibility and understanding of the Scheme, including the accessibility of drawings and illustrations of the Scheme.</p> <p>The Applicant notes that a Phase Two Community Consultation Leaflet was issued to over 9000 properties within the vicinity of the Scheme, which the respondent's address lies within. A Consultation Summary Report for this phase of statutory consultation was published on the dedicated Scheme website, shared with elected representatives and stakeholders and issued to over 9,000 properties within the vicinity of the Scheme, to help consultees understand how their feedback was being considered. A copy of the Phase Two Consultation Summary Report is provided as C5.7 Appendix 5.7: Phase Two Community Consultation Materials [APP-028].</p>

Reference	Theme	Summary of issue raised	Applicant's Response
			<p>Chapter 11 of C5.1 Consultation Report [APP-021] describes the significant volume of responses received to Section 47 consultation (local community) , including the issues raised and how these were considered by the Applicant. This chapter also details that the Applicant received 694 pieces of feedback. This included 195 hard copy feedback forms, 320 responses to the digital engagement platform, and 179 written responses received by email or Freepost This is further evidenced by C5.10 Appendix 5.10: Consultation Report Appendix – Section 47 Applicant Response [APP-033].</p> <p>The Applicant also notes that the local community has had the opportunity to submit relevant representations and written representations into the Examination for the Scheme, which the Applicant has provided responses to at each of the Examination deadlines that have passed so far.</p>
	Soils and agriculture	Mr. Cresswell commented on the loss of greenfield land to the proposed Scheme.	<p>Agricultural land in the Sites is predominantly (95.9%) Grade 3b, as set out in Table 1 of C6.3.19.1 Agricultural Land Quality Soil Resources [APP-145]. In Agricultural Land Classification (ALC), Grade 3b is not defined as Best and Most Versatile (BMV) agricultural land, the definition of which is given in Annex 2 of the NPPF.</p> <p>Following decommissioning, all the land will be able to resume agricultural activities. During decommissioning, all agricultural land can be restored without loss of extent or ALC grade - it is not anticipated that the Scheme will cause any sterilisation of agricultural land. Decommissioning is</p>

Reference	Theme	Summary of issue raised	Applicant's Response
			<p>secured via requirement 21 in Schedule 2 to the draft DCO [EX3/C3.1_E].</p> <p>Furthermore, the Sites will remain as agricultural land for the duration of the development and, during the operational period for the Scheme, are able to continue to support agricultural practices, such as grazing sheep.</p>

3.20 Mr. Martin Casswell

Reference	Theme	Summary of issue raised	Applicant's Response
	Soils and agriculture	Mr. Casswell said there has not been a detailed soil classification analysis undertaken by the Applicant. He said there should not be solar panels on land of ALC grade 1,2 or 3. He said there needs to be an up to date soil classification made.	The Environmental Statement provides a detailed Agricultural Land Classification (ALC) assessment of land within the Sites, C6.3.19.1 Agricultural Land Quality Soil Resources [APP-145]. As shown on Table 1 of this document, approximately 95.5% of the Sites are ALC Grade 3b. As set out in Annex 2 of the NPPF, ALC Grade 3b is not defined as Best and Most Versatile (BMV) agricultural land.
	Transport	Mr. Casswell raised concerns about construction traffic on narrow country lanes.	An Outline Construction Traffic Management Plan (CTMP) has been prepared to support the application within C6.3.14.2 ES Appendix 14.2 Construction Traffic Management Plan [EN010133/EX3/ C6.3.14.2_D]. This will be secured through Requirement 15 in Schedule 2 to C3.1_E Draft Development Consent Order Version E [EN010133/EX3/C3.1_E] (version provided at Deadline 3). . The outline CTMP provides a framework for the management of construction vehicle movements to and from the Scheme, to ensure that the effects of the temporary construction phase on the local highway network are minimised.
	Soils and agriculture	Mr. Casswell raised concerns about the effect of the proposed Scheme on food production in the Lincolnshire area.	The Defra UK Food Security Report notes that the proportion of domestically produced food for the UK (for both all food and just the foods that we can commercially produce) has remained stable for several decades. It also notes that the most serious risks to UK food security include climate change and soil degradation. Land use change and

Reference	Theme	Summary of issue raised	Applicant's Response
			<p>loss of land to development are not noted as significant risks to UK food security. As noted in C6.2.19 ES Chapter 19 Soils and Agriculture Revision A [REP-010] paragraph 19.5.2, there are no food security policy constraints on the use of agricultural land for solar power development, and alternative energy crops require a considerably larger land area per unit of energy, potentially displacing a greater area of food cropping.</p>

3.21 Ms. Victoria White

Reference	Theme	Summary of issue raised	Applicant's Response
	General	Ms. White said that solar panels lacked efficiency. Ms. White also said there was an impact on local residents.	The Applicant directs Ms White to C8.1.27 Applicants Responses to Deadline 2 Submissions [EN010133/EX3/C8.1.27] which provides evidence that solar is efficient in the UK. Please see the Applicant's response to Dorne Johnson's response to the ExA's First Written Question 1.3.1.
	General	Ms. White requested a report on all benefits and detrimental impacts on the local community.	<p>The public benefits of the Scheme are set out at Section 4 of the C7.5_B Planning Statement [REP-047]. The impacts of the scheme upon the local community are set out in ES Chapter 18_Socio Economics Tourism and Recreation [APP-053] and the human health impacts of the scheme are assessed in C6.2.21 ES Chapter 21: Other Environmental Matters [APP-056] drawing conclusions from across other relevant chapters within the ES. The Applicant will provide a stand alone document at Deadline 4 which sets out the human health effects of the Scheme.</p> <p>As described in Section 6 of the Planning Statement [REP-047], whilst it has not been possible to avoid all environmental impacts these have been minimised where possible, through careful and sensitive design and detailed mitigation strategies. When considered against the relevant NPSs and the NPPF, the Scheme accords with relevant policies, and with regard to specific policy tests, the national and local benefits of the Scheme are considered on balance to outweigh its adverse impacts. Paragraph 3.2.3 of NPS EN-1 (2011 version) notes that it will not be possible to</p>

Reference	Theme	Summary of issue raised	Applicant's Response
			<p>develop the necessary amounts of such infrastructure without some significant residual adverse impacts. This wording is also repeated in paragraph 3.1.2 of the latest version of the NPS EN-1, published November 2023.</p> <p>The Applicant is committed to providing a Community Benefit Fund – see paragraph 4.8.1 of C7.5_B Planning Statement Revision B [EN010133/EX2/C7.5_B] [REP2-028]. This fund will be available for community-based benefits throughout the lifetime of the Scheme. The provision of the Community Benefit Fund itself does not form a part of the DCO Application, and therefore will be agreed separately between the Applicant and the fund's beneficiaries.</p>